CTCAC Committee Meeting
Wednesday, December 11, 2024
9:30 A.M. or Upon Adjournment
of the CDLAC Meeting

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE

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Sacramento, CA 95814
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BOARD MEMBERS (VOTING)

FIONA MA, CA, CHAIR
State Treasurer

MALIA M. COHEN
State Controller

JOE STEPHENSHAW
Director of Finance

GUSTAVO VELASQUEZ
Director of HCD

TIENA JOHNSON HALL
Executive Director of CalHFA

DIRECTOR

MARINA WIANT
Executive Director

MEETING NOTICE
AGENDA

MEETING DATE:
December 11, 2024

TIME:
9:30 a.m. or upon Adjournment of the California Debt Limit Allocation Committee Meeting

LOCATION:
901 P Street, Room 102
Sacramento, CA 95814

Members of the public are invited to participate in person, remotely via TEAMS, or by telephone.*

Click here to Join TEAMS Meeting (full link below)

Public Participation Call-In Number
(888) 557-8511
Participant Code:
5651115

The California Tax Credit Allocation Committee (CTCAC) may take action on any item.
Items may be taken out of order.
There will be an opportunity for public comment at the end of each item, prior to any action.

	1.	**Call to Order and Roll Call**
Action Item:	**2.**	**Approval of the Minutes of the October 2, 2024, Meeting**
Informational:	**3.**	**Executive Director's Report** ➢ 2024 CTCAC meeting calendar and award schedule *Presented by: Marina Wiant*
Action Item:	**4.**	**Recommendation for reservation of 2024 second round federal 4% and state LIHTCs. (Health & Saf. Code, §§ 50199.10, 50199.14; Cal. Code Regs., tit. 4, § 10310.)** 4% Recommendation List *Presented by: Carmen Doonan*

Action Item: **5. Resolution No. 24/25-02 to adopt a regular rulemaking for new Regulation 10336 and amendments to the existing federal and state LIHTC programs regulations (Cal. Code of Regs., tit. 4, § 10300 et seq.). (Health and Saf. Code, § 50199.17.)**
Presented by: Anthony Zeto

Action Item: **6. Resolution No. 24/25-03 to adopt the CTCAC/HCD Opportunity Area Map for Calendar Year 2025. (Cal. Code Regs., tit. 4 § 10302.)**
Presented by: Anthony Zeto

7. Public Comment

8. Adjournment

FOR ADDITIONAL INFORMATION

CTCAC
901 P Street, Suite 213A, Sacramento, CA 95814
(916) 654-6340

This notice may also be found on the following Internet site:
www.treasurer.ca.gov/ctcac

*Interested members of the public may use the call-in number or TEAMS to listen to and/or comment on items before CTCAC. Additional instructions will be provided to participants once they call the indicated number or join via TEAMS. The call-in number and TEAMS information are provided as an option for public participation.

CTCAC complies with the Americans with Disabilities Act (ADA) by ensuring that the facilities are accessible to persons with disabilities, and providing this notice and information given to the members of CTCAC in appropriate alternative formats when requested. If you need further assistance, including disability-related modifications or accommodations, please contact CTCAC staff no later than five calendar days before the meeting at (916) 654-6340. From a California Relay (telephone) Service for the Deaf or Hearing Impaired TDD Device, please call (800) 735-2929 or from a voice phone, (800) 735-2922.

Full TEAMS Link

https://teams.microsoft.com/l/meetup-join/19%3ameeting_NmYzNzNhYjItZTJiNC00NjlhLWEzYjAtMjQ2YzIxYmVlNWRi%40thread.v2/0?context=%7b%22Tid%22%3a%223bee5c8a-6cb4-4c10-a77b-cd2eaeb7534e%22%2c%22Oid%22%3a%22838e980b-c8bc-472b-bce3-9ef042b5569b%22%7d

AGENDA ITEM 2

Approval of the Minutes of the October 2, 2024, Meeting

California Tax Credit Allocation Committee

901 P Street, Room 102
Sacramento, CA 95814

October 2, 2024

CTCAC Committee Meeting Minutes

1. *Agenda Item:* **Call to Order and Roll Call**

The California Tax Credit Allocation Committee (CTCAC) meeting was called to order at 9:33 a.m. with the following Committee members present:

Voting Members:	Fiona Ma, CPA, California State Treasurer, Chairperson Evan Johnson for California State Controller Malia M. Cohen Michele Perrault for Department of Finance (DOF) Director Joe Stephenshaw Department of Housing and Community Development (HCD) Director Gustavo Velasquez Tiena Johnson Hall, Executive Director for the California Housing Finance Agency (CalHFA)
Advisory Members:	County Representative Michelle Whitman City Representative Brian Tabatabai

2. *Agenda Item:* **Approval of the Minutes of the August 6, 2024, Meeting** – *(Action Item)*

Chairperson Ma called for public comments:

Victor Mendez said he is a resident at 2222 East First Street, Santa Ana, CA 92705, which is a project that receives $5.6 million in federal tax credits annually. For 90 days he has been trying to get CTCAC staff to examine many problems at the property, including drugs, prostitution, and crime. Mr. Mendez has presented a case to Marina Wiant, Executive Director. The property is a mess, and it is unsatisfactory. A lot of people are at risk. Mr. Mendez has been contacting both local and federal agencies, and he wants the state to do its job. After 90 days, nothing has been done and there has been no substantial effort made to get this resolved. He has been told by staff that they are trying to reach the property manager. This is a serious situation and there are a lot of problems going on, and Mr. Mendez wants the state to protect the taxpayers and the 500 senior citizen residents from mismanagement by the property management and owner.

Chairperson Ma asked Mr. Mendez to repeat the property address.

Ms. Wiant said staff has the address; the Compliance team has been working with the owner of the property.

Mr. Mendez repeated the address and said the property owners are AMG, Jamboree Housing, and TPC.

Chairperson Ma said the Compliance Department is looking into this right now.

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Mr. Mendez said he knows that they have been looking into it for 90 days and nothing has been done, which is why he has called in to the meeting today. There are frail and elderly people at risk, and there are people with guns and concealed weapons permits. It is not a very good place, and there are drugs all over the place.

Jennifer La Pointe said she is a resident at 2222 East First Street, Santa Ana, CA 92705. She would like to know where the Compliance Department is; there is a vulnerable, elderly population at the property, and they have been living with drugs, crime, and inept management for three years. The management program needs to be changed and the residents want to know how it can be done.

Chairperson Ma closed public comments.

MOTION: Ms. Perrault motioned to approve the minutes of the August 6, 2024, meeting, and Mr. Velasquez seconded the motion.

The motion passed unanimously via roll call vote.

3. *Agenda Item:* **Executive Director's Report**
   Presented by: Marina Wiant

Marina Wiant, Executive Director, announced two new staff members, Sal Angrisani and Cameron Kalagher. CTCAC is now close to being fully staffed. Additionally, Ms. Wiant has been participating in several regional housing conferences throughout this conference season, alongside Director Gustavo Velasquez and Director Tiena Johnson Hall. They all participated in the San Joaquin Valley Housing Collaborative Affordable Housing Summit and the San Diego Housing Federation (SDHF) Annual Affordable Housing and Community Development Conference, and they are looking forward to being on panels together at the Non-Profit Housing Association of Northern California (NPH), Southern California Association of Nonprofit Housing (SCANPH), and California Coalition for Rural Housing (CCRH) conferences.

Chairperson Ma called for public comments:
None.

4. *Agenda Item:* **Discussion and consideration of appeals filed under California Code of Regulations, title 4, section 10330 for reservations of 2024 second round federal nine percent (9%) low-income housing tax credits (LIHTC) and the impact of any granted appeals on the proposed recommended reservations in Item 5. See Exhibit A for project list, subject to change. –** *(Action Item)*
   Presented by: Anthony Zeto

Mr. Zeto explained that Pacific Street Apartments Nine (CA-24-169) was disqualified because the application failed to meet a basic threshold requirement in CTCAC Regulations Section 10325(f)(8), and the project has submitted an appeal. The appellant was supposed to be on the line today, but they are not here.

Chairperson Ma said this item would be skipped until the appellant was available to speak to the Committee.

Ms. Wiant said the Committee's action on this item would impact the next item.

Chairperson Ma asked the staff to try to get the appellant on the phone or Teams.

Ms. Wiant said the Committee could hear Item 6 in the meantime.

The Committee skipped to Item 6.

6. *Agenda Item:* **Resolution 24/25-01 to establish a waiting list of pending applications pursuant to California Code of Regulations, title 4, section 10325, subdivision (h) for a reservation of 2024 second round federal 9% and state LIHTCs and delegating authority to the Executive Director to approve reservations for projects on the Waiting List, provided that credit remains available and those applications are complete, eligible and financially feasible –** *(Action Item)*
Presented by: Anthony Zeto

Mr. Zeto explained that the Committee has approved waiting lists annually. Staff is recommending establishment of the waiting list, which would also delegate authority to the Executive Director to approve projects from the waiting list to ensure that the federal tax credits are utilized by the end of the year. This would allow staff to not have to bring projects back to the Committee and instead allow the Executive Director to approve the projects administratively. The projects are presented on the list in rank order.

Chairperson Ma said this is standard practice.

Chairperson Ma called for public comments:
None.

Mr. Zeto clarified that the waiting list is subject to change.

MOTION: Mr. Velasquez motioned to adopt Resolution 24/25-01, and Mr. Johnson seconded the motion.

The motion passed unanimously via roll call vote.

7. *Agenda Item:* **Public Comment**

Harvey McKeon from the Nor Cal Carpenters Union (NCCU) said he is here today to talk about labor exploitation in residential construction, including LIHTC-backed projects. In August, an LA court issued an arrest warrant for the owner and payroll manager of US Premium West. The Attorney General has charged these individuals with 31 felony counts, including wage theft, forgery, and tax fraud, totaling over $2.5 million. This is not a fly by night contractor; this contractor has worked with entities on numerous occasions that may sound familiar, such as Integrated Community Development, Corporation for Better Housing, and BLH Construction. On at least three projects, these entities that contracted with US Premium West received state LIHTC allocations of over $35 million and federal LIHTC preliminary reservations totaling roughly $7.5 million or $75 million over 10 years. That is roughly $100 million in total tax credit assistance for projects involving a contractor that is now the subject of 31 felony charges and arrest warrants for two individuals associated with the business.

Mr. McKeon said that in this round alone, there are players such as Danco Communities being recommended for tax credit financing. Even a cursory glance at federal records would reveal that Danco was the subject of recent wage and hour division violations and conceded to pay substantial back wages to 14 affected workers. Mr. McKeon asked if this is the type of player the Committee wants to invite into

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local communities with public funding. Another player on the waiting list today is Pacific West Builders. Mr. McKeon reminded the Committee that he came here in May and explained how an entity affiliated with Pacific West Builders certified to CTCAC that it was required to pay prevailing wages and then turned around and attempted to avoid those obligations to workers. The Department of Industrial Relations (DIR) has now confirmed that this was not lawful. This type of behavior not only holds workers in contempt but also California's state institutions, which some bad actors arrogantly assume will not look out for the workers harmed by bad business practices. Caleb Roope of Pacific West Builders has characterized California as a state where "laws are ignored and businesses can't count on government to keep its word." Mr. McKeon expects, contrary to what such individuals think, that the state will pursue remedies for harmed workers in residential construction, and in CTCAC's case, avoid subsidizing entities that will cheat and steal from workers. One of those workers has come to the meeting today to tell his story about a separate incident involving a different contractor. Mr. McKeon thanked the Committee for engaging with his organization and the workers.

Cesar Sanchez, Field Representative at NCCU, said he is here today because the Committee will hear testimony from a harmed worker, Hector Perez, who has bravely come today to share his experiences working for another subcontractor, West Coast Rival. This subcontractor also worked on LIHTC projects, including two led by developers Integrated Community Development and Corporation for Better Housing, as well as general contractor ELH Construction, for which US Premium West was operating. Mr. Sanchez thanked the Committee for hearing the workers; many more workers also stand behind them who routinely suffer due to low standards in residential construction. This harms not only the workers, but also the taxpayers to whom the Committee is answerable. Each year, construction worker families disproportionately rely on public safety net programs at an annual cost to California of around $4 billion. Nationally, 1.1 to 2.1 million construction workers are estimated to be misclassified or paid off the books. This poses a significant cost to individual workers through lost workers' compensation insurance, unemployment insurance, and overtime pay. State and federal social insurance programs meanwhile also rely on employer taxes.

Hector Perez gave his public comment in Spanish, which was translated by Mr. Sanchez. Mr. Perez said he was a victim of wage theft when he worked on two affordable housing projects funded by the State of California. These projects are in Santa Rosa and are known as Santa Rosa Apartments and Kawana Springs Apartments. Mr. Perez was working for West Coast Rival, which was not paying overtime or allowing him to take any breaks. He was working at least 10 hours a day, and he was never given any benefits, even though the company was deducting money for benefits from his paycheck. He needed medical and dental treatment when he was working, but since he did not have any benefits, he had to pay out of pocket. Currently, he is asking for Medi-Cal.

Anthony Carroll, Field Representative at NCCU, said developers and contractors receiving millions of dollars of public subsidies through the tax credit program have been caught committing or allowing labor exploitation for their own profits. The Committee has also heard the voices of those affected by that labor exploitation. Mr. Carroll thanked them for being brave enough to share their stories. NCCU has been advocating for years to require prevailing wages and enhanced enforcement mechanisms on state LIHTC-backed projects. Such changes would make these projects less prone to labor exploitation, first by setting a wages and benefits standard that would level the playing field for high road contractors, and second by increasing the ability of the private Labor Management Compliance Council (LMCC) to pursue legal action against companies whose business model relies on cheating workers. The lack of strong labor standards has a clear negative effect on workers.

Mr. Carroll said that nearly half of California construction worker households have at least one member dependent on a social safety net program, which costs the state upwards of $4 billion per year. Additionally, safety net dependency is concentrated among residential contractor employees whose pay is 30% less on average than non-residential specialty contractor workers. NCCU's priority for this legislative cycle, AB 3190, would attach strong labor standards to all statewide tax-funded projects. The need for this type of policy was affirmed by its passage in the California State Assembly and the California State Senate, and by being signed into law by the Governor. Unfortunately, this law will not go into effect because it had a companion bill that was not signed into law. NCCU believes that CTCAC should feel just as strongly about ensuring that LIHTC funds are not used just to fund affordable housing but also to lift up the residential construction workers who build that housing. Addressing California's housing crisis will require the Committee to do both. Mr. Carroll is looking forward to working with CTCAC staff in the upcoming year to refine improvements to the regulations and to gain the Committee's support in NCCU's legislative effort to end practices that for too long have allowed billions of dollars – $2.5 billion of state LIHTC funds from 2020-2023 – to be awarded without any prevailing wage or other labor standards.

Jan Harnik said she would like to comment on Item 4.

Chairperson Ma said the Committee will go back to that item and asked Ms. Harnik to hold her comment until then.

Ms. Perrault said prevailing wages are enforced by the DIR, but she asked the staff to consider whether CTCAC could do anything on that issue.

4. *Continuation of Agenda Item:* **Discussion and consideration of appeals filed under California Code of Regulations, title 4, section 10330 for reservations of 2024 second round federal nine percent (9%) low-income housing tax credits (LIHTC) and the impact of any granted appeals on the proposed recommended reservations in Item 5. See Exhibit A for project list, subject to change.** *– (Action Item)*
Presented by: Anthony Zeto

Mr. Zeto said Pacific Street Apartments Nine (CA-24-169) was disqualified because it failed to meet basic threshold requirements for deferred-payment financing. A representative from the project is available to explain the appeal.

Jeanne Blake, Director of Project Finance at Community HousingWorks, apologized and said Kevin Leichner, Vice President of Development, intended to be at the meeting in person but was delayed in his travel. Tony Kouot, Senior Financial Consultant at California Housing Partnership (CHP), is at the meeting in person today. Ms. Blake said she and Mr. Kouot worked closely on the 4% and 9% applications for the Pacific Street Apartments hybrid project. She thanked Ms. Wiant and Mr. Zeto for the time and effort they put into reviewing this application and the subsequent appeals.

Ms. Blake said that as a San Diego-based public benefit nonprofit, Community HousingWorks is a developer and long-term owner of close to 5,000 deeply affordable apartments, including hundreds set aside for special needs, permanent supportive housing, and extremely low-income residents. Community HousingWorks has successfully applied for and closed on dozens of tax credit reservations during 36 years of service to the community. The project has a 4% allocation in hand, and if this appeal is granted, the developer can proceed with building the 110 apartments in Rocklin in Placer County, which is a high resource location. This was the only high resource application in the Capital Region this round, as well as the only hybrid application in the region. Hybrid projects are vitally important because they stretch scarce

9% resources and make large projects possible in regions like this one with limited local subsidy. If the appeal is not granted and the project does not receive the 9% tax credit award today, the project will have to return its 4% award, the development agreement with the city will expire shortly, and these 110 affordable units may never be built.

Ms. Blake said the error made in the application was extremely minor and represented $1.2 million out of a total financing stack of $59 million, which is only 2% of the total. If the project did not obtain the Affordable Housing Program (AHP) award, the uncommitted $1.2 million would be more than covered by some combination of the developer fee deferral and/or contingency. Lenders and investors treat the developer fee as one source of contingency to balance the sources and uses, and it is always at risk until a project is completed. Beyond that, if the project had made some minor changes to its interest rate assumptions in the 9% application, the $1.2 million would have already been covered because there was enough cushion in that area alone. AHP could have been skipped as a source and the project would not have been here today. These are technically complex applications, and for hybrid projects, the technical complexities are compounded. A single project must be creatively split between 4% and 9% financing applications, and the regulations and hybrid guidance can sometimes be unclear and occasionally conflict. Some permanent financing sources, for instance, can be shown in a 4% application as uncommitted. That is not necessarily the same in a 9% application, but it is not entirely clear. There are regulations and policy memos that encourage the 4% and 9% components to be combined and considered together, and this combined approach affects various topics, such as project scoring, the tiebreaker calculation, the market study, the developer fee calculation, etc.

Ms. Blake said that thinking a small uncommitted source could be included in the 9% portion of the hybrid project was simply a minor mistake. With technical complexities, intelligent and experienced people still make mistakes, which is why there are provisions within the regulations to address technical errors and allow feasible projects, such as Pacific Street Apartments Nine, to move ahead. Section 10327(a) of the regulations has a provision for initial application errors to be considered covered by contingency. Contingency is built into the numbers in multiple places at the time of the application, including hard and soft contingencies, contingencies within larger budget line-items, interest rate cushion, and developer fee. Considering the 9% application independently, the combined cushion provided by hard and soft contingencies, along with the developer fee, is more than sufficient to meet the requirements of Section 10327(a) and cover AHP should it not be awarded. That does not account for contingency and developer fee within the 4% application. Again, this project is financially feasible. Additionally, as a hybrid project, the 4% and 9% financing components are inseparable, and thus, their contingencies, like their developer fees, should be considered jointly. While there are many areas in the regulations that do not address hybrid projects specifically, including Section 10327(a), those sections that do address hybrid projects point to considering the entire project, including both the 4% and 9% components, in the aggregate. By extrapolation, it would be reasonable to interpret that the authority in Section 10327(a) to cover an application error with contingency should also consider contingency in the aggregate.

Ms. Blake said it is well within the Committee's authority to exercise forgiveness for this application error, and one of two approaches in applying Section 10327(a) could be taken. They could look at contingency broadly within the 9% application alone, considering the numerous areas where contingency is provided for in the numbers. Alternatively, they could look at regulations that call for combining the applications for a hybrid project and consider the 4% and 9% contingencies in the aggregate. Regardless of the approach chosen, there is definitely ample cushion in the budget to cover the $1.2 million AHP funding. Ms. Blake appreciates the Committee's consideration, and the decision to appeal was not made lightly. As 110 affordable units in a high resource location in Placer County are on the line and might never be built if this appeal is denied, the developer knew they needed to advocate for this project. They are sensitive to the impact on the rest of the awardees, but this project has the highest tiebreaker in its region and yields the most new affordable homes. But for this application snafu, this project in Rocklin would have been awarded. The developer also acknowledges that the Inland Empire scoring may also be affected if the outcome changes. CTCAC staff has indicated that a worthwhile project that will provide 88 permanent supportive housing apartments in Moreno Valley will be funded in addition to Pacific Street Apartments Nine. Ms. Blake thanked the Committee for considering the appeal.

Chairperson Ma asked Tony Kouot if he would like to make any comments.

Mr. Kouot said he would be available to answer questions.

Chairperson Ma said this is an unusual case because it is a hybrid. She had a long conversation with Ms. Wiant about this, and if a project does not receive either the 4% or 9% award, it will not receive the other.

Ms. Perrault said she wants to make sure she understands the process. She asked if the developer does not know yet whether the project will receive AHP funding.

Mr. Kouot said that is correct.

Ms. Perrault said it was indicated that if that funding did not come through, the developer would be seeking additional builder's fees. She asked if those had been secured.

Mr. Kouot said they have not been secured.

Ms. Blake said the developer would be looking to close the gap within the cushions in the application. The regulation she cited previously allows contingency to be used for application errors, so the developer would like to use contingency. They could either combine the contingency from the 4% and 9% applications or take a broader view of contingency to include the hard and soft contingency developer fee, which is already in the project and could be deferred, along with other contingencies that are built into the numbers and include a large cushion in interest reserve. Within the numbers alone, the developer could cover the $1.2 million.

Ms. Perrault asked the staff, in terms of combining the 4% and 9% applications, if there would still be a gap that would need to be overcome.

Ms. Wiant said the regulations allow an application change under certain circumstances, and the appellant is citing the regulation that would allow the use of the contingency fee. The contingency fee, as articulated in the 9% application portion of the hybrid project, is insufficient to cover the $1.2 million gap. The developer is requesting consideration of the contingency that was in the 4% application as well. Staff denied that request because they felt that since it was not included in the 4% application, it would essentially also be changing that application, and that allocation was already made. As Ms. Blake articulated, the question is whether contingency can be considered more broadly, and if the Committee would consider using the entirety of the deferred developer fee to cover the gap, in addition to the contingency amount.

Ms. Perrault said she understands the constraints in Placer County, and particularly in Rocklin, but her understanding is that if the Committee grants the appeal, two other projects on the recommendation list will be replaced. She asked if that is correct.

Mr. Zeto responded affirmatively. The other project in the region that is currently on the list would be bumped. Additionally, two other projects in the Inland Empire region would switch places, meaning one project that is not on the list would be added to the list, and the project currently on the list in that region would be removed. Two projects would be removed from the list, while Pacific Street Apartments Nine and a different project would be added.

Chairperson Ma asked how many other applicants make minor mistakes or technical errors.

Ms. Wiant said staff regularly disqualifies projects for errors.

Ms. Johnson Hall said she is torn about this project, but she does not believe it is an underwriting issue. It is an error issue. She looked back at 2022 and 2023, and there were several projects that were submitted with errors and they were unilaterally turned down.

Chairperson Ma asked if that happened here at this Committee.

Ms. Johnson Hall responded affirmatively. She looked back at projects that were reviewed since she has been part of this Committee since 2021. She is struggling because Rocklin is one of the toughest places to build affordable housing, and unfortunately, if this project does not go forward today, it is likely that it will not go forward, period. However, two more projects will be awarded in other areas, so the Committee will effectively be meeting the need, but not in Rocklin or Placer County. That is concerning to Ms. Johnson Hall, especially as someone who has lived experience in this area. She does not want to see any projects not come to fruition. The challenge she is having is that the regulations still are not clear, although the Committee has looked at this before. They need to make sure that they do not face this again, because effectively they are slowing down or impeding the progress of affordable housing in areas where it is needed most. Ms. Johnson Hall stands with the staff on this decision because she does not want the Committee to set precedent. That is hard for her to say, given her experience in this area, and also because she knows this developer has done a lot of great work. She wanted to share her experience as a practitioner. These are hard calls to make, and she commends staff for making the hard call, but she thinks the Committee needs to go back and look at the language in the regulations and make sure they are accountable.

Ms. Wiant asked Ms. Johnson Hall if she is referring to the language specifically cited as the reason for the appeal or language around hybrid projects more generally.

Ms. Johnson Hall said she is referring to the language around hybrid projects in general.

Ms. Wiant said one of the challenges is that now that the 4% program is competitive as well as the 9% program, hybrids are competing in two competitions now. When the hybrid model was originally conceived, hybrids were intended to be 9% projects augmented by 4% tax credit equity that came alongside the 9% tax credits at the same time, rather than sequential awards.

Ms. Johnson Hall said there are new problems now because of scarcity and more deals that are coming to the table simultaneously. This developer has tried to put together a package that works based on that scarcity and need, and the Committee probably needs to revisit the language in the regulations.

Ms. Blake said she agrees that some revisions to the regulations are warranted, in terms of how hybrid applications are addressed. However, there was a similar appeal approved in June 2019 for CA-2019-700. The makeup of the Committee was different at that time. Staff may not think it is applicable, but at that time, the sponsor appealed a disqualification as a result of including uncommitted AHP funds in both construction and permanent financing sources. Construction was a threshold issue, and the basis of that appeal was a misinterpretation of the regulations. That appeal was successful, so there is potentially some precedent for this.

Ms. Perrault said her understanding is that the appeal Ms. Blake referenced from 2019 resulted in staff going back and revisiting the regulations and addressing the ambiguity that was in that initial appeal. The regulations have changed since then.

Ms. Wiant said that appeal hinged on specific language in the regulations that has since been changed.

Ms. Whitman said she feels her fellow Committee members' heartache about being in this unenviable position, although she is new to the Committee and an advisory member only. She believes that to ensure fairness to all applicants, this process is objective by design. The appeal has been through several layers of objective reevaluation, all of which resulted in the same conclusion that the application did not meet the basic threshold criteria. That is the green light/red light question here, and all applicants need to know that the goal posts are not going to move throughout this process. There are waterfall effects when subjectivity is introduced to an objective process, and Ms. Whitman has not been able to align with the basis for the appeal, nor the consequences of granting it, although she tried. Her hat is off to any project sponsors looking to develop affordable housing, particularly in a high resource area, which tends to be more difficult. Like many of the people in the meeting today, she has firsthand experience and knows what it feels like when a project is ready to go but for funding. That is the unfortunate reality, and it puts the Committee and staff in the unenviable position of having to say no sometimes to an appeal. Ms. Whitman feels confident in staff's recommendation to deny the appeal in this instance.

Mr. Tabatabai said this is a competitive process, and all the projects are excellent. However, the developers also need to know that the process is going to be consistent and that the procedures in place will be followed. This will result in some very good projects being denied. As long as there is consistency, developers will know that the rules will be applied in the same manner, no matter where they are applying from, and these mistakes can be avoided going forward. There is value in all the projects that come before the Committee, and Mr. Tabatabai wishes they all could be approved because they are all needed. Staff has done a great job of looking at the appeal, and the decision has been made in a way that is consistent with procedures that everyone can feel comfortable with. It is not an enviable role to deny these projects because they are all needed, but the funds are scarce, and the Committee needs to maintain consistency.

Chairperson Ma called for public comments:

Jan Harnik from the City of Palm Desert said CTCAC has gone through great pains to develop policies and procedures using stringent and meaningful guidelines for these projects. She has heard comments using words such as "unenviable" and "heartache," and she knows these things are true. CTCAC staff is tasked with going through piles of applications, which is surely difficult and at times unenviable. At times, it is surely uplifting to look at these applications as well. Ms. Harnik asked the Committee to abide by the policy and procedure that was put in place so that everyone can count on a consistent process and get these important and worthy projects through.

Sean Spear, President and CEO of Community HousingWorks, thanked the Committee for their patience earlier when members of the development team who were anticipating being at the meeting in person were delayed in their travel. Ms. Blake had to jump in quickly to present the developer's case. Mr. Spear appreciates the comments and consideration of the Committee members as they weigh this issue. As Ms.

Blake articulated, the developer does not make this appeal lightly; they think it is most important to make sure there is a program that developers and project sponsors can rely upon, and to have trust in the judgment of the staff when it comes to the recommendations presented to the Committee. The challenge here is that although there were changes made in 2023 to provide some clarity around how hybrid deals were to be treated, at a time when both programs were competitive, some challenges still remain there. The issue for this particular deal, which was reflected in the 2019 appeal that was granted, is a question of timing and the ability to access the AHP dollars and those commitments, which do not line up with the 9% application timeframes. Mr. Spear knows there are discussions around trying to fix that issue, but in the meantime, this kind of situation can crop up with a deal that may be trying to rely on AHP. The developer looked at it as a relatively small portion of the overall project financing that they felt could be accommodated through an alternative in terms of making changes that are permitted under the program.

Mr. Spear said that while there were changes made to the regulations in 2023, some areas with a lack of clarity still remain. When it comes to a situation such as this, where there is lack of clarity between the 9% and 4% programs, staff's discretion can come in, in terms of their recommendations. This is not exactly a black and white situation, and he feels that the staff has discretion here. This would align with what has been professed by the state in terms of making sure that affordable housing is provided throughout the state, and particularly in areas that have historically have not welcomed affordable housing, which is a worthy policy goal in addition to the merits of this project. Mr. Spear recognizes that other projects are being affected; two projects would potentially be funded in one scenario, and two other projects would be funded in a different scenario if this appeal were denied. That is the nature of a competitive program. Mr. Spear asked the Committee to consider some of the broader statewide policy issues, as well as the fact that there is some ambiguity in the regulations in terms of hybrid projects. Community HousingWorks would welcome the opportunity to participate in some working groups that could fix some of these issues, but in the meantime, they do not feel that this project should be penalized for that lack of clarity.

William Leach from Kingdom Development said he serves as a financial advisor in the industry. He has assisted in financing three successful hybrid deals in the past, and they are very complicated. The appellant's logic in using Section 10327 for a hybrid project in the aggregate is a consistent use of the regulations. The hybrid incentives provided in the regulations for stretching the resources and using both the 9% and 4% structures provide half a dozen measures where the 9% application is supposed to open up the 4% application, get numbers from the other phase, and measure them in the aggregate. The provisions require things in the aggregate and ask for additional affordability in the aggregate. The 4% applications have to give up things so that the 9% project can enjoy the competitive advantage and be considered. As the Committee has heard before, these 110 units can only be built together in the aggregate. Looking at the market study guidelines, the 9% regulations state that it is done in the aggregate. The tiebreaker and housing type are also considered in the aggregate. In Section 10327(a), where it states that errors are allowed to be covered by contingency, the regulations are silent. The regulations are not silent because it is not appropriate for hybrids to be considered in the aggregate; every other aspect of the regulations referring to hybrids considers the aggregate. Mr. Leach does not fault staff for saying that the regulations are silent on the matter, and they cannot help, but the Committee can step in and say that every other regulation about hybrids is considered in the aggregate. The regulations state that the 9% application will look at the 4% application at the time of submission and take data out of it. It is not reaching to ask for this error to be reviewed in the aggregate.

Ms. Johnson Hall asked if the General Counsel could speak on this regulation. Ms. Johnson Hall had been reviewing Section 10325, but Mr. Leach referenced Section 10327.

Joe Boniwell, Attorney for CTCAC, said he is happy to be here at his first meeting. The regulation in play for the Committee today is Section 10327(a), which is what Mr. Leach cited. There are three instances in the regulations where the Committee can change an application, one of which is Section 10327(a). This is the section that allows the Committee to fix minor application errors. When Mr. Boniwell went back and looked at the regulation history, he found that it was focused on calculation errors or minor mathematical errors. Where there is a gap in funds, the contingency line item in the budget can be used up to $100,000 or 50%, whichever is higher, to close that gap. Staff denied the appellant's argument to interpret that regulation as allowing them to reach back to the line item in the 4% application to combine it with the line item in 9% application, which would get them to about 46%. This would be just under 50% of the combined line items and would allow them to meet the missing AHP funds.

Mr. Boniwell said that in order to get to the analysis he described, the Committee would have to determine that the representation in the application that the AHP funds had not been applied for yet, which was a missing basic threshold requirement, was an application error such that it could be corrected by this line-item contingency. Then the Committee would have to interpret the line-item contingency correction more broadly than the plain language, which would allow the Committee to reach back to the line-item contingency from the 4% application and pull it to the 9% application to combine them. Mr. Leach discussed the other sections in the regulations and contemplated pulling aspects from both applications. The regulations seem very intentional about where aspects of the 4% and 9% applications can be pulled together. Mr. Boniwell would advise that it had not been contemplated by the Committee that the contingency could be pulled from the 4% application to the 9% application since the regulations do not provide for that.

Chairperson Ma said she is hearing that this would not necessarily set precedent because this is new and is not used very often, but it is also not stated specifically in the regulations.

Mr. Boniwell said it would not set precedent in that the Committee can make an application change under this provision, but it would set precedent in the interpretation of what an application error is. It would basically make it clear that an error is more than a mathematical error – it is missing documentation. It would also set precedent that this reference to line-item contingency in hybrid projects means the contingency in both the 4% and 9% applications.

Chairperson Ma asked if this could be addressed in further regulations if the Committee granted the appeal for this project.

Mr. Boniwell said it is a policy consideration as to whether it is appropriate for a line-item in the budget, such as the contingency, that has already been approved in one project, to be used in a second project.

Chairperson Ma said there are two projects basically dependent on each other.

Ms. Wiant said the challenge staff had is that the 4% project is complete and included a particular contingency line-item, and the 9% application included a particular contingency line-item. They could have been merged and distributed at the time of application differently between the 4% and 9% applications. Because the regulation is specific to the contingency budget line-item of the application, staff did not feel that they could pull the contingency from another project. There are two different applications.

Ms. Johnson Hall ask for clarification that there were two applications for one project.

Ms. Wiant responded affirmatively. There are certain things that can be split, and there is guidance on that. For example, the developer fee can be considered in the aggregate and distributed however the applicant would like between the two applications. The application is then solid based on those numbers.

Chris Dart from Danco Communities said he represents Central Sacramento Studios II (CA-24-116), the project that will be removed from the recommendation list if Pacific Street Apartments Nine is awarded. Central Sacramento Studios II is the second phase of the project; the first phase was a Homekey project consisting of 92 units at 12th and H Street in Sacramento. The second phase will provide an additional 52 units. The project is ready to go with all financing committed and just needs the building permit. This project is also deserving. In response to comments made earlier in the meeting, Mr. Dart clarified that Danco Communities is in full compliance with all prevailing wage requirements on all projects.

La Shelle Dozier, Executive Director of the Sacramento Housing and Redevelopment Agency (SHRA), said SHRA is the gap financer for Central Sacramento Studios II. All the projects are deserving, and it is always hard, but Central Sacramento Studios II is a complement to a Homekey project that is doing very well. This project would increase permanent supportive housing in the downtown core, which is struggling with homeless individuals and blight. Ms. Dozier asked the Committee to support staff's recommendation. It was a hard decision made by the staff. SHRA has been in this same spot with other projects, and because of the regulations, they have had to go back to the drawing board as well. While Ms. Dozier empathizes with the other applicant, she thinks there is consistency that everyone needs to understand, and everyone needs to play by the same rules.

Tony Kouot from CHP said he is the financial consultant for Community HousingWorks on Pacific Street Apartments Nine. He expressed appreciation for the staff and Committee's consideration of this project and reiterated that the CTCAC regulations are unclear on hybrid projects and the specific requirements for various areas. That is the issue that caused confusion here. The hybrid guidance provided by CTCAC is outdated in various areas on the website, and in particular, there are areas in which Mr. Kouot feels like there is not enough direct guidance on how hybrid projects are treated. There are differences for 4% and 9% projects, but hybrid projects are often treated in the aggregate, and they are inseparable from each other. In reality, when the projects are in development, they support each other across line items and contingencies, and that is apparent in certain sections of the regulations. It is not clear in Section 10327(a) that they should be treated separately.

Alejandro Martinez from Coalition for Responsible Community Development said the Committee is in a tough spot and he does not envy their position. He recalls that in 2001, he had a project that did not receive an allocation. Right before the Committee hearing, he was notified by CTCAC that there was a technical mistake in another application, and his project would receive an allocation. He immediately flew out here and ended up sharing a cab with the other developer that got bumped, and it was an awkward ride. Although he does not have a dog in this fight, he has been in a similar position, and it is scary, especially after having spent a lot of staff time and resources on a project, ultimately to have it not be considered due to a technicality or mistake. He asked if the Committee or staff has considered potentially giving a forward commitment to fund a project next year. He is wondering how the Committee could fund the other two projects while also funding this project that could potentially die and may not be viable if the appeal is not granted. He asked if the Committee has thought about what the precedent would be for this situation and what the ramifications would be. He would hate for what sounds like a great project to not be awarded, but at the same time, he would feel horrible if the other two projects got bumped.

Chairperson Ma closed public comments.

Chairperson Ma said the Committee has been flexible when there have been unexpected circumstances like COVID-19, fires, floods, and even unexpected issues with government agencies, such as when the USDA moved offices and was not working on applications. Those were circumstances beyond applicants' control. This situation is different because there was a technical error with the inclusion of the AHP funding. However, it is not completely clear, which is why the Committee is here. Chairperson Ma asked if this would be a trend moving forward or if it is an anomaly.

Mr. Velasquez said the hybrid nature of the project is not an anomaly, but the consideration of the appeal is an anomaly. That is what is hard about this.

Ms. Wiant said that as counsel articulated previously, the intent behind the section of the regulations that allows for the correction of mistakes was that it would apply to calculation errors. That is why the threshold at one point was $50,000 and then was bumped to the greater of $100,000 or 50% of the contingency line-item. It was not considered to fill funding gaps.

Mr. Zeto said he could provide some history on this issue. There is a line-item that requires building in a three-month capital operating reserve. He recalls that there was a project that did not have a sufficient amount, so it was raised up, which created a gap. This regulation was meant to fix issues like that.

Mr. Johnson said he has not spoken up yet because he shares everyone's sentiments that this is a terrible decision to have to make. All the projects are deserving, but he feels compelled by the significance of predicable regulations and their implementation. Unfortunately, it seems like there is a lack of clarity here. He reiterated Ms. Johnson Hall's comment that if there is a lack of clarity, the Committee needs to provide guidance on regulations that are predictable so that everyone knows how to run their processes to be competitive in the CTCAC process. That is important, but the regulations are what they are right now, and he is compelled to view them as they are written and as staff interpreted them, rather than creating a new interpretation in this case and setting precedent.

MOTION: Ms. Perrault motioned to deny the appeal.

Ms. Perrault said it is a difficult situation. She agreed with Mr. Johnson that if there is a lack of clarity in the regulations, the Committee can ask staff to work toward what they have heard today and come back to the Committee in the future with recommendations to create more specificity in the regulations. She does not think this is the time to do it with this one case today.

Ms. Wiant said the Committee could choose not to take action on this item. One option would be an affirmative denial versus not making a motion to grant the appeal.

Mr. Velasquez said the Committee has chosen to take no action on items before. The next item would basically override the consideration of the appeal since it would be approving the projects as shown on the recommendation list.

Chairperson Ma asked for clarification that this project is not on the list right now.

Ms. Wiant said that is correct.

Ms. Perrault withdrew her motion.

The Committee took no action on this item.

5. *Agenda Item:* **Recommendation for reservation of 2024 second round federal 9% and state LIHTCs, subject to change if appeals are granted under Item 4. (Health & Saf. Code, §§ 50199.10, 50199.14; Cal. Code Regs., tit. 4, § 10310.) –** *(Action Item)*
Presented by: Carmen Doonan

Ms. Doonan reported that staff is recommending 25 projects for reservation of 9% federal and state tax credits. The projects will provide approximately 1,562 total units.

Chairperson Ma called for public comments:
None.

MOTION: Ms. Johson Hall motion to approve staff's recommendation, and Mr. Johnson seconded the motion.

The motion passed unanimously via roll call vote.

7. *Continuation of Agenda Item:* **Public Comment**

Chairperson Ma reopened general public comment:
None.

8. *Agenda Item:* **Adjournment**

The meeting was adjourned at 10:52 a.m.

DRAFT

California Tax Credit Allocation Committee

AGENDA ITEM 3

Executive Director's Report

- **2025 CTCAC meeting calendar and award schedule**

California Tax Credit Allocation Committee

2025 Meeting Schedule and Application Due Dates

Meeting location will be posted on each agenda*

Nine Percent (9%) Application Deadline for Corresponding Meeting Date	Four Percent (4%) Application Deadline for Corresponding Meeting Date	2025 CTCAC Committee Meeting Dates/Times*	Proposed Rounds and Topics**
		January 15, 2025 1 p.m.	Agenda Items
		March 4, 2025 1 p.m.	Agenda Items
	January 28, 2025	April 8, 2025 1 p.m.	**4% Awards** Round 1 **(No State Credit)**
March 18, 2025		June 18, 2025 1 p.m.	**9% Awards** Round 1
	May 20, 2025	July 29, 2025 1 p.m.	**4% Awards** Round 2
July 8, 2025		September 30, 2025 1 p.m.	**9% Awards** Round 2
	September 9, 2025	November 19, 2025 1 p.m.	**4% Awards** Round 3
		December 10, 2025 1 p.m.	Agenda Items

*CTCAC meetings begin upon adjournment of CDLAC meetings. Meeting locations may change for each meeting date. Please check agendas.

**Meeting dates and times are subject to change with public notice. Topics listed are not necessarily the only topics to be discussed at the meetings. Topics will be posted in the agenda found on the CTCAC Website Meeting Page 10 days prior to the meeting date.

AGENDA ITEM 4

Recommendation for reservation of 2024 second round federal 4% and state LIHTCs. (Health & Saf. Code, §§ 50199.10, 50199.14; Cal. Code Regs., tit. 4, § 10310.)

CALIFORNIA DEBT LIMIT ALLOCATION COMMITEE
Final Staff Recommendations*
To be Considered on December 11, 2024
QUALIFIED RESIDENTIAL RENTAL PROJECTS

NON-GEOGRAPHIC POOLS

BIPOC

ROUND 2 ALLOCATION **$74,150,874** REMAINING *$21,885,067*

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-756	California Municipal Finance Authority	Viscar Terrace Apartments	172	Murrieta	Riverside	$26,865,807.00	$25,400,000.00			$52,265,807.00	120	80.353%	0.000%	$23,316,924	$5,091,936
						$26,865,807.00	$25,400,000.00	$0.00	$0.00	$52,265,807.00				$23,316,924	$5,091,936

PRESERVATION

ROUND 2 ALLOCATION **$120,721,861** REMAINING *$14,827,609*

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-666	California Statewide Communities Development Authority	Brandon Place Apartments	197	Riverside	Riverside	$28,000,000.00				$28,000,000.00	110	161.821%	0.000%	$0	$2,215,168
24-768	California Municipal Finance Authority	Moreland Apartments	160	San Jose	Santa Clara	$55,894,252.00				$55,894,252.00	110	146.746%	0.000%	$0	$4,131,931
24-633	Housing Authority of the County of Kern	Arvin RAD	114	Arvin	Kern	$22,000,000.00				$22,000,000.00	110	132.117%	0.000%	$0	$1,815,621
						$105,894,252.00	$0.00	$0.00	$0.00	$105,894,252.00				$0	$8,162,720

OTHER REHABILITATION

ROUND 2 ALLOCATION **$85,884,811** REMAINING $3,097,811

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-737	City and County of San Francisco	Larkin Pine Senior Housing	63	San Francisco	San Francisco	$13,987,000.00				$13,987,000.00	110	270.828%	0.000%	$0	$1,282,006
24-627	California Municipal Finance Authority	Paseo Senter I Rehab	117	San Jose	Santa Clara	$21,900,000.00				$21,900,000.00	110	260.798%	0.000%	$0	$1,780,278
24-785	California Municipal Finance Authority	San Joaquin Senior, San Joaquin Apartments, and California Apartments	100	San Joaquin	Fresno	$10,000,000.00				$10,000,000.00	110	221.970%	0.000%	$2,043,644	$727,456
24-630	California Municipal Finance Authority	Montecito Village	70	Ramona	San Diego	$15,250,000.00				$15,250,000.00	110	221.108%	0.000%	$0	$1,122,327
24-787	California Municipal Finance Authority	Lake Isabella Senior Apartments I & II	86	Lake Isabella	Kern	$7,750,000.00				$7,750,000.00	110	176.872%	0.000%	$0	$716,565
24-617	California Municipal Finance Authority	Pleasant View Apartments	60	Fresno	Fresno	$13,900,000.00				$13,900,000.00	110	159.119%	0.000%	$0	$1,158,372
						$82,787,000.00	$0.00	$0.00	$0.00	$82,787,000.00				$2,043,644	$6,787,004

RURAL NEW CONSTRUCTION

ROUND 2 ALLOCATION **$69,424,476** REMAINING $2,327,673

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-771	California Housing Finance Agency	4575 Scotts Valley Apartments	100	Scotts Valley	Santa Cruz	$41,923,146.00				$41,923,146.00	120	111.615%	0.000%	$16,138,146	$3,896,318
24-716	California Municipal Finance Authority	Livingston B Street	80	Livingston	Merced	$25,173,657.00				$25,173,657.00	120	99.529%	20.253%	$0	$1,782,651
						$67,096,803.00	$0.00	$0.00	$0.00	$67,096,803.00				$16,138,146	$5,678,969

NEW CONSTRUCTION SET ASIDES

HOMELESS $174,756,034.50

ROUND 2 ALLOCATION **$349,512,069** REMAINING *$7,097,121*

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-754	California Statewide Communities Development Authority	Oak View Ranch Senior Apartments	81	Murrieta	Riverside	$19,066,355.00				$19,066,355.00	120	132.037%	50.000%	$0	$1,737,117
24-600	California Statewide Communities Development Authority	Palm Villas at Millennium	121	Palm Desert	Riverside	$37,593,692.00	$540,000.00			$38,133,692.00	120	110.000%	45.833%	$10,397,147	$3,674,843
24-735	Housing Authority of the City of Los Angeles	Victory Blvd	194	Los Angeles	Los Angeles	$78,697,673.00	$305.00			$78,697,978.00	120	102.381%	45.313%	$19,999,198	$7,014,614
24-738	City of San Jose	Kooser Apartments	191	San Jose	Santa Clara	$72,751,517.00			$956,650.00	$73,708,167.00	120	101.853%	45.503%	$31,579,858	$5,902,201
24-597	Housing Authority of the County of Kern	Pioneer Drive Apartments	85	Bakersfield	Kern	$14,500,000.00				$14,500,000.00	119	149.443%	100.000%	$0	$1,041,975
24-732	Los Angeles County Development Authority	Veteran Commons	100	Downey	Los Angeles	$34,045,000.00				$34,045,000.00	119	136.166%	50.505%	$0	$3,181,709
24-759	Los Angeles Housing Department	Locke Lofts	148	Los Angeles	Los Angeles	$8,353,549.00		$41,646,451.00		$50,000,000.00	119	122.062%	68.493%	$0	$4,123,078
24-731	California Municipal Finance Authority	North Fair Oaks Apartments	86	Unincorporated Redwood City	San Mateo	$34,263,756.00				$34,263,756.00	119	112.925%	45.882%	$0	$2,997,139
						$299,271,542.00	$540,305.00	$41,646,451.00	$956,650.00	$342,414,948.00				$61,976,203	$29,672,676

ELI/VLI

ROUND 2 ALLOCATION **$427,073,527** REMAINING $5,089,054

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-628	California Municipal Finance Authority	Downtown Library Mixed Use Project	124	Santa Cruz	Santa Cruz	$55,616,938.00				$55,616,938.00	120	151.501%	0.000%	$0	$5,113,870
24-670	City and County of San Francisco	Balboa Reservoir - Building E	128	San Francisco	San Francisco	$73,004,348.00				$73,004,348.00	120	126.190%	0.000%	$0	$5,244,316
24-740	California Housing Finance Agency	Westside Village	38	Santa Cruz	Santa Cruz	$18,446,853.00				$18,446,853.00	120	113.087%	0.000%	$7,600,000	$1,648,928
24-601	California Municipal Finance Authority	Dakota	114	Fresno	Fresno	$35,875,300.00				$35,875,300.00	120	103.630%	0.000%	$0	$2,585,113
24-667	California Housing Finance Agency	Wakeland Riverwalk	190	San Diego	San Diego	$70,150,547.00				$70,150,547.00	120	103.268%	0.000%	$10,725,542	$6,875,755
24-602	California Municipal Finance Authority	Almond Gardens Apartments	97	Suisun City	Solano	$30,276,660.00				$30,276,660.00	119	170.091%	0.000%	$5,994,579	$2,917,820
24-653	City and County of San Francisco	850 Turk Street	92	San Francisco	San Francisco	$48,478,327.00				$48,478,327.00	119	150.476%	0.000%	$0	$4,567,466
24-686	City and County of San Francisco	Sunnydale HOPE SF Block 9	95	San Francisco	San Francisco	$57,075,000.00				$57,075,000.00	119	140.166%	0.000%	$0	$5,399,955
24-726	California Statewide Communities Development Authority	Arrowhead Grove Phase IV	92	San Bernardino	San Bernardino	$33,060,500.00				$33,060,500.00	119	132.192%	0.000%	$0	$3,056,472
						$421,984,473.00	$0.00	$0.00	$0.00	$421,984,473.00				$24,320,121	$37,409,695

CALIFORNIA DEBT LIMIT ALLOCATION COMMITEE
Final Staff Recommendations*
To be Considered on December 11, 2024
QUALIFIED RESIDENTIAL RENTAL PROJECTS

NEW CONSTRUCTION GEOGRAPHIC REGIONS

BAY AREA REGION

ROUND 2 ALLOCATION: $224,750,978
REMAINING: $18,303,139

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-681	California Municipal Finance Authority	Walnut Apartments	44	Danville	Contra Costa	$12,750,000.00				$12,750,000.00	120	100.315%	0.000%	$0	$1,032,912
24-736	California Municipal Finance Authority	Distel Circle	90	Los Altos	Santa Clara	$47,511,721.00				$47,511,721.00	120	96.643%	25.000%	$10,431,853	$4,096,134
24-649	California Municipal Finance Authority	Civic Crossing (699 Ygnacio Valley Road)	93	Walnut Creek	Contra Costa	$46,881,118.00				$46,881,118.00	120	89.304%	32.609%	$0	$3,884,742
24-703	California Municipal Finance Authority	Broadway Meadows	97	Millbrae	San Mateo	$46,000,000.00				$46,000,000.00	120	70.963%	0.000%	$0	$4,290,469
24-719	City and County of San Francisco	Sunnydale HOPE SF Block 7	89	San Francisco	San Francisco	$53,305,000.00				$53,305,000.00	119	137.413%	0.000%	$0	$5,121,561
						$206,447,839.00	$0.00	$0.00	$0.00	$206,447,839.00				$10,431,853	$18,425,818

COASTAL REGION

ROUND 2 ALLOCATION: $291,136,346
REMAINING: $4,591,454

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-647	California Housing Finance Agency	The Grant at Mission Trails	48	San Diego	San Diego	$16,993,197.00				$16,993,197.00	120	96.768%	29.787%	$8,617,124	$1,612,900
24-706	California Municipal Finance Authority	Alvarado Creek Apartments	227	San Diego	San Diego	$88,000,000.00				$88,000,000.00	120	93.110%	0.000%	$0	$7,346,018
24-690	California Municipal Finance Authority	Rovina Lane Apartments	32	Petaluma	Sonoma	$11,250,000.00				$11,250,000.00	120	62.241%	0.000%	$0	$1,014,621
24-615	California Housing Finance Agency	Monarch Hillside Affordable Apartments	51	San Diego	San Diego	$13,500,000.00				$13,500,000.00	119	128.689%	0.000%	$0	$1,264,581
24-746	California Housing Finance Agency	Avanzando San Ysidro	103	San Diego	San Diego	$49,000,000.00				$49,000,000.00	119	111.951%	0.000%	$0	$4,609,523
24-757	Anaheim Housing Authority	Tampico Motel Conversion	32	Anaheim	Orange	$13,105,723.00				$13,105,723.00	119	106.531%	100.000%	$0	$1,122,797
24-680	California Municipal Finance Authority	712 Seagaze	179	Oceanside	San Diego	$46,070,813.00				$46,070,813.00	119	99.140%	0.000%	$0	$4,199,366
24-673	California Municipal Finance Authority	Meridian at Corona Station	131	Petaluma	Sonoma	$48,625,159.00				$48,625,159.00	119	92.041%	25.385%	$0	$4,176,167
						$286,544,892.00	$0.00	$0.00	$0.00	$286,544,892.00				$8,617,124	$25,345,973

CITY OF LOS ANGELES

ROUND 2 ALLOCATION: $331,002,518
REMAINING: $19,526,176

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-679	California Municipal Finance Authority	Oaks on Balboa	117	Los Angeles	Los Angeles	$40,000,000.00				$40,000,000.00	120	85.776%	50.000%	$0	$3,567,701
24-608	California Housing Finance Agency	5749 Brynhurst	53	Los Angeles	Los Angeles	$8,065,000.00				$8,065,000.00	119	187.259%	0.000%	$0	$504,699
24-609	California Housing Finance Agency	8911 Ramsgate	77	Los Angeles	Los Angeles	$10,600,000.00				$10,600,000.00	119	174.055%	0.000%	$0	$878,703
24-607	California Housing Finance Agency	5625 Case	70	Los Angeles	Los Angeles	$10,270,000.00				$10,270,000.00	119	172.193%	0.000%	$0	$851,100
24-604	California Housing Finance Agency	4345 Matilija	75	Los Angeles	Los Angeles	$10,230,000.00				$10,230,000.00	119	153.211%	0.000%	$0	$827,924
24-605	California Housing Finance Agency	3981 Meier	75	Los Angeles	Los Angeles	$10,900,000.00				$10,900,000.00	119	149.902%	0.000%	$0	$871,550
24-606	California Housing Finance Agency	3412 Victoria	58	Los Angeles	Los Angeles	$8,150,000.00				$8,150,000.00	119	147.689%	0.000%	$0	$684,732
24-671	California Municipal Finance Authority	1250 West Jeff	122	Los Angeles	Los Angeles	$47,767,550.00				$47,767,550.00	119	117.357%	0.000%	$0	$4,389,221
24-654	Housing Authority of the City of Los Angeles	Alveare Parkview	105	Los Angeles	Los Angeles	$52,330,000.00				$52,330,000.00	119	108.773%	0.000%	$0	$4,958,397
24-751	Los Angeles Housing Department	Weingart Tower 1B	104	Los Angeles	Los Angeles	$45,163,792.00				$45,163,792.00	119	107.624%	100.000%	$0	$4,158,853
24-684	California Municipal Finance Authority	Twin Park Landing	275	Los Angeles	Los Angeles	$68,000,000.00				$68,000,000.00	109	86.306%	0.000%	$0	$6,395,668
						$311,476,342.00	$0.00	$0.00	$0.00	$311,476,342.00				$0	$28,088,547

BALANCE OF LA COUNTY

ROUND 2 ALLOCATION: $289,524,016
REMAINING: $98,446,462

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-622	California Housing Finance Agency	U.S.VETS-WLAVA Building 300	44	Los Angeles	Los Angeles	$23,305,313.00				$23,305,313.00	120	90.907%	100.000%	$0	$2,218,421
24-624	California Municipal Finance Authority	Maison's Sierra - Phase 2	171	Lancaster	Los Angeles	$25,500,000.00				$25,500,000.00	119	130.582%	0.000%	$0	$2,500,000
24-775	Los Angeles County Development Authority	Cudahy Seniors	140	Cudahy	Los Angeles	$52,300,000.00				$52,300,000.00	119	116.792%	50.000%	$0	$5,090,331
24-750	Los Angeles County Development Authority	Century + Restorative Care Village Phase I	146	Los Angeles	Los Angeles	$53,223,000.00				$53,223,000.00	119	107.875%	51.724%	$0	$4,903,823
24-774	Los Angeles County Development Authority	Casa de la Luz	95	Unincorporated East Los Angeles	Los Angeles	$36,749,241.00				$36,749,241.00	119	93.034%	43.011%	$0	$3,124,556
						$191,077,554.00	$0.00	$0.00	$0.00	$191,077,554.00				$0	$17,837,131

INLAND REGION

ROUND 2 ALLOCATION: $323,875,311
REMAINING: $11,418,657

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-700	California Municipal Finance Authority	Kensington Apartments	126	Murrieta	Riverside	$28,500,000.00				$28,500,000.00	120	110.645%	0.000%	$0	$2,559,831
24-705	California Municipal Finance Authority	Avenue 44 Apartments	180	Indio	Riverside	$39,000,000.00				$39,000,000.00	120	99.850%	0.000%	$0	$3,543,061
24-683	California Municipal Finance Authority	Via Vail Village	236	Rancho Mirage	Riverside	$57,000,000.00				$57,000,000.00	120	96.947%	0.000%	$0	$5,097,847
24-661	California Municipal Finance Authority	Mulberry Gardens Family Apartments	150	Riverside	Riverside	$48,178,510.00				$48,178,510.00	119	113.651%	0.000%	$0	$4,561,791
24-744	California Municipal Finance Authority	Villa Verde	116	Coachella	Riverside	$42,578,583.00				$42,578,583.00	119	105.295%	43.478%	$0	$3,948,871
24-638**	California Municipal Finance Authority	JFM Villas Family Apartments	100	Indio	Riverside	$39,835,945.00				$39,835,945.00	119	87.767%	0.000%	$12,499,192	$3,688,281
24-648	California Municipal Finance Authority	Seventh Street Village	79	Modesto	Stanislaus	$37,517,305.00				$37,517,305.00	119	72.550%	0.000%	$0	$3,484,875
24-639**	California Municipal Finance Authority	JFM Villas Senior Apartments	50	Indio	Riverside	$19,846,311.00				$19,846,311.00	119	65.753%	0.000%	$6,550,729	$1,838,213
						$312,456,654.00	$0.00	$0.00	$0.00	$312,456,654.00				$19,049,921	$28,722,770

NORTHERN REGION

ROUND 2 ALLOCATION: $111,898,714
REMAINING: $9,461,579

APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	2024 BOND CAP	2023 CARRYFORWARD	2022 CARRYFORWARD	2021 CARRYFORWARD	TOTAL ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	STATE CREDIT REQUESTED	FEDERAL CREDIT REQUESTED
24-652	California Municipal Finance Authority	The Crawford	265	Roseville	Placer	$59,000,000.00				$59,000,000.00	120	97.597%	0.000%	$0	$5,664,712
24-727	California Public Finance Authority	Sakura	134	Sacramento	Sacramento	$30,164,000.00				$30,164,000.00	119	108.414%	0.000%	$0	$2,022,553
24-753	California Municipal Finance Authority	Harrington Grove Apartments	52	Folsom	Sacramento	$13,273,135.00				$13,273,135.00	120	84.399%	0.000%	$0	$1,185,006
						$102,437,135.00	$0.00	$0.00	$0.00	$102,437,135.00				$0	$8,872,271

CALIFORNIA DEBT LIMIT ALLOCATION COMMITEE
Final Staff Recommendations*
To be Considered on December 11, 2024
QUALIFIED RESIDENTIAL RENTAL PROJECTS

ADDITIONAL FUNDING

		ROUND 2 ALLOCATION	REMAINING												
SURPLUS		**$348,855,561**	$11,188,086			2024	2023	2022	2021	TOTAL				STATE CREDIT	FEDERAL CREDIT
APPLICATION NUMBER	CDLAC APPLICANT	PROJECT NAME	TOTAL UNITS	CITY	COUNTY	BOND CAP	CARRYFORWARD	CARRYFORWARD	CARRYFORWARD	ALLOCATION	POINTS	TIEBREAKER	HOMELESS %	REQUESTED	REQUESTED
24-664***	California Municipal Finance Authority	Parkside Apartments	64	Lakeport	Lake	$18,285,718.00				$18,285,718.00	120	89.865%	0.000%	$0	$1,727,047
24-623	California Municipal Finance Authority	Dry Creek Commons	58	Healdsburg	Sonoma	$26,627,000.00				$26,627,000.00	120	86.016%	10.526%	$0	$2,375,592
24-644	California Municipal Finance Authority	Saggio Hills Phase I	48	Healdsburg	Sonoma	$19,650,000.00				$19,650,000.00	120	82.944%	0.000%	$0	$1,862,084
24-724	California Municipal Finance Authority	River Grove II	50	Oakhurst	Madera	$19,596,237.00				$19,596,237.00	120	68.845%	26.531%	$0	$1,402,719
24-691	California Municipal Finance Authority	Pacific Crest Commons	55	Truckee	Nevada	$21,000,000.00				$21,000,000.00	120	55.299%	18.519%	$0	$1,942,919
24-675	California Municipal Finance Authority	Mountain Townhomes	25	Mount Shasta	Siskiyou	$9,427,356.00				$9,427,356.00	120	44.277%	12.500%	$3,059,307	$679,923
24-767	City and County of San Francisco	160 Freelon	85	San Francisco	San Francisco	$48,900,000.00				$48,900,000.00	119	136.369%	26.190%	$0	$4,603,977
24-745	California Housing Finance Agency	300 De Haro	425	San Francisco	San Francisco	$101,746,126.00				$101,746,126.00	119	134.510%	0.000%	$0	$6,739,725
24-672	City of San Jose	525 N Capitol	160	San Jose	Santa Clara	$62,535,038.00				$62,535,038.00	119	134.366%	25.316%	$0	$4,592,462
24-596	Housing Authority of the County of Kern	Niles Street Apartments	51	Bakersfield	Kern	$9,900,000.00				$9,900,000.00	119	116.974%	0.000%	$1,300,000	$736,526
						$337,667,475.00	$0.00	$0.00	$0.00	$337,667,475.00				$4,359,307	$26,662,973

	FUNDING SUMMARY
Total Awards	79
Beginning Balance	$2,838,836,381
2024 Bond Cap	$2,752,007,768
2023 Carryforward	$25,940,305
2022 Carryforward	$41,646,451
2021 Carryforward	$956,650
Total Allocation	$2,820,551,174
NC State Credit Available (Includes State Farmworker Credit Balance)	$150,268,660
NC State Credit Awards	$149,159,678
NC State Credit Balance	$1,108,982
4% State Credit Available	$13,722,496
4% State Credit Awards	$2,043,644
4% State Credit Balance	$11,678,852
State Farmworker Credit Available	$25,000,000
State Farmworker Credit Awards	$19,049,921
State Farmworker Credit Balance	$5,950,079

*The information presented here is preliminary and is made available for informational purposes only. The information is not binding on the Committee or its staff. It does not represent any final decision of the Committee and should not be relied upon as such. Interested parties are cautioned that any action taken in reliance on this preliminary information is take at the parties' own risk as the information presented is subject to change at any time until formally adopted by the Committee at a duly noticed meeting.

**Projects awarded Farmworker State Credits.

***Pending staff review.

Application Number	Project Name Address City, State Zip Code County	Applicant/Owner Applicant/Owner Contact(s)	General Partner(s) General Partner(s) Contact(s)	Developer(s) Developer(s) Contact(s)	Seller(s) Signatory of Seller(s)	Bond Issuer	Credit Enhancement Provider	Lender(s) (First Lender is Primary Construction Lender)
CA-24-596	Niles Street Apartments North side of Niles Street between Valencia Drive and Park Drive Bakersfield, CA 93306 Kern County	Housing Authority of the County of Kern Stephen M. Pelz	Golden Empire Affordable Housing, Inc. Stephen M. Pelz Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern	N/A	East West Bank City of Bakersfield: HOME City of Bakersfield: HOME ARP Housing Authority of the County of Kern: RAD
CA-24-597	Pioneer Drive Apartments 3299 Pioneer Drive Bakersfield, CA 93306 Kern County	Pioneer Drive Apartments, LP Stephen M. Pelz	GEAHI Pioneer Apartments, LLC Stephen M. Pelz Kern Housing XVI, LLC Stephen M. Pelz	Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern	N/A	East West Bank County of Kern: HOME County of Kern: HOME - ARP Housing Authority of the County of Kern HCD: NPLH
CA-24-600	Palm Villas at Millennium Gerald Ford Drive between Dinah Shore Drive and Technology Drive Palm Desert, CA 92211 Riverside County	Kingdom Development, Inc. William Leach	PC Gerald Ford Developers, LLC Danavon Horn Kingdom AQ, LLC William Leach	D.L. Horn & Associates, LLC Danavon Horn	City of Palm Desert Todd Hileman	CSCDA	N/A	Citibank Palm Desert Housing Authority County of Riverside: ARPA
CA-24-601	Dakota 3787 North Blackstone Avenue Fresno, CA 93726 Fresno County	Dakota Fresno, LP Sarah Ritten	Housing on Merit XXVI, LLC Jaymie Beckett UP Dakota, LLC Sarah Ritten RHCB Dakota, LLC Leslie Alvarado	UP Holdings California, LLC Sarah Ritten	TOWA, LLC Wayne Rutledge AHBH, LLC Brad Hardie	CMFA	N/A	US Bank City of Fresno: HOME HCD: IIG HCD: AHSC
CA-24-602	Almond Gardens Apartments 707 - 815 Almond Street Suisun City, CA 94585 Solano County	Harbor Park, LLC Camran Nojoomi	Harbor Park, LLC Camran Nojoomi Sudie M. Smith Foundation, Inc. Ruth Forney	Harbor Park, LLC Camran Nojoomi	Susian City Housing Authority Alma Hernandez	CMFA	N/A	Citibank
CA-24-604	4345 Matilija 4345 Matilija Avenue Los Angeles, CA 91423 Los Angeles County	HVN Development, LLC Tommy Beadel	HVN 4345 Matilija, LLC Tommy Beadel Affordable Housing Alliance II, Inc. dba Integrity Housing Anjela Ponce	HVN Development, LLC Tommy Beadel	Proland, LLC Yousef Eshtiaghpour	CalHFA	N/A	KeyBank
CA-24-605	3981 Meier 3981 Meier Street Los Angeles, CA 90066 Los Angeles County	HVN Development, LLC Tommy Beadel	HVN 3981 Meier, LLC Tommy Beadel Integrity Housing Anjela Ponce	HVN Development, LLC Tommy Beadel	Schafer Trust Petra Schafer	CalHFA	N/A	KeyBank
CA-24-606	3412 Victoria 3412 Victoria Avenue Los Angeles, CA 90016 Los Angeles County	3412 Victoria, LP Tommy Beadel	HVN 3412 Victoria, LLC Tommy Beadel Affordable Housing Alliance II, Inc. dba Integrity Housing Anjela Ponce	HVN Development, LLC Tommy Beadel	Adrian H. Lopez & Beverly Suzuki Revocable Trust Adrian Lopez	CalHFA	N/A	KeyBank
CA-24-607	5625 Case 5625 Case Avenue Los Angeles, CA 91601 Los Angeles County	5625 Case, LP Tommy Beadel	HVN 5625 Case, LLC Tommy Beadel Affordable Housing Alliance II, Inc. dba Integrity Housing Anjela Ponce	HVN Development, LLC Tommy Beadel	5625 Case, LLC Michael Maidy	CalHFA	N/A	KeyBank
CA-24-608	5749 Brynhurst 5749 Brynhurst Avenue Los Angeles, CA 90043 Los Angeles County	5749 Brynhurst, LP Tommy Beadel	HVN 5749 Brynhurst, LLC Tommy Beadel Affordable Housing Alliance II, Inc. dba Integrity Housing Anjela Ponce	HVN Development, LLC Tommy Beadel	Roston Thomas	CalHFA	N/A	KeyBank
CA-24-609	8911 Ramsgate 8911 Ramsgate Avenue Los Angeles, CA 90045 Los Angeles County	HVN Development, LLC Tommy Beadel	HVN 8911 Ramsgate, LLC Tommy Beadel Affordable Housing Alliance II, Inc. dba Integrity Housing Anjela Ponce	HVN Development, LLC Tommy Beadel	8911 Ramsgate, LLC Scott Walter	CalHFA	N/A	KeyBank
CA-24-615	Monarch Hillside Affordable Apartments 4850 Market Street San Diego, CA 92102 San Diego County	Monarch Hillside Affordable Partners, LP Erik Schraner	Monarch Hillside GP, LLC Alan Bogomilsky AOFP LA MGP, LLC Ajay Nayar	Monarch Group Erik Schraner Klein Financial Corp Alan Bogomilsky	Monarch Hillside Apartments, LP Robert N. Klein Rodney F. Stone Sarah Kruer Jager	CalHFA	N/A	Walker & Dunlop
CA-24-617	Pleasant View Apartments 3555 North Pleasant Avenue Fresno, CA 93705 Fresno County	Pleasant View 2024, LP Derek M. Skrzynski	AOF Cameron Villa, LLC Ajay Nayar American Community Developers, Inc. Derek M. Skrzynski	American Community Developers, Inc. Derek M. Skrzynski	LINC-Pleasant View Apartments Housing Investors, LP Rebecca F. Clark	CMFA	N/A	The Sturges Company HUD: Green & Resilient Retrofit Berkadia: HUD 221(d)4
CA-24-622	U.S.VETS-WLAVA Building 300 11410 Patton Avenue Los Angeles, CA 90049 Los Angeles County	U.S.VETS-WLAVA Building 300, LLC Lori Allgood	U.S.VETS - WLAVA Building 300, LLC Lori Allgood Kingdom WLAVA Building 300, LLC William Leach	U.S.VETS Housing Corporation Lori Allgood	West LA Veterans Collective LLC Brian D'Andrea	CalHFA	N/A	Citibank The Home Depot Foundation HUD Community Project Funding Grant HCD VHHP VA
CA-24-623	Dry Creek Commons 155 Dry Creek Road Healdsburg, CA 95448 Sonoma County	Burbank Housing Development Corporation Jocelyn Lin	BHDC Dry Creek Commons, LLC Lawrance Florin	Burbank Housing Development Corporation Jocelyn Lin	City of Healdsburg Jeff Kay	CMFA	N/A	Silicon Valley Bank Sonoma County: HOME Sonoma County: CDBG HCD: Joe Serna City of Healdsburg HCD CDBG-DR
CA-24-624	Maison's Sierra - Phase 2 West Avenue H-2 and Schamise Street Lancaster, CA 93534 Los Angeles County	Maison's Sierra Phase 2, LP Phil Ram	Ravello MODs Sierra Phase 2, LLC Phil Ram AHA High Desert II MGP, LLC Hilda Jusuf	Ravello Holdings, Inc. Phil Ram	Lancaster Housing Authority Jason Caudle	CMFA	N/A	Merchants Capital

Application Number	Project Name Address City, State Zip Code County	Applicant/Owner Applicant/Owner Contact(s)	General Partner(s) General Partner(s) Contact(s)	Developer(s) Developer(s) Contact(s)	Seller(s) Signatory of Seller(s)	Bond Issuer	Credit Enhancement Provider	Lender(s) (First Lender is Primary Construction Lender)
CA-24-627	Paseo Senter I Rehab 1898 Senter Road San Jose, CA 95112 Santa Clara County	PSI Rehab, LP Chris Neale	Core PSI Rehab, LLC Chris Neale AOF Paseo Senter, LLC Ajay Nayar	Core Affordable Housing, LLC Christopher Neale	Paseo Senter, LP Chris Neale Ajay Nayar	CMFA	RBC Capital	Silicon Valley Bank HCD - MHP City of San Jose County of Santa Clara Opportunity Fund Fannie Mae
CA-24-628	Downtown Library Mixed Use Project 119 Lincoln Street Santa Cruz, CA 95060 Santa Cruz County	DTLMU Investors, LP Andrea Osgood	Eden DTLMU, LLC Andrea Osgood FTF DTLMU, LLC Jim Rendler	For the Future Housing, Inc. Jim Rendler	City of Santa Cruz Bonnie Lipscomb	CMFA	N/A	Chase Bank City of Santa Cruz: AHTF City of Santa Cruz: LHTF City of Santa Cruz: CHDO HOME HCD: AHSC
CA-24-630	Montecito Village 1464 Montecito Road Ramona, CA 92065 San Diego County	Ramona Preservation, LP Chase Olson	Ramona Preservation GP, LLC Chase Olson Las Palmas Housing & Development Corporation Noami Pines	SP Tax Credit Developer II, LLC Chase Olson	Montecito Village Affordable, LP Steve TeSelle	CMFA	Fannie Mae	Lument
CA-24-633	Arvin RAD 508 Stockton Avenue Arvin, CA 93203 Kern County 901 McElroy Street Arvin, CA 93203 Kern County 933 Wernli Court Arvin, CA 93203 Kern County	Housing Authority of the County of Kern Stephen M. Pelz	Golden Empire Affordable Housing Inc. Stephen M. Pelz Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern Stephen M. Pelz	Housing Authority of the County of Kern	N/A	East West Bank
CA-24-638	JFM Villas Family Apartments 47155 Van Buren Street Indio, CA 92201 Riverside County	The Coachella Valley Housing Coalition Mary Ann Ybarra	JFM Villas Family, LLC Mary Ann Ybarra	Coachella Valley Housing Coalition Mary Ann Ybarra	The Coachella Valley Housing Coalition Pedro. S. G. Rodriguez	CMFA	N/A	Bank of America HCD: FWHG HCD: MHP
CA-24-639	JFM Villas Senior Apartments 47135 Van Buren Street Indio, CA 92201 Riverside County	The Coachella Valley Housing Coalition Mary Ann Ybarra	JFM Villas, LLC Pedro S.G. Rodriguez	Coachella Valley Housing Coalition Mary Ann Ybarra	The Coachella Valley Housing Coalition Pedro S.G. Rodriguez	CMFA	N/A	Bank of America HCD: FWHG HCD: MHP
CA-24-644	Saggio Hills Phase I Precise location in the form of coordin Healdsburg, CA 95448 Sonoma County	Saggio Hills Lot 14, LP Robin Zimbler	Freebird Saggio Hills Lot 14, LLC Robin Zimbler JHC-Saggio Hills Lot 14, LLC Michael Massie	Freebird Development Company, LLC Robin Zimbler Jamboree Housing Corporation Robin Zimbler	City of Healdsburg Jeff Kay	CMFA	N/A	Citibank City of Healdsburg HCD: AHSC
CA-24-647	The Grant at Mission Trails 5945 Mission Gorge Road San Diego, CA 92120 San Diego County	The Grant at Mission Trails, LP Paul Salib	PSCDC The Grant, LLC Robert Laing The Grant at Mission Trails AGP, LLC Paul Salib	CRP Affordable Housing & Community Development, LLC Paul Salib	5945 Mission Gorge LLC Paul Salib	CalHFA	N/A	Citibank San Diego Housing Commission City of San Diego: CDBG County of San Diego: ARPA
CA-24-648	Seventh Street Village Northwest corner of 7th and J Streets Modesto, CA 95354 Stanislaus County	Visionary Home Builders of California, Inc. Carol J. Ornelas	VHB Seventh Street Village, LLC Carol J. Ornelas	Visionary Home Builders of California, Inc. Carol J. Ornelas	Vintage Properties, LP Brian D. Dole Caffeine Ventures, LLC Brian D. Dole Casa Del Sol Ventures, LLC Brian D. Dole	CMFA	N/A	Banner Bank City of Modesto: HOME City of Modesto: PLHA City of Modesto: CDBG HCD: AHSC HCD: AHSC HRI RAZA Development Fund
CA-24-649	Civic Crossing 699 Ygnacio Valley Road Walnut Creek, CA 94596 Contra Costa County	YVR, LP Norma Guzman	RCD GP, LLC Norma Guzman	Resources for Community Development Norma Guzman	699 Ygnacio, LLC Mark D.Hall	CMFA	N/A	Chase Bank City of Walnut Creek County of Contra Costa HCD: AHSC HRI HCD: AHSC AHD HCD: NPLH
CA-24-652	The Crawford 1130 Harvey Way Roseville, CA 95747 Placer County	Roseville Harvey 715, LP Darren Bobrowsky	USA Roseville Harvey 715, LP Darren Bobrowsky Riverside Charitable Corporation Recinda Kay Shafer	USA Multi-Family Development, Inc. Darren Bobrowsky	West Roseville Development Company James C. Ghielmetti	CMFA	N/A	Citibank
CA-24-653	850 Turk Street 850 Turk Street San Francisco, CA 94102 San Francisco County	MidPen Housing Corporation Joanna Carman	MP Turk Street, LLC Joanna Carman	MidPen Housing Corporation Joanna Carman	State of California Jason Kenney	San Francisco MOHCD	N/A	Wells Fargo SF Mayor's Office of Housing Loan HCD: IIG HCD: LGMG California Community Reinvestment Corporation HCD: AHSC
CA-24-654	Alveare Parkview The property is bound by S. Hill Street to the west, west 14th street to the north and Broadway to the East. Los Angeles, CA 90015 Los Angeles County	Alveare Parkview Housing Partners, LP Frank Cardone	Alveare Parkview Development Co., LLC Frank Cardone La Cienega LOMOD, Inc. Tina Smith- Booth Weingart Alveare Parkview, LLC Kevin Murray	Irvine Development Company, LLC Frank Cardone	State of California Jim Martone	HACLA	N/A	U.S. Bank City of Los Angeles - ULA HCD - Local Government Matching Grant HCD - IIG HCD - AHSC

Conflict Summary
December 11, 2024 CTCAC Committee Meeting

Application Number	Project Name Address City, State Zip Code County	Applicant/Owner Applicant/Owner Contact(s)	General Partner(s) General Partner(s) Contact(s)	Developer(s) Developer(s) Contact(s)	Seller(s) Signatory of Seller(s)	Bond Issuer	Credit Enhancement Provider	Lender(s) (First Lender is Primary Construction Lender)
CA-24-661	Mulberry Gardens Family Apartments 2560 Mulberry Street Riverside, CA 92501 Riverside County	Eden Housing, Inc. Aruna Doddapaneni	Mulberry Gardens Family, LLC Aruna Doddapaneni	Eden Housing, Inc. Jared Kadry	State of California Madelynn McClain	CMFA	N/A	Chase Bank HCD: LGMG HCD: IIG City of Riverside: HOME County of Riverside: HOME California Energy Comission: BUILD HCD: AHSC
CA-24-664	Parkside Apartments 1310 Craig Avenue Lakeport, CA 95453 Lake County	Valley Initative for Affordable Housing Emily Haden	Johnson & Johnson Investments, LLC Chris Dart WSA Partners I, LLC Peter Schellinger Valley Initiative for Affordable Housing Emily Haden	Danco Communities Chris Dart	SBRI 1400 Burbank, LLC Bill Schellinger Frank Schellinger	CMFA	N/A	Citibank HCD: CDBG DR HCD: IIG HCD: PLHA
CA-24-666	Brandon Place Apartments 3941 Polk Street Riverside, CA 92505 Riverside County	Brandon Place, LP Robert Lee	Spira Brandon Place, LP Robert Lee FFAH II BP Senior Apartments, LLC Tarun Chandran	Spira BP Development, LP Robert Lee	FFAH Brandon Place Senior, LLC Tarun Chandran	CSCDA	N/A	Freddie Mac CSCDA
CA-24-667	Wakeland Riverwalk 1150 Fashion Valley Road San Diego, CA 92108 San Diego County	Wakeland Housing and Development Corporation Lisa Huff	Wakeland Riverwalk Family, LLC Lisa Huff SDR Affordable 1, LLC Pete Shearer	Wakeland Housing and Development Corporation Lisa Huff	SD Riverwalk, LLC Eric Hepfer	CalHFA	N/A	Banner Bank HCD: AHSC HRI HCD: AHSC AHD
CA-24-670	Balboa Reservoir - Building E Parking Lot directly north of 351 Brighton Avenue. CCSF Lower Reservoir Parking Lot. San Francisco, CA 94112 San Francisco County	Balboa Lee Avenue, LP Smitha Seshadri	Balboa Lee Avenue, LLC Smitha Seshadri	BRIDGE Housing Corporation Smitha Seshadri	BHC Balboa Builders, LLC Smitha Seshadri	City and County of San Francisco	N/A	Citibank MOHCD Gap Financing Perm Loan HCD: AHSC AHD HCD: AHSC STI
CA-24-671	1250 West Jeff 1250 West Jefferson Boulevard Los Angeles, CA 90007 Los Angeles County	South Catalina Street I, LP Joseph Seager	Central Valley Coalition for Affordable Housing Christina Alley West Jefferson Investment, LLC Joseph Seager	Community Builders Group Joseph Seager	CBG University Gradens, LP Joseph P. Seager	CMFA	N/A	Rose Community Capital LLC Sterling Bank
CA-24-672	525 N Capitol 525 North Capitol Avenue San Jose, CA 95133 Santa Clara County	525 Capitol, LP Angela Heyward	525 Capitol CDP, LLC Angela Heyward FFAH V 525 Capitol, LLC Mei Luu	Community Development Partners Angela Heyward	525 Capitol CDP, LLC Kyle Paine	City of San Jose	N/A	Citibank Apple - Silicon Valley Affordable Housing Trust City of San Jose Santa Clara County: Measure A HCD: IIG
CA-24-673	Meridian at Corona Station 890 North McDowell Boulevard Petaluma, CA 94954 Sonoma County	Community Revitalization and Development Corporation David Rutledge	Johnson & Johnson Investments Chris Dart Community Revitalization and Development Corporation David Rutledge Danco Communities Chris Dart	Danco Communities Chris Dart	Lomas - Corona Station, LLC Todd Kurtin	CMFA	N/A	Citibank City of Petaluma HCD: AHSC
CA-24-675	Mountain Townhomes 735 Chestnut Street Mount Shasta, CA 96067 Siskiyou County	Community Revitalization and Development Corporation David Rutledge	Mount Shasta Chestnut Street, LLC Chris Dart Community Revitalization and Development Corporation David Rutledge	Danco Communities Chris Dart	Billy Charles Weldon and Ruth Jeanette Weldon	CMFA	N/A	Citibank HCD: IIG HCD: PLHA Siskiyou County HHSA: PLHA
CA-24-679	Oaks on Balboa 5435 - 5445 Balboa Boulevard Los Angeles, CA 91316 Los Angeles County	5435 Balboa, LP Brian Mikail	Las Palmas Housing and Development Corporation Noami Pines Elysian Balboa, LLC Brian Mikail	Las Palmas Housing and Development Corporation Noami Pines	5435 Balboa, LLC David Lee Thousand Gold Balboa, LLC In Young Kim	CMFA	N/A	Citibank
CA-24-680	712 Seagaze 712 Seagaze Drive Oceanside, CA 92054 San Diego County	716 Seagaze Affordable, LP Marc Welk	PSCDC Prime SD, LLC Robert Laing 716 Seagaze, LLC Marc Welk	Elsey Holdings, LLC Bryan Elsey	716 Seagaze, LLC Bryan Elsey	CMFA	N/A	Citibank HCD: AHSC AHD
CA-24-681	Walnut Apartments 3020 Fostoria Way Danville, CA 94526 Contra Costa County	Danville Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	TH Danville Camino Ramon, LLC Tony Bosowski	CMFA	N/A	California Bank & Trust Bonneville
CA-24-683	Via Vail Village South of Dinah Shore Drive, west of Monterey Avenue Rancho Mirage, CA 92270 Riverside County	Rancho Mirage Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	Rancho Mirage Housing Authority Isaiah Hagerman	CMFA	N/A	Citibank Bonneville Rancho Mirage Housing Authority City of Rancho Mirage CVAG
CA-24-684	Twin Park Landing 6670 Reseda Boulevard Los Angeles, CA 91335 Los Angeles County	Los Angeles Reseda Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	Park Reseda Mortgage, LLC Stephen Plutsky	CMFA	N/A	Citibank Bonneville
CA-24-686	Sunnydale HOPE SF Block 9 1652 Sunnydale Avenue San Francisco, CA 94134 San Francisco County	Sunnydale Block 9 Housing Partners, LP Ann Silverberg	Related/Sunnydale Block 9 Development Co., LLC Ann Silverberg Sunnydale Block 9, LLC Ramie Dare	Related Irvine Development Company Ann Silverberg	Housing Authority of the City and County of San Francisco Barbara T. Smith	City and County of San Francisco	N/A	Citibank SF MOHCD Loan

Application Number	Project Name Address City, State Zip Code County	Applicant/Owner Applicant/Owner Contact(s)	General Partner(s) General Partner(s) Contact(s)	Developer(s) Developer(s) Contact(s)	Seller(s) Signatory of Seller(s)	Bond Issuer	Credit Enhancement Provider	Lender(s) (First Lender is Primary Construction Lender)
CA-24-690	Rovina Lane Apartments 2 Rovina Lane Petaluma, CA 94952 Sonoma County	Petaluma Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	Pacific West Communities, Inc. Caleb Roope	CMFA	N/A	California Bank & Trust Bonneville
CA-24-691	Pacific Crest Commons 10077 State Highway 89 South Truckee, CA 96161 Nevada County	Truckee Pacific Crest Associates, LP Caleb Roope	Building Better Partnerships, Inc. Gustavo Becerra TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	State of California Madelynn McClain	CMFA	N/A	California Bank & Trust HCD: IIG Loan Town of Truckee Regional Housing Authority HCD: LGMG HCD: NPLH
CA-24-700	Kensington Apartments Washington Avenue and Magnolia Street Murrieta, CA 92562 Riverside County	Murrieta Pacific Associates Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	Pacific West Communities, Inc. Caleb Roope	CMFA	N/A	Citibank Bonneville County of Riverside City of Murrieta WRCOG
CA-24-703	Broadway Meadows 1301 Broadway Millbrae, CA 94030 San Mateo County	Millbrae Broadway Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	AHLC, LLC Alexis Gevorgian	CMFA	N/A	Citibank Bonneville
CA-24-705	Avenue 44 Apartments Northeast corner of Avenue 44 and Golf Center Parkway Indio, CA 92203 Riverside County	Indio Avenue 44 Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	Pacific West Communities, Inc. Caleb Roope	CMFA	N/A	Citibank Bonneville County of Riverside: PLHA City of Indio: LMIHAF Loan City of Indio - Fee Deferral Loan
CA-24-706	Alvarado Creek Apartments 5901-5913, 5915 & 5927 Mission Gorge Road San Diego, CA 92120 San Diego County	San Diego Pacific Associates, LP Caleb Roope	Central Valley Coalition for Affordable Housing Christina Alley TPC Holdings IX, LLC Caleb Roope	Pacific West Communities, Inc. Caleb Roope	Pacific West Communities, Inc. Caleb Roope	CMFA	N/A	Citibank Bonneville HCD - IIG
CA-24-716	Livingston B Street Winton Parkway and B Street Livingston, CA 95334 Merced County	Self-Help Enterprises Betsy McGovern-Garcia	SHE Livingston B Street, LLC Betsy McGovern-Garcia	Self-Help Enterprises Betsy McGovern-Garcia	Livingston Community Health Leslie Abasta-Cumming	CMFA	N/A	US Bank City of Livingston - PHLA HCD - HOME ARP, AHSC
CA-24-719	Sunnydale HOPE SF Block 7 Located in the Sunnydale HOPE SF Special Use District, Sunnydale Block 7 San Francisco, CA 94134 San Francisco County	Sunnydale Block 7 Housing Partners, LP Elizabeth Kuwada	Sunnydale Block 7, LLC Elizabeth Kuwada Sunnydale Block 7 Development Company, LLC Ann Silverberg	Mercy Housing California Emily Estes	Housing Authority of the City and County of San Fransico Barbara T. Smith	City and County of San Francisco	N/A	Citibank HCD - AHSC MOHCD
CA-24-724	River Grove II 49177 Road 426 Oakhurst, CA 93644 Madera County	River Grove II, LP Betsy McGovern-Garcia	River Grove II, LLC Betsy McGovern-Garcia	Self-Help Enterprises Betsy McGovern-Garcia	Schneider Family Trust Nancy A. Schneider Steven Allison Tally Allison	CMFA	N/A	US Bank HCD - IIG, NHTF, HOME ARP
CA-24-726	Arrowhead Grove Phase IV Elm Circle W and N Alder Street San Bernardino, CA 92410 San Bernardino County	National Community Renaissance of California Lesley Hampton	NCRC AG4 MGP, LLC Lesley Hampton	National Community Renaissance of California Lesley Hampton	Housing Authority of the County of San Bernadino Rishad Mitha	California Statewide Communities Development Authority	N/A	Bank of America San Bernardino County - HOME City of San Bernardino - HOME, LMIHAF HACSB HCD - AHSC
CA-24-727	Sakura 2000 16th Street Sacramento, CA 95818 Sacramento County	2000 16th St Associates, LP Parker Evans	2000 16th St Mutual Housing Association, LLC Roberto Jimenez 2000 16th St CACDC Association, LLC Todd Leon	Mutual Housing California Parker Evans	Capitol Area Development Authority Danielle Foster	CalPFA	N/A	Banner Bank Capitiol Area Development Authority HCD - AHSC
CA-24-731	North Fair Oaks Apartments 430-434 Douglas Avenue 429-431 Macarthur Avenue Redwood City, CA 94063 San Mateo County	Compass for Affordable Housing Robin Martinez	CFAH Housing, LLC Robin Martinez AHG North Fair Oaks, LLC James Silverwood	Affirmed Housing Group, Inc. Rob Wilkins	Guy Philip Montoro 2013 Trust Guy Philip Montoro	CMFA	Lument Real Estate Capital LLC	Silicon Valley Bank San Mateo County - Measure K, HHC, MHSA Lument Securities, LLC Lument Real Estate Capital, LLC
CA-24-732	Veteran Commons 11269 Garfield Avenue Downey, CA 90242 Los Angeles County	Veteran Commons, LP Lara Regus	Veteran Commons MGP, LLC Lara Regus Veteran Commons CGP, LLC Anthony Bahamondes	Abode Communities Lara Regus	Los Angeles County Development Authority Emilio Salas	Los Angeles County Development Auhority	N/A	Citibank LACDA - AHTF HCD - IIG LISC - NEF HCD - VHHP Gateway Cities Affordable Housing Trust
CA-24-735	Victory Boulevard 17100 Victory Boulevard Los Angeles, CA 91316 Los Angeles County	Linc Housing Corporation Anders Plett	Linc Victory Blvd, LLC Anders Plett Victory Boulevard Apartments, LLC Tina Booth	Linc Housing Corporation Anders Plett	Remett, LLC Richard F. Moss	HACLA	N/A	Citibank HACLA
CA-24-736	Distel Circle 330 Distel Circle Los Altos, CA 94022 Santa Clara County	330 Distel Circle, LP Welton Jordan	330 Distel Circle EAH, LLC Welton Jordan	EAH Inc. Bronson Viscarra	County of Santa Clara Consuelo Hernandez	CMFA	N/A	Wells Fargo CCRC County of Santa Clara AHP
CA-24-737	Larkin Pine Senior Housing 1303 Larkin Street San Francisco, CA 94109 San Francisco County	Chinatown Community Development Center, Inc. Sharon Christen	Chinatown Community Development Center, Inc. Sharon Christen	Chinatown Community Development Center, Inc. Sharon Christen	Larkin Pine, LP Malcolm Yeung	City and County of San Francisco	N/A	Chase HCD - RHCP MOHCD

Conflict Summary
December 11, 2024 CTCAC Committee Meeting

Application Number	Project Name Address City, State Zip Code County	Applicant/Owner Applicant/Owner Contact(s)	General Partner(s) General Partner(s) Contact(s)	Developer(s) Developer(s) Contact(s)	Seller(s) Signatory of Seller(s)	Bond Issuer	Credit Enhancement Provider	Lender(s) (First Lender is Primary Construction Lender)
CA-24-738	Kooser Apartments 1371 Kooser Road San Jose, CA 95118 Santa Clara County	Compass for Affordable Housing Robin Martinez	AHG Kooser, LLC James P. Silverwood CFAH Housing, LLC Robin Martinez	Affirmed Housing Group Jose J. Lujano	Thao Bui & Mai Tuyet Thai, Bui Family Living Trust Thao Bui	City of San Jose	Lument Real Estate Capital LLC	Banner Bank County of Santa Clara City of San Jose Lument Securities LLC Lument Real Estate Capital LLC County of Santa Clara City of San Jose
CA-24-740	Westside Village 850 Almar Avenue Santa Cruz, CA 95060 Santa Cruz County	CRP Westside Village, LP Paul Salib	PSCDC Westside, LLC Robert Laing CRP Westside Village AGP, LLC Paul Salib	CRP Affordable Housing & Community Development, LLC Paul Salib	Louis Emmit Rittenhouse Monica Melrose	CalHFA	N/A	Citibank
CA-24-744	Villa Verde 84824 Calle Verde Coachella, CA 92236 Riverside County	Abode Communities Lara Regus	Villa Verde I GP, LLC Lara Regus	Abode Communities Lara Regus	Housing Authority of Riverside County Heidi Marshall	CMFA	N/A	Wells Fargo LIIF HACR CCRC HCD - NPLH
CA-24-745	300 De Haro 300 De Haro Street San Francisco, CA 94103 San Francisco County	De Haro MRK, LLC Sydne Garchik	300 De Haro Holdings, LLC Sydne Garchik Pacific Southwest Community Development Corporation Robert Laing	MRK Partners, Inc. Sydne Garchik	Four G Enterprises, LLC Gail Goldyne	CalHFA	N/A	Citibank MRK Partners Inc.
CA-24-746	Avanzando San Ysidro 125 Cypress, 210-240 South Vista, 317 Cottonwood San Diego, CA 92173 San Diego County	Avanzando San Ysidro, LP Georgette Gomez	Avanzando San Ysidro, LLC Georgette Gomez Hitzke Development Corporation Ginger Hitzke	Hitzke Development Corporation Ginger Hitzke	Casa Familiar, Inc. Lisa Cuestas	CalHFA	N/A	Citibank, PNC Casa Familiar, Inc. HCD - AHSC San Diego Housing Commission
CA-24-750	Century + Restorative Care Village Phase I 1321 North Mission Road Los Angeles, CA 90033 Los Angeles County	Century Affordable Development, Inc. Oscar Alvarado	Century Affordable Development, Inc. Oscar Alvarado	Century Affordable Development, Inc. Oscar Alvarado	The County of Los Angeles Emilio Salas	Los Angeles County Development Auhority	N/A	Wells Fargo CCRC LACDA HCD - AHSC
CA-24-751	Weingart Tower 1B 554-562 South San Pedro Street Los Angeles, CA 90013 Los Angeles County	Weingart Tower 1B, LP Ben Rosen	WC Towers 1B, LLC Ben Rosen 554 S. San Pedro Development Company, LLC Christopher Johnson	Weingart Center Association Ben Rosen	Weingart Center Association Kevin Murray	Los Angeles Housing Department	N/A	U.S. Bank HCD - MHP LAHD - HHH LACDA - NPLH
CA-24-753	Harrington Grove Apartments 791 Harrington Way Folsom, CA 95630 Sacramento County	West Development Ventures, LLC Mike Kelley	West Development Ventures, LLC Mike Kelley Central Valley Coalition for Affordable Housing Christina Alley Pacific West Communities, Inc. Caleb Roope	West Development Ventures, LLC Mike Kelley	KFP Folsom, LLC Christopher J. Coulter	CMFA	N/A	Citibank, Bonneville Multifamily Capital City of Folsom Boston Financial
CA-24-754	Oak View Ranch Senior Apartments 24960 Adams Avenue Murrieta, CA 92562 Riverside County	National Community Renaissance of California Lesley Hampton	NCRC Murrieta Senior MGP, LLC Lesley Hampton	National Community Renaissance of California Lesley Hampton	The Murrieta Housing Authority Kim Summers	California Statewide Communities	N/A	Bank of America Murrieta Housing Authority County of Riverside NCRC
CA-24-756	Viscar Terrace Apartments 40475 Vista Murriet, 40600 Myers Lane Murrieta, CA 92562 Riverside County	Viscar Terrace, LP Tung Tran	Viscar Terrace, LLC Tung Tran Rio Hondo Community Development Corpoation Kenneth Ferreira	Etapes Corporation Tung Tran	John Erickson Michelle Erickson	CMFA	N/A	Citibank U.S. Bank
CA-24-757	Tampico Motel Conversion 120 South State College Boulevard, 2016 East Center Street Anaheim, CA 92806 Orange County	Center Housing Partners, LP Victoria Rodriguez	JHC-Center, LLC Victoria Rodriguez	Jamboree Housing Corporation Victoria Rodriguez	Anaheim Housing Authority Grace Ruiz-Stepter	Anaheim Housing Authority	N/A	Banner Bank Orangewood Foundation Anaheim Housing Authority
CA-24-759	Locke Lofts 345 North Madison Avenue Los Angeles, CA 90004 Los Angeles County	Locke Lofts Associates, LP Caleb Roope	TPC Holdings IX, LLC Caleb Roope Flexible PSH Solutions, Inc. Dalila Sotelo	Pacific West Communities, Inc. Caleb Roope	Locke Lofts Associates, LP Caleb Roope	Los Angeles Housing Department	N/A	California Bank & Trust Bonneville Multifamily Capital Boston Financial LAHD - AHMP HCD - AHSC
CA-24-767	160 Freelon 160 Freelon Street San Francisco, CA 94107 San Francisco County	160 Freelon Housing Partners, LP Ann Silverberg	160 Freelon Development Company, LLC Ann Silverberg SFHDC 160 Freelon, LLC David J. Sobel	Irvine Development Company Ann Silverberg	City and County of San Francisco Andrew Penick Eric D. Shaw	City and County of San Francisco	N/A	Citibank HCD - AHSC AHD MOHCD
CA-24-768	Moreland Apartments 4375 Payne Avenue San Jose, CA 95117 Santa Clara County	Reliant - Moreland, LP Mike April	Gung Ho - Moreland, LLC Mike April Rainbow - Moreland, LLC Flyann Janisse	Gung Ho - Moreland, LLC Mike April	Moreland Apartments Associates, LP Pietro Brezzo	CMFA	N/A	Citibank

Application Number	Project Name Address City, State Zip Code County	Applicant/Owner Applicant/Owner Contact(s)	General Partner(s) General Partner(s) Contact(s)	Developer(s) Developer(s) Contact(s)	Seller(s) Signatory of Seller(s)	Bond Issuer	Credit Enhancement Provider	Lender(s) (First Lender is Primary Construction Lender)
CA-24-771	4575 Scotts Valley Apartments 4575 Scotts Valley Drive Scotts Valley, CA 95066 Santa Cruz County	4575 Scotts Valley Apartments, LP Paul Salib	PSCDC Scotts, LLC Robert Laing CRP 4575 Scotts Valley Apartments AGP, LLC Paul Salib Tim Gordin	CRP Affordable Housing & Community Development, LLC Paul Salib	Appenrodt Living Trust, Richard A. Fontana 2006 Irrevocable Trust, Griffen Family Trust, Parker Family Trust Joseph W. & Kathleen W. Appenrodt, Ryan Fontana, Charles & Meridth Griffen, Randall & Laura C. Parker	CalHFA	N/A	Citibank
CA-24-774	Casa de la Luz 744-754 South Kern Avenue Unincorporated East Los Angeles, CA 90022 Los Angeles County	Casa de la Luz, LP Sarah Letts	HCHC Casa de la Luz GP, LLC Sarah Letts	Hollywood Community Housing Corporation Sarah Letts	Tana Ung Wong Trust Tana U Wong	Los Angeles County Development Auhority	N/A	Citibank HCD - AHSC LACDA
CA-24-775	Cudahy Seniors 4610 Santa Ana Street Cudahy, CA 90201 Los Angeles County	Cudahy Senior Apartments, LP Kevin Chin	NCRC CS GP, LLC Kevin Chin PRIMA CS GP, LLC Fernando Vasquez	National Community Renaissance of California Kevin Chin	Prima Development Fernando Vasquez	Los Angeles County Development Auhority	N/A	Citibank Bank of America LACDA Citizens Business Bank LA County 4th District Community Program Fund HCD - IIG City of Cudahy
CA-24-785	San Joaquin Senior, San Joaquin Apartments and California Apartments 21900, 22150 and 22200 West California Avenue San Joaquin, CA 93660 Fresno County	SJ3 Investment Group, LP Edward Mackay	Edward Mackay Enterprises, LLC Edward Mackay The Beneficial Housing Foundation Kimberley McClintock	Community Preservation Partners Karen Buckland	San Joaquin Enterprises, San Joaquin Enterprises II & San Joaquin Enterprises III Dorian Mackay Hermann John P. Casper	CMFA	Bonneville Mortgage Company	Bonneville Mortage Company USDA RD 515 Assumption
CA-24-787	Lake Isabella Senior Apartments I & I 2701 Eskine Creek Road Lake Isabella, CA 93240 Kern County	Lake Isabella Investment Group, LP Edward Mackay	Edward Mackay Enterprises, LLC Edward Mackay The Beneficial Housing Foundation Kimberley McClintock	Community Preservation Partners Karen Buckland	Lake Isabella Enterprises & Lake Isabella Enterprises II Dorian Mackay Hermann John P. Casper	CMFA	Bonneville Mortgage Company	Bonneville Mortage Company USDA RD 515 Assumption

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Niles Street Apartments, located at Niles Street between Valencia Drive and Park Drive in Bakersfield on a 3.16 acre site, requested and is being recommended for a reservation of $736,526 in annual federal tax credits and $1,300,000 in total state tax credits and $9,900,000 of tax-exempt bond cap to finance the new construction of 51 units of housing, consisting of 50 restricted rental units and 1 unrestricted manager's unit. The project will have 50 one-bedroom units, and 1 three-bedroom unit, serving special needs tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Housing Authority of the County of Kern and will be located in Senate District 16 and Assembly District 35.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number CA-24-596

Project Name Niles Street Apartments

Site Address:	Niles Street between Valencia Drive and Park Drive Bakersfield, CA 93306
County:	Kern
Census Tract:	9.07

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$736,526	$1,300,000
Recommended:	$736,526	$1,300,000

* The applicant made an election not to sell (Certificate) any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended: $9,900,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Housing Authority of the County of Kern
Contact:	Stephen M. Pelz
Address:	601 24th Street Bakersfield, CA 93301
Phone:	661-631-8500
Email:	spelz@kernha.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Housing Authority of the County of Kern
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	East West Bank

Development Team

General Partner(s) or Principal Owner(s):	Golden Empire Affordable Housing, Inc. Housing Authority of the County of Kern
General Partner Type:	Nonprofit
Parent Company(ies):	Golden Empire Affordable Housing, Inc. Housing Authority of the County of Kern
Developer:	Housing Authority of the County of Kern
Investor/Consultant:	PNC
Management Agent:	Housing Authority of the County of Kern

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	51	
No. / % of Low Income Units:	50	100.00%
Average Targeted Affordability:	34.75%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME / HOME-ARP (American Rescue Plan) / HUD RAD (Rental Assistance Demonstration) / HUD Section 8 Project-based Vouchers (50 Units - 100%)	

Information

Housing Type:	Special Needs
Geographic Area:	Central Valley Region
State Ceiling Pool:	Surplus
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	25	50%
40% AMI:	5	10%
50% AMI:	10	20%
60% AMI:	10	20%

Unit Mix

50	1-Bedroom Units
1	3-Bedroom Units
51	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
25	1 Bedroom	30%	$438
5	1 Bedroom	40%	$619
10	1 Bedroom	50%	$731
10	1 Bedroom	60%	$731

1	3 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application

Land and Acquisition	$435,597
Construction Costs	$12,980,000
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$649,000
Soft Cost Contingency	$100,000
Relocation	$60,000
Architectural/Engineering	$625,000
Const. Interest, Perm. Financing	$992,000
Legal Fees	$205,000
Reserves	$124,000
Other Costs	$995,291
Developer Fee	$2,401,714
Commercial Costs	$0
Total	**$19,567,602**

Residential

Construction Cost Per Square Foot:	$354
Per Unit Cost:	$383,678
Estimated Hard Per Unit Cost:	$222,815
True Cash Per Unit Cost*:	$362,253
Bond Allocation Per Unit:	$194,118
Bond Allocation Per Restricted Rental Unit:	$198,000

Construction Financing

Source	Amount
East West Bank: Tax-Exempt	$9,900,000
East West Bank: Taxable	$1,200,000
County of Kern: HOME	$2,324,446
HACK[1]: RAD	$2,000,000
Deferred Costs	$2,318,039
Tax Credit Equity	$1,825,117

Permanent Financing

Source	Amount
East West Bank: Tax-Exempt	$2,750,000
City of Bakersfield: HOME/HOME-ARP	$2,324,446
HACK[1]: RAD	$2,000,000
HACK[1]	$4,100,000
Deferred Developer Fee	$1,092,687
Tax Credit Equity	$7,300,469
TOTAL	**$19,567,602**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Housing Authority of the County of Kern

Determination of Credit Amount(s)

Requested Eligible Basis:	$18,413,143
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$18,413,143
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$736,526
Total State Credit:	$1,300,000
Approved Developer Fee (in Project Cost & Eligible Basis)	$2,401,714
Federal Tax Credit Factor:	$0.85000
State Tax Credit Factor:	$0.80000

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
This project has senior housing in combination with non-senior housing. The applicant has provided a third-party legal opinion stating that the project complies with fair housing law, per CTCAC Regulation Section 10322(h)(34).

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
Preservation and Other Rehabilitation Project Prioriti	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
Total Points	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: 116.974%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Pioneer Drive Apartments, located at 3299 Pioneer Drive in Bakersfield on a 5.41 acre site, requested and is being recommended for a reservation of $1,041,975 in annual federal tax credits and $14,500,000 of tax-exempt bond cap to finance the new construction of 85 units of housing, consisting of 84 restricted rental units and 1 unrestricted manager's unit. The project will have 78 one-bedroom units, 6 two-bedroom units, and 1 three-bedroom unit, serving special needs tenants with rents affordable to households earning 30%-40% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Housing Authority of the County of Kern and will be located in Senate District 16 and Assembly District 35.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH) program of HCD.

Project Number CA-24-597

Project Name Pioneer Drive Apartments
Site Address: 3299 Pioneer Drive
Bakersfield, CA 93306
County: Kern
Census Tract: 11.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,041,975	$0
Recommended:	$1,041,975	$0

Tax-Exempt Bond Allocation
Recommended: $14,500,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Pioneer Drive Apartments LP
Contact: Stephen M. Pelz
Address: 601 24th Street, Suite B
Bakersfield, CA 93301
Phone: 661-631-8500
Email: Spelz@kernha.org

Bond Financing Information
CDLAC Applicant/Bond Issuer: Housing Authority of the County of Kern
Bond Counsel: Jones Hall, A Professional Law Corporation
Private Placement Purchaser: East West Bank

Development Team

General Partner(s) or Principal Owner(s):	GEAHI Pioneer Apartments LLC Kern Housing XVI LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Golden Empire Affordable Housing, Inc. Housing Authority of the County of Kern
Developer:	Housing Authority of the County of Kern
Investor/Consultant:	PNC Bank
Management Agent:	Housing Authority of the County of Kern

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	15	
Total # of Units:	85	
No. / % of Low Income Units:	84	100.00%
Average Targeted Affordability:	32.16%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME and HOME ARP / HUD Section 8 Project-based Vouchers (84 Units - 100%).	

Information

Housing Type:	Special Needs
Geographic Area:	Central Valley Region
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	84
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	41	49%
40% AMI:	43	51%

Unit Mix

78 1-Bedroom Units
6 2-Bedroom Units
1 3-Bedroom Units
85 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
41	1 Bedroom	30%	$438
37	1 Bedroom	40%	$619
6	2 Bedrooms	40%	$743
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$603,000
Construction Costs	$19,110,000
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$955,500
Soft Cost Contingency	$100,000
Relocation	$0
Architectural/Engineering	$725,000
Const. Interest, Perm. Financing	$1,489,830
Legal Fees	$215,000
Reserves	$749,494
Other Costs	$1,759,536
Developer Fee	$2,500,000
Commercial Costs	$0
Total	**$28,207,360**

Residential

Construction Cost Per Square Foot:	$402
Per Unit Cost:	$331,851
Estimated Hard Per Unit Cost:	$204,222
True Cash Per Unit Cost*:	$309,680
Bond Allocation Per Unit:	$170,588
Bond Allocation Per Restricted Rental Unit:	$172,619

Construction Financing

Source	Amount
East West Bank: Tax-Exempt	$14,500,000
East West Bank: Taxable	$2,000,000
Kern County: HOME-ARP	$4,500,000
Kern County: HOME	$750,000
Kern County Housing Authority	$1,757,593
Deferred Costs	$2,458,475
Tax Credit Equity	$2,241,292

Permanent Financing

Source	Amount
East West Bank: Tax-Exempt	$4,300,000
HCD: NPLH	$5,550,000
Kern County: HOME-ARP	$4,500,000
Kern County: HOME	$750,000
Kern County Housing Authority	$1,757,593
Kern County Housing Authority	$500,000
Deferred Developer Fee	$1,884,602
Solar Tax Credit Equity	$108,375
Tax Credit Equity	$8,856,790
TOTAL	**$28,207,360**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$26,051,988
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$26,051,988
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,041,975
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,500,000
Federal Tax Credit Factor:	$0.85000

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
The project will restrict 84 (100%) of the units to serve special needs tenants consisting of homeless and mentally disabled populations.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

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

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: .000%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Palm Villas at Millennium, located at Gerald Ford Drive between Dinah Shore Drive and Technology Drive in Palm Desert on a 6.02 acre site, requested and is being recommended for a reservation of $3,674,843 in annual federal tax credits and $10,397,147 in total state tax credits and $38,133,692 of tax-exempt bond cap to finance the new construction of 121 units of housing, consisting of 120 restricted rental units and 1 unrestricted manager's unit. The project will have 15 one-bedroom units, 75 two-bedroom units, and 31 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in August 2027. The project will be developed by D.L. Horn & Associates, LLC and will be located in Senate District 18 and Assembly District 47.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-600
Project Name	Palm Villas at Millennium
Site Address:	Gerald Ford Drive between Dinah Shore Drive and Technology Drive Palm Desert, CA 92211
County:	Riverside
Census Tract:	449.22

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$3,674,843	$10,397,147
Recommended:	$3,674,843	$10,397,147

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$38,133,692

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Kingdom Development, Inc.
Contact:	William Leach
Address:	6451 Box Springs Boulevard Riverside, CA 92507
Phone:	951-538-6244
Email:	william@kingdomdevelopment.net

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CSCDA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	PC Gerald Ford Developers, LLC Kingdom AQ, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Palm Communities Kingdom Development, Inc.
Developer:	D.L. Horn & Associates, LLC
Investor/Consultant:	Boston Financial
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	121	
No. / % of Low Income Units:	120	100.00%
Average Targeted Affordability:	43.05%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (120 Units - 100%) / American Rescue Plan Act (ARPA)	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	55
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	60	50%
60% AMI:	60	50%

Unit Mix

15	1-Bedroom Units
75	2-Bedroom Units
31	3-Bedroom Units
121	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	1 Bedroom	30%	$577
10	1 Bedroom	30%	$577
45	2 Bedrooms	30%	$658
30	2 Bedrooms	60%	$1,294
7	3 Bedrooms	60%	$1,438
23	3 Bedrooms	60%	$1,598
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,050,937
Construction Costs	$49,208,900
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,442,629
Soft Cost Contingency	$500,000
Relocation	$0
Architectural/Engineering	$1,238,000
Const. Interest, Perm. Financing	$7,161,619
Legal Fees	$860,800
Reserves	$719,371
Other Costs	$3,486,545
Developer Fee	$9,217,834
Commercial Costs	$0
Total	**$76,886,635**

Residential	
Construction Cost Per Square Foot:	$378
Per Unit Cost:	$635,427
Estimated Hard Per Unit Cost:	$351,041
True Cash Per Unit Cost*:	$588,239
Bond Allocation Per Unit:	$315,154
Bond Allocation Per Restricted Rental Unit:	$317,781

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$38,133,692
Citibank: Taxable	$11,823,249
County of Riverside: ARPA	$6,700,000
Palm Desert Housing Authority	$1,965,539
Deferred Costs	$12,182,984
Tax Credit Equity	$6,081,171

Permanent Financing

Source	Amount
Citibank: Tax Exempt	$21,970,188
County of Riverside: ARPA	$6,700,000
Palm Desert Housing Authority	$1,965,539
Deferred Developer Fee	$5,709,766
Tax Credit Equity	$40,541,142
TOTAL	**$76,886,635**

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

Requested Eligible Basis:	$70,670,065
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$91,871,085
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,674,843
Total State Credit:	$10,397,147
Approved Developer Fee (in Project Cost & Eligible Basis):	$9,217,834
Federal Tax Credit Factor:	$0.85991
State Tax Credit Factor:	$0.85991

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.
The project will restrict 55 (46%) of the units to serve special needs tenants, consisting of homeless populations.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 110.000%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Dakota, located at 3787 North Blackstone Avenue in Fresno on a 1.36 acre site, requested and is being recommended for a reservation of $2,585,113 in annual federal tax credits and $35,875,300 of tax-exempt bond cap to finance the new construction of 114 units of housing, consisting of 113 restricted rental units and 1 unrestricted manager's unit. The project will have 54 one-bedroom units, 30 two-bedroom units, and 30 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in September 2026. The project will be developed by UP Holdings California, LLC and will be located in Senate District 14 and Assembly District 31.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Infill Infrastructure Grant (IIG) and the Affordable Housing and Sustainable Communities (AHSC) programs of HCD.

Project Number CA-24-601

Project Name	Dakota
Site Address:	3787 North Blackstone Avenue Fresno, CA 93726
County:	Fresno
Census Tract:	49.01

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,585,113	$0
Recommended:	$2,585,113	$0

Tax-Exempt Bond Allocation

Recommended:	$35,875,300

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Dakota Fresno LP
Contact:	Sarah Ritten
Address:	6083 North Figarden Drive #656 Fresno, CA 93722
Phone:	708-207-4983
Email:	sarah@upholdings.net

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	U.S. Bank National Association

Development Team

General Partner(s) or Principal Owner(s):	Housing on Merit XXVI LLC UP Dakota LLC RHCB Dakota LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Housing on Merit UP Holdings California, LLC RHCB Development LP
Developer:	UP Holdings California, LLC
Investor/Consultant:	Enterprise Housing Credit Investments
Management Agent:	GSF Properties Inc. UPA, LLC

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	114	
No. / % of Low Income Units:	113	100.00%
Average Targeted Affordability:	48.96%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (45 Units - 39%)	

Information

Housing Type:	Large Family
Geographic Area:	Central Valley Region
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	30	27%
50% AMI:	32	28%
60% AMI:	51	45%

Unit Mix

54	1-Bedroom Units
30	2-Bedroom Units
30	3-Bedroom Units
114	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
8	1 Bedroom	30%	$495
8	1 Bedroom	30%	$495
6	2 Bedrooms	30%	$594
8	3 Bedrooms	30%	$685
12	1 Bedroom	50%	$825
5	2 Bedrooms	50%	$990
15	3 Bedrooms	50%	$1,143
8	1 Bedroom	60%	$990
17	1 Bedroom	60%	$990
19	2 Bedrooms	60%	$1,160
7	3 Bedrooms	60%	$1,371
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$926,702
Construction Costs	$46,256,051
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,310,940
Soft Cost Contingency	$119,963
Relocation	$0
Architectural/Engineering	$2,114,849
Const. Interest, Perm. Financing	$6,743,340
Legal Fees	$450,000
Reserves	$370,477
Other Costs	$2,633,651
Developer Fee	$8,400,000
Commercial Costs	$0
Total	**$70,325,973**

Residential	
Construction Cost Per Square Foot:	$355
Per Unit Cost:	$616,895
Estimated Hard Per Unit Cost:	$341,171
True Cash Per Unit Cost*:	$616,895
Bond Allocation Per Unit:	$314,696
Bond Allocation Per Restricted Rental Unit:	$317,481

Construction Financing

Source	Amount
US Bank: Tax-Exempt	$35,875,300
US Bank: Taxable	$20,558,226
City of Fresno: HOME	$3,000,000
HCD: IIG	$1,204,947
Developer Contribution	$4,700,000
Deferred Developer Fee	$1,500,000
Tax Credit Equity	$3,487,500

Permanent Financing

Source	Amount
US Bank: Tax-Exempt	$4,504,099
City of Fresno: HOME	$3,000,000
HCD: IIG	$1,204,947
HCD: AHSC	$33,184,957
Developer Contribution	$4,700,000
Deferred Developer Fee	$1,500,000
Tax Credit Equity	$22,231,970
TOTAL	**$70,325,973**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$64,686,170
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$64,686,170
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,585,113
Approved Developer Fee (in Project Cost & Eligible Basis):	$8,400,000
Federal Tax Credit Factor:	$0.86000
State Tax Credit Factor:	$0.83000

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 103.630%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Almond Gardens Apartments, located at 707 - 815 Almond Street in Suisun City on a 3.19 acre site, requested and is being recommended for a reservation of $2,917,820 in annual federal tax credits and $5,994,579 in total state tax credits and $30,276,660 of tax-exempt bond cap to finance the new construction of 97 units of housing, consisting of 96 restricted rental units and 1 unrestricted manager's unit. The project will have 57 two-bedroom units, 30 three-bedroom units, and 10 four-bedroom units, serving tenants with rents affordable to households earning 30%-50% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in January 2027. The project will be developed by Harbor Park, LLC and will be located in Senate District 3 and Assembly District 11.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number CA-24-602

Project Name Almond Gardens Apartments
Site Address: 707 - 815 Almond Street
Suisun City, CA 94585
County: Solano
Census Tract: 2527.02

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$2,917,820	$5,994,579
Recommended:	$2,917,820	$5,994,579

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation
Recommended: $30,276,660

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Harbor Park, LLC
Applicant for State Credits: Sudie M. Smith Foundation, Inc.
Contact: Camran Nojoomi
Address: 9700 Village Center Drive, Suite 120
Granite Bay , CA 95746
Phone: (707) 803-2816
Email: camran.nojoomi@ashriallc.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: CMFA
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: Citi Community Capital

Development Team

General Partner(s) or Principal Owner(s):	Harbor Park, LLC Sudie M. Smith Foundation, Inc.
General Partner Type:	Joint Venture
Parent Company(ies):	Harbor Park, LLC Sudie M. Smith Foundation, Inc.
Developer:	Harbor Park, LLC
Investor/Consultant:	CREA
Management Agent:	Domus Management Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	97	
No. / % of Low Income Units:	96	100.00%
Average Targeted Affordability:	39.99%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (96 Units - 100%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	Northern Region
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	48	50%
50% AMI:	48	50%

Unit Mix

57 2-Bedroom Units
30 3-Bedroom Units
10 4-Bedroom Units
97 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
28	2 Bedrooms	30%	$849
28	2 Bedrooms	50%	$1,416
15	3 Bedrooms	30%	$981
15	3 Bedrooms	50%	$1,635
5	4 Bedrooms	30%	$1,095
5	4 Bedrooms	50%	$1,825
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,557,898
Construction Costs	$40,335,644
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,009,265
Soft Cost Contingency	$500,000
Relocation	$3,120,000
Architectural/Engineering	$1,000,000
Const. Interest, Perm. Financing	$5,680,198
Legal Fees	$350,000
Reserves	$682,325
Other Costs	$3,571,723
Developer Fee	$7,318,947
Commercial Costs	$0
Total	**$66,126,000**

Residential	
Construction Cost Per Square Foot:	$516
Per Unit Cost:	$681,711
Estimated Hard Per Unit Cost:	$373,246
True Cash Per Unit Cost*:	$611,426
Bond Allocation Per Unit:	$312,131
Bond Allocation Per Restricted Rental Unit:	$315,382

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$30,276,660
Citibank: Taxable	$17,760,623
Suisun City: Land	$850,000
Impact Fee Waiver	$1,535,881
Deferred Developer Fee	$11,183,983
Tax Credit Equity	$4,518,853

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$28,332,648
Suisun City: Land	$850,000
Impact Fee Waiver	$1,535,881
Deferred Developer Fee	$5,281,785
Tax Credit Equity	$30,125,686
TOTAL	**$66,126,000**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$56,111,931
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$72,945,510
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,917,820
Total State Credit:	$5,994,579
Approved Developer Fee (in Project Cost & Eligible Basis):	$7,318,947
Federal Tax Credit Factor:	$0.85991
State Tax Credit Factor:	$0.83992

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 166.585%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 4345 Matilija, located at 4345 Matilija Avenue in Los Angeles on a 0.26 acre site, requested and is being recommended for a reservation of $827,924 in annual federal tax credits and $10,230,000 of tax-exempt bond cap to finance the new construction of 75 units of housing, consisting of 74 restricted rental units and 1 unrestricted manager's unit. The project will have 75 one-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in August 2026. The project will be developed by HVN Development, LLC and will be located in Senate District 24 and Assembly District 44.

Project Number CA-24-604

Project Name 4345 Matilija
Site Address: 4345 Matilija Avenue
Los Angeles, CA 91423
County: Los Angeles
Census Tract: 1411.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$827,924	$0
Recommended:	$827,924	$0

Tax-Exempt Bond Allocation
Recommended: $10,230,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: HVN Development, LLC
Contact: Tommy Beadel
Address: 7700 Irvine Center Drive, Suite 780
Irvine, CA 92618
Phone: 949-979-0833
Email: tommy@hvndevelopment.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: California Housing Finance Agency
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: KeyBank Real Estate Capital

Development Team
General Partner(s) or Principal Owner(s): HVN 4345 Matilija LLC
Affordable Housing Alliance II, Inc.
General Partner Type: Joint Venture
Parent Company(ies): HVN Holdings GP, LLC
Affordable Housing Alliance II, Inc.
Developer: HVN Development, LLC
Investor/Consultant: Key Community Development Corp.
Management Agent: Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	75	
No. / % of Low Income Units:	74	100.00%
Average Targeted Affordability:	57.56%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	8	11%
60% AMI:	42	57%
80% AMI*:	16	22%

*CTCAC restricted only

Unit Mix

75 1-Bedroom Units
75 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	1 Bedroom	30%	$780
3	1 Bedroom	30%	$780
7	1 Bedroom	50%	$1,300
1	1 Bedroom	50%	$1,300
42	1 Bedroom	60%	$1,560
3	1 Bedroom	80%	$1,787
9	1 Bedroom	80%	$1,787
4	1 Bedroom	80%	$1,787
1	1 Bedroom	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,693,413
Construction Costs	$10,952,252
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$549,586
Soft Cost Contingency	$190,000
Relocation	$0
Architectural/Engineering	$393,540
Const. Interest, Perm. Financing	$2,430,911
Legal Fees	$355,908
Reserves	$307,566
Other Costs	$721,829
Developer Fee	$2,076,731
Commercial Costs	$0
Total	**$20,671,736**

Residential	
Construction Cost Per Square Foot:	$246
Per Unit Cost:	$275,623
Estimated Hard Per Unit Cost:	$131,484
True Cash Per Unit Cost*:	$252,657
Bond Allocation Per Unit:	$136,400
Bond Allocation Per Restricted Rental Unit:	$176,379

Construction Financing

Source	Amount
KeyBank: Tax-Exempt	$10,230,000
KeyBank: Recycled Tax-Exempt	$4,245,000
Seller Carryback	$2,475,000
Deferred Costs	$307,566
Deferred Developer Fee	$1,661,384
Tax Credit Equity	$1,752,786

Permanent Financing

Source	Amount
KeyBank: Tax-Exempt	$12,161,000
Seller Carryback	$1,722,442
Tax Credit Equity	$6,788,294
TOTAL	**$20,671,736**

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

Determination of Credit Amount(s)	
Requested Eligible Basis:	$15,921,607
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$20,698,089
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$827,924
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,076,731
Federal Tax Credit Factor:	$0.81992

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
This project's annual per unit operating expense total is below the CTCAC published per unit operating minimum of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,359 on the agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 153.211%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 3981 Meier, located at 3981 Meier Street in Los Angeles on a 0.27 acre site, requested and is being recommended for a reservation of $871,550 in annual federal tax credits and $10,900,000 of tax-exempt bond cap to finance the new construction of 75 units of housing, consisting of 74 restricted rental units and 1 unrestricted manager's unit. The project will have 75 one-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in August 2026. The project will be developed by HVN Development, LLC and will be located in Senate District 28 and Assembly District 55.

Project Number	CA-24-605

Project Name	3981 Meier
Site Address:	3981 Meier Street Los Angeles, CA 90066
County:	Los Angeles
Census Tract:	2722.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$871,550	$0
Recommended:	$871,550	$0

Tax-Exempt Bond Allocation	
Recommended:	$10,900,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	HVN Development, LLC
Contact:	Tommy Beadel
Address:	7700 Irvine Center Drive, Suite 780 Irvine, CA 92618
Phone:	949-979-0833
Email:	tommy@hvndevelopment.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Key Bank

Development Team

General Partner(s) or Principal Owner(s):	HVN 3981 Meier LLC Integrity Housing
General Partner Type:	Joint Venture
Parent Company(ies):	HVN Holdings GP, LLC Affordable Housing Alliance II, Inc.
Developer:	HVN Development, LLC
Investor/Consultant:	Key Community Development Corp.
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	75
No. / % of Low Income Units:	74 100.00%
Average Targeted Affordability:	60.00%
Federal Set-Aside Elected:	40%/60% Average Income
Federal Subsidy:	Tax-Exempt

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	8	11%
50% AMI:	8	11%
60% AMI:	42	57%
80% AMI*:	16	22%

*CTCAC restricted only

Unit Mix

75 1-Bedroom Units
75 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
1	1 Bedroom	30%	$780
4	1 Bedroom	30%	$780
3	1 Bedroom	30%	$780
4	1 Bedroom	50%	$1,300
4	1 Bedroom	50%	$1,300
12	1 Bedroom	60%	$1,560
29	1 Bedroom	60%	$1,560
1	1 Bedroom	60%	$1,560
16	1 Bedroom	80%	$2,080
1	1 Bedroom	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$3,059,725
Construction Costs	$11,644,554
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$584,201
Soft Cost Contingency	$225,000
Relocation	$0
Architectural/Engineering	$333,960
Const. Interest, Perm. Financing	$2,471,040
Legal Fees	$363,260
Reserves	$307,579
Other Costs	$750,065
Developer Fee	$2,186,163
Commercial Costs	$0
Total	**$21,925,547**

Residential

Construction Cost Per Square Foot:	$250
Per Unit Cost:	$292,341
Estimated Hard Per Unit Cost:	$140,031
True Cash Per Unit Cost*:	$267,640
Bond Allocation Per Unit:	$145,333
Bond Allocation Per Restricted Rental Unit:	$187,931

Construction Financing

Source	Amount
KeyBank: Tax-Exempt	$10,900,000
KeyBank: Recycled Tax-Exempt	$3,675,000
Seller Carryback	$3,000,000
Deferred Costs	$307,579
Deferred Developer Fee	$1,749,840
Tax Credit Equity	$2,293,128

Permanent Financing

Source	Amount
KeyBank: Tax-Exempt	$12,927,000
Seller Carryback	$1,852,552
Tax Credit Equity	$7,145,995
TOTAL	**$21,925,547**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$16,760,586
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$21,788,762
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$871,550
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,186,163
Federal Tax Credit Factor:	$0.81992

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
This project's annual per unit operating expense total is below the CTCAC published per unit operating minimum of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,368 on the agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 149.902%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 3412 Victoria, located at 3412 Victoria Avenue in Los Angeles on a 0.21 acre site, requested and is being recommended for a reservation of $684,732 in annual federal tax credits and $8,150,000 of tax-exempt bond cap to finance the new construction of 58 units of housing, consisting of 57 restricted rental units and 1 unrestricted manager's unit. The project will have 50 one-bedroom units, and 8 two-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in August 2026. The project will be developed by HVN Development, LLC and will be located in Senate District 28 and Assembly District 55.

Project Number	CA-24-606
Project Name	3412 Victoria
Site Address:	3412 Victoria Avenue Los Angeles, CA 90016
County:	Los Angeles
Census Tract:	2200.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$684,732	$0
Recommended:	$684,732	$0

Tax-Exempt Bond Allocation

Recommended:	$8,150,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	3412 Victoria, LP
Contact:	Tommy Beadel
Address:	7700 Irvine Center Drive, Suite 780 Irvine, CA 92618
Phone:	949-979-0833
Email:	tommy@hvndevelopment.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	KeyBank Real Estate Capital

Development Team

General Partner(s) or Principal Owner(s):	HVN 3412 Victoria LLC Affordable Housing Alliance II, Inc. dba
General Partner Type:	Joint Venture
Parent Company(ies):	HVN Holdings GP, LLC Affordable Housing Alliance II, Inc.
Developer:	HVN Development, LLC
Investor/Consultant:	Veloce Partners
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	58
No. / % of Low Income Units:	57 100.00%
Average Targeted Affordability:	56.82%
Federal Set-Aside Elected:	40%/60% Average Income
Federal Subsidy:	Tax-Exempt

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	6	11%
50% AMI:	6	11%
60% AMI:	33	58%
80% AMI*:	12	21%

*CTCAC restricted only

Unit Mix

50 1-Bedroom Units
8 2-Bedroom Units
58 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	1 Bedroom	30%	$780
5	1 Bedroom	50%	$1,300
6	1 Bedroom	60%	$1,560
5	1 Bedroom	60%	$1,560
22	1 Bedroom	60%	$1,560
3	1 Bedroom	80%	$1,719
4	1 Bedroom	80%	$1,719
1	2 Bedrooms	30%	$936
1	2 Bedrooms	50%	$1,560
3	2 Bedrooms	80%	$1,973
2	2 Bedrooms	80%	$1,973
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$1,701,850
Construction Costs	$8,911,255
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$447,537
Soft Cost Contingency	$190,000
Relocation	$0
Architectural/Engineering	$275,538
Const. Interest, Perm. Financing	$2,084,522
Legal Fees	$402,026
Reserves	$245,573
Other Costs	$692,138
Developer Fee	$1,713,864
Commercial Costs	$0
Total	**$16,664,303**

Residential

Construction Cost Per Square Foot:	$269
Per Unit Cost:	$287,316
Estimated Hard Per Unit Cost:	$137,440
True Cash Per Unit Cost*:	$285,590
Bond Allocation Per Unit:	$140,517
Bond Allocation Per Restricted Rental Unit:	$181,111

Construction Financing

Source	Amount
KeyBank: Tax-Exempt	$8,150,000
KeyBank: Recycled Tax-Exempt	$3,850,000
General Partner Loan	$1,650,000
Deferred Costs	$245,573
Deferred Developer Fee	$1,371,091
Tax Credit Equity	$1,397,639

Permanent Financing

Source	Amount
KeyBank: Tax-Exempt	$8,150,000
KeyBank: Recycled Tax-Exempt	$1,150,000
General Partner Loan	$1,650,000
Deferred Developer Fee	$100,065
Tax Credit Equity	$5,614,238
TOTAL	**$16,664,303**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$13,167,917
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$17,118,292
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$684,732
Approved Developer Fee (in Project Cost & Eligible Basis):	$1,713,864
Federal Tax Credit Factor:	$0.81992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,535 on agreement of the permanent lender.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 147.689%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 5625 Case, located at 5625 Case Avenue in Los Angeles on a 0.37 acre site, requested and is being recommended for a reservation of $851,100 in annual federal tax credits and $10,270,000 of tax-exempt bond cap to finance the new construction of 70 units of housing, consisting of 69 restricted rental units and 1 unrestricted manager's unit. The project will have 22 one-bedroom units, and 48 two-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in August 2026. The project will be developed by HVN Development, LLC and will be located in Senate District 20 and Assembly District 44.

Project Number	CA-24-607
Project Name	5625 Case
Site Address:	5625 Case Avenue Los Angeles, CA 91601
County:	Los Angeles
Census Tract:	1242.04

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$851,100	$0
Recommended:	$851,100	$0

Tax-Exempt Bond Allocation	
Recommended:	$10,270,000

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	5625 Case LP
Contact:	Tommy Beadel
Address:	7700 Irvine Center Drive, Suite 780 Irvine, CA 92618
Phone:	949-979-0833
Email:	tommy@hvndevelopment.com

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	KeyBank

Development Team	
General Partner(s) or Principal Owner(s):	HVN 5625 Case LLC Affordable Housing Alliance II, Inc. dba Integrity Housing
General Partner Type:	Joint Venture
Parent Company(ies):	HVN Holdings GP, LLC Affordable Housing Alliance II, Inc.
Developer:	HVN Development, LLC
Investor/Consultant:	Veloce Partners
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	70	
No. / % of Low Income Units:	69	100.00%
Average Targeted Affordability:	56.86%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Dianne Myers

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	7	10%
50% AMI:	7	10%
60% AMI:	41	59%
80% AMI*:	14	20%

*CTCAC restricted only

Unit Mix

22	1-Bedroom Units
48	2-Bedroom Units
70	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
2	1 Bedroom	30%	$780
2	1 Bedroom	50%	$1,300
4	1 Bedroom	60%	$1,560
8	1 Bedroom	60%	$1,560
2	1 Bedroom	60%	$1,560
4	1 Bedroom	80%	$1,995
3	2 Bedrooms	30%	$936
2	2 Bedrooms	30%	$936
5	2 Bedrooms	50%	$1,560
22	2 Bedrooms	60%	$1,869
4	2 Bedrooms	60%	$1,869
1	2 Bedrooms	60%	$1,869
2	2 Bedrooms	80%	$1,869
8	2 Bedrooms	80%	$1,869
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,317,250
Construction Costs	$10,072,027
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,007,203
Soft Cost Contingency	$201,000
Relocation	$0
Architectural/Engineering	$789,685
Const. Interest, Perm. Financing	$3,106,868
Legal Fees	$343,417
Reserves	$318,974
Other Costs	$687,031
Developer Fee	$2,134,867
Commercial Costs	$0
Total	**$20,978,322**

Residential	
Construction Cost Per Square Foot:	$241
Per Unit Cost:	$299,690
Estimated Hard Per Unit Cost:	$129,275
True Cash Per Unit Cost*:	$287,547
Bond Allocation Per Unit:	$146,714
Bond Allocation Per Restricted Rental Unit:	$158,000

Construction Financing

Source	Amount
KeyBank: Tax-Exempt	$10,270,000
KeyBank: Recycled Tax-Exempt	$6,730,000
Deferred Reserves	$318,974
Deferred Developer Fee	$1,707,894
Tax Credit Equity	$1,951,454

Permanent Financing

Source	Amount
KeyBank: Tax-Exempt	$13,150,000
Deferred Developer Fee	$850,000
Tax Credit Equity	$6,978,322
TOTAL	**$20,978,322**

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

Determination of Credit Amount(s)	
Requested Eligible Basis:	$16,367,315
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$21,277,510
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$851,100
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,134,867
Federal Tax Credit Factor:	$0.81992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,507 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 172.193%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 5749 Brynhurst, located at 5749 Brynhurst Avenue in Los Angeles on a 0.32 acre site, requested and is being recommended for a reservation of $504,699 in annual federal tax credits and $8,065,000 of tax-exempt bond cap to finance the new construction of 53 units of housing, consisting of 52 restricted rental units and 1 unrestricted manager's unit. The project will have 4 one-bedroom units, 38 two-bedroom units, and 11 three-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in August 2026. The project will be developed by HVN Development, LLC and will be located in Senate District 28 and Assembly District 55.

Project Number CA-24-608

Project Name 5749 Brynhurst

Site Address:	5749 Brynhurst Avenue Los Angeles, CA 90043
County:	Los Angeles
Census Tract:	2346.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$504,699	$0
Recommended:	$504,699	$0

Tax-Exempt Bond Allocation

Recommended:	$8,065,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	5749 Brynhurst LP
Contact:	Tommy Beadel
Address:	7700 Irvine Center Drive, Suite 780 Irvine, CA 92618
Phone:	949-979-0833
Email:	tommy@hvndevelopment.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	KeyBank Community Development Lending

Development Team

General Partner(s) or Principal Owner(s):	HVN 5749 Brynhurst LLC Affordable Housing Alliance II, Inc. dba Integrity Housing
General Partner Type:	Joint Venture
Parent Company(ies):	HVN Holdings GP, LLC Affordable Housing Alliance II, Inc.
Developer:	HVN Development, LLC
Investor/Consultant:	Veloce Partners
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	53	
No. / % of Low Income Units:	52	100.00%
Average Targeted Affordability:	50.97%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Dianne Myers

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	6	12%
50% AMI:	6	12%
60% AMI:	28	54%
80% AMI*:	12	23%

*CTCAC restricted only

Unit Mix

4	1-Bedroom Units
38	2-Bedroom Units
11	3-Bedroom Units
53	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
4	1 Bedroom	60%	$1,396
3	2 Bedrooms	30%	$936
1	2 Bedrooms	30%	$936
4	2 Bedrooms	50%	$1,560
17	2 Bedrooms	60%	$1,724
7	2 Bedrooms	60%	$1,724
5	2 Bedrooms	80%	$1,724
2	3 Bedrooms	30%	$1,081
2	3 Bedrooms	50%	$1,803
4	3 Bedrooms	80%	$1,820
3	3 Bedrooms	80%	$1,820
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$2,058,615
Construction Costs	$8,437,136
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$423,831
Soft Cost Contingency	$190,000
Relocation	$0
Architectural/Engineering	$304,932
Const. Interest, Perm. Financing	$2,383,738
Legal Fees	$328,991
Reserves	$232,302
Other Costs	$562,485
Developer Fee	$1,645,758
Commercial Costs	$0
Total	**$16,567,788**

Residential

Construction Cost Per Square Foot:	$208
Per Unit Cost:	$312,600
Estimated Hard Per Unit Cost:	$142,123
True Cash Per Unit Cost*:	$289,681
Bond Allocation Per Unit:	$152,170
Bond Allocation Per Restricted Rental Unit:	$155,096

Construction Financing

Source	Amount
KeyBank: Tax-Exempt	$8,065,000
KeyBank: Recycled Tax-Exempt	$5,435,000
General Partner Loan	$1,800,000
Deferred Reserves	$53,018
Deferred Developer Fee	$1,214,670
Tax Credit Equity	$100

Permanent Financing

Source	Amount
KeyBank: Tax-Exempt	$9,415,000
General Partner Loan	$1,800,000
Deferred Developer Fee	$1,214,670
Tax Credit Equity	$4,138,118
TOTAL	**$16,567,788**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$12,617,479
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$12,617,479
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$504,699
Approved Developer Fee (in Project Cost & Eligible Basis):	$1,645,758
Federal Tax Credit Factor:	$0.81992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,596 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 187.259%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 8911 Ramsgate, located at 8911 Ramsgate Avenue in Los Angeles on a 0.32 acre site, requested and is being recommended for a reservation of $878,703 in annual federal tax credits and $10,600,000 of tax-exempt bond cap to finance the new construction of 77 units of housing, consisting of 76 restricted rental units and 1 unrestricted manager's unit. The project will have 53 one-bedroom units, and 24 two-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in August 2026. The project will be developed by HVN Development, LLC and will be located in Senate District 28 and Assembly District 61.

Project Number CA-24-609

Project Name 8911 Ramsgate
Site Address: 8911 Ramsgate Avenue
Los Angeles, CA 90045
County: Los Angeles
Census Tract: 2772.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$878,703	$0
Recommended:	$878,703	$0

Tax-Exempt Bond Allocation
Recommended: $10,600,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	HVN Development, LLC
Contact:	Tommy Beadel
Address:	7700 Irvine Center Drive, Suite 780 Irvine, CA 92618
Phone:	949-979-0833
Email:	tommy@hvndevelopment.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	KeyBank Community Development Lending

Development Team

General Partner(s) or Principal Owner(s):	HVN 8911 Ramsgate LLC Affordable Housing Alliance II, Inc. dba Integrity Housing, sole member of to be formed LLC MGP
General Partner Type:	Joint Venture
Parent Company(ies):	HVN Holdings GP, LLC Affordable Housing Alliance II, Inc.
Developer:	HVN Development, LLC
Investor/Consultant:	Veloce Partners
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	77	
No. / % of Low Income Units:	76	100.00%
Average Targeted Affordability:	58.56%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Dianne Myers

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	8	11%
50% AMI:	8	11%
60% AMI:	44	58%
80% AMI*:	16	21%

*CTCAC restricted only

Unit Mix

53	1-Bedroom Units
24	2-Bedroom Units
77	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	1 Bedroom	30%	$780
5	1 Bedroom	50%	$1,300
5	1 Bedroom	60%	$1,560
5	1 Bedroom	60%	$1,560
4	1 Bedroom	60%	$1,560
5	1 Bedroom	60%	$1,560
1	1 Bedroom	60%	$1,560
9	1 Bedroom	60%	$1,560
4	1 Bedroom	60%	$1,560
1	1 Bedroom	80%	$1,822
4	1 Bedroom	80%	$1,822
5	1 Bedroom	80%	$1,822
1	2 Bedrooms	30%	$936
2	2 Bedrooms	30%	$936
3	2 Bedrooms	50%	$1,560
4	2 Bedrooms	60%	$1,872
5	2 Bedrooms	60%	$1,872
2	2 Bedrooms	60%	$1,872
2	2 Bedrooms	80%	$2,441
4	2 Bedrooms	80%	$2,441
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,386,225
Construction Costs	$11,011,887
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$994,623
Soft Cost Contingency	$250,000
Relocation	$0
Architectural/Engineering	$321,321
Const. Interest, Perm. Financing	$2,978,439
Legal Fees	$355,011
Reserves	$333,490
Other Costs	$719,540
Developer Fee	$2,204,105
Commercial Costs	$0
Total	**$21,554,641**

Residential

Construction Cost Per Square Foot:	$237
Per Unit Cost:	$279,930
Estimated Hard Per Unit Cost:	$129,995
True Cash Per Unit Cost*:	$273,697
Bond Allocation Per Unit:	$137,662
Bond Allocation Per Restricted Rental Unit:	$176,667

Construction Financing

Source	Amount
KeyBank: Tax-Exempt	$10,600,000
KeyBank: Recycled Tax-Exempt	$7,250,000
Deferred Reserves	$333,490
Deferred Developer Fee	$1,553,898
Tax Credit Equity	$1,817,253

Permanent Financing

Source	Amount
KeyBank: Tax-Exempt	$13,870,000
Deferred Developer Fee	$479,999
Tax Credit Equity	$7,204,642
TOTAL	**$21,554,641**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$16,898,143
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$21,967,586
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$878,703
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,204,105
Federal Tax Credit Factor:	$0.81992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,458 on agreement of the permanent lender and investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 174.055%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Monarch Hillside Affordable Apartments, located at 4850 Market Street in San Diego on a 5.7 acre site, requested and is being recommended for a reservation of $1,264,581 in annual federal tax credits and $13,500,000 of tax-exempt bond cap to finance the new construction of 51 units of housing, consisting of 50 restricted rental units and 1 unrestricted manager's unit. The project will have 21 one-bedroom units, 25 two-bedroom units, and 5 three-bedroom units, serving tenants with rents affordable to households earning 30%-50% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in October 2027. The project will be developed by Monarch Group & Klein Financial Corp and will be located in Senate District 39 and Assembly District 79.

Project Number CA-24-615

Project Name Monarch Hillside Affordable Apartments
Site Address: 4850 Market Street
San Diego, CA 92102
County: San Diego
Census Tract: 34.04

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,264,581	$0
Recommended:	$1,264,581	$0

Tax-Exempt Bond Allocation
Recommended: $13,500,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Monarch Hillside Affordable Partners, LP
Contact: Erik Schraner
Address: 7727 Herschel Avenue
La Jolla, CA 92037
Phone: 619-251-8200
Email: eschraner@monarchgroup.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: California Housing Finance Agency
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: Walker & Dunlop

Development Team

General Partner(s) or Principal Owner(s):	Monarch Hillside GP, LLC AOFP LA MGP LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Klein Financial Corporation/Monarch Hillside, LLC AOF/Pacific Affordable Housing Corp
Developer:	Monarch Group & Klein Financial Corp
Investor/Consultant:	Walker & Dunlop Affordable Equity
Management Agent:	Greystar Management Services, LLC

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	51	
No. / % of Low Income Units:	50	100.00%
Average Targeted Affordability:	48.00%	
Federal Set-Aside Elected:	20%/50%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	San Diego County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Danielle Stevenson
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	5	10%
50% AMI:	45	90%

Unit Mix

21	1-Bedroom Units
25	2-Bedroom Units
5	3-Bedroom Units
51	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
4	1 Bedroom	30%	$852
1	1 Bedroom	30%	$852
15	1 Bedroom	50%	$1,420
22	2 Bedrooms	50%	$1,705
3	2 Bedrooms	50%	$1,705
5	3 Bedrooms	50%	$1,970
1	1 Bedroom	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$0
Construction Costs	$15,990,820
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$762,513
Soft Cost Contingency	$327,782
Relocation	$0
Architectural/Engineering	$741,446
Const. Interest, Perm. Financing	$1,938,547
Legal Fees	$71,687
Reserves	$202,808
Other Costs	$1,896,991
Developer Fee	$3,150,000
Commercial Costs	$0
Total	**$25,082,594**

Residential	
Construction Cost Per Square Foot:	$342
Per Unit Cost:	$491,816
Estimated Hard Per Unit Cost:	$265,360
True Cash Per Unit Cost*:	$479,070
Bond Allocation Per Unit:	$264,706
Bond Allocation Per Restricted Rental Unit:	$270,000

Construction Financing

Source	Amount
Walker & Dunlop: Tax-Exempt	$13,000,000
W&D: Recycled Tax-Exempt	$2,600,000
W&D: Bridge Loan	$8,293,655
Deferred Developer Fee	$650,000
Tax Credit Equity	$538,939

Permanent Financing

Source	Amount
Walker & Dunlop (W&D): Tax-Exempt	$9,500,000
W&D: Recycled Tax-Exempt	$2,600,000
Sponsor Loan	$1,583,655
Deferred Developer Fee	$650,000
Tax Credit Equity	$10,748,939
TOTAL	**$25,082,594**

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

Determination of Credit Amount(s)	
Requested Eligible Basis:	$24,318,864
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$31,614,523
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,264,581
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,150,000
Federal Tax Credit Factor:	$0.85000

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
The project includes 51 parking spaces with an estimated cost to build of $178,500. Staff confirmed this cost is excluded from the project's eligible basis, as tenants will be charged for parking.

The current legal description is part of a larger site and the project site's parcel (legal description and APN) have not yet been finalized. The project includes 50 low-income units and 1 manager's unit, scattered amongst a larger market-rate project to include 249 total units. The LIHTC project must be legally separated from the market-rate project. The legal description and APN for CA-24-615 must be completed as part of the placed in service package.

This project is an air rights project that will share community space with the market-rate project located in the same building. Common areas will be shared in accordance with the reciprocal easement agreement, and the cost will be allocated accordingly to the affordable project.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 128.689%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Pleasant View Apartments, located at 3555 North Pleasant Avenue in Fresno on a 3.72 acre site, requested and is being recommended for a reservation of $1,158,372 in annual federal tax credits and $13,900,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 60 units of housing, consisting of 59 restricted rental units and 1 unrestricted manager's unit. The project has 10 one-bedroom units, 25 two-bedroom units, 15 three-bedroom units, and 10 four-bedroom units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2026. The project will be developed by American Community Developers, Inc. and is located in Senate District 14 and Assembly District 31.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Contract.

Project Number	CA-24-617
Project Name	Pleasant View Apartments
Site Address:	3555 North Pleasant Avenue Fresno, CA 93705
County:	Fresno
Census Tract:	47.04

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,158,372	$0
Recommended:	$1,158,372	$0

Tax-Exempt Bond Allocation

Recommended:	$13,900,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Pleasant View 2024 Limited Partnership
Contact:	Derek M. Skrzynski
Address:	20250 Harper Avenue Detroit, MI 48225
Phone:	760-448-5510
Email:	derek@acdmail.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Public Sale:	Rated
Underwriter:	The Sturges Company
Rating:	AAA/VMIG1

Development Team

General Partner(s) or Principal Owner(s):	AOF Cameron Villa LLC American Community Developers, Inc.
General Partner Type:	Joint Venture
Parent Company(ies):	AOF/Pacific Affordable Housing Corp. American Community Developers, Inc.
Developer:	American Community Developers, Inc.
Investor/Consultant:	CREA
Management Agent:	Independent Management Services

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	10	
Total # of Units:	60	
No. / % of Low Income Units:	59	100.00%
Average Targeted Affordability:	50.00%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Contract (60 Units - 100%) / HUD Green and Resilient Retrofit Program (GRRP) / HUD 221(d)(4)	

Information

Housing Type:	Non-Targeted
Geographic Area:	Central Valley Region
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	7	12%
40% AMI:	11	19%
50% AMI:	16	27%
60% AMI:	25	42%

Unit Mix

10	1-Bedroom Units
25	2-Bedroom Units
15	3-Bedroom Units
10	4-Bedroom Units
60	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
1	1 Bedroom	30%	$495
2	1 Bedroom	40%	$660
3	1 Bedroom	50%	$825
3	1 Bedroom	60%	$990
3	2 Bedrooms	30%	$594
6	2 Bedrooms	40%	$792
6	2 Bedrooms	50%	$990
10	2 Bedrooms	60%	$1,188
2	3 Bedrooms	30%	$685
2	3 Bedrooms	40%	$914
4	3 Bedrooms	50%	$1,143
7	3 Bedrooms	60%	$1,371
1	4 Bedrooms	30%	$765
1	4 Bedrooms	40%	$1,020
3	4 Bedrooms	50%	$1,275
5	4 Bedrooms	60%	$1,530
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$14,572,000
Construction Costs	$0
Rehabilitation Costs	$7,299,232
Construction Hard Cost Contingency	$725,153
Soft Cost Contingency	$55,000
Relocation	$357,000
Architectural/Engineering	$160,785
Const. Interest, Perm. Financing	$1,666,286
Legal Fees	$150,700
Reserves	$441,965
Other Costs	$193,999
Developer Fee	$3,378,318
Commercial Costs	$0
Total	**$29,000,438**

Residential

Construction Cost Per Square Foot:	$126
Per Unit Cost:	$483,341
Estimated Hard Per Unit Cost:	$105,148
True Cash Per Unit Cost*:	$448,780
Bond Allocation Per Unit:	$231,667
Bond Allocation Per Restricted Rental Unit:	$235,593

Construction Financing

Source	Amount
TSC[1]: Tax-Exempt	$13,900,000
HUD: GRRP	$3,600,000
Tax Credit Equity	$7,053,780

Permanent Financing

Source	Amount
Berkadia: HUD 221(d)(4)	$13,250,000
HUD: GRRP	$3,600,000
Deferred Developer Fee	$2,073,609
Tax Credit Equity	$10,076,829
TOTAL	**$29,000,438**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]The Sturges Company

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$10,196,238
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$15,704,201
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$13,255,109
Qualified Basis (Acquisition):	$15,704,201
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$530,204
Maximum Annual Federal Credit, Acquisition:	$628,168
Total Maximum Annual Federal Credit:	$1,158,372
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,378,318
Federal Tax Credit Factor:	$0.86991

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
The reservation of tax credits is contingent upon verification of the rental subsidy annual amount, number of units receiving assistance, term, and expiration date by the bond issuance deadline.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 159.119%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

U.S.VETS-WLAVA Building 300, located at 11410 Patton Avenue in Los Angeles on a 2.05 acre site, requested and is being recommended for a reservation of $2,218,421 in annual federal tax credits and $23,305,313 of tax-exempt bond cap to finance the new construction & adaptive reuse of 44 units of housing, consisting of 43 restricted rental units and 1 unrestricted manager's unit. The project will have 15 studio units, 25 one-bedroom units, and 4 two-bedroom units, serving special needs tenants with rents affordable to households earning 30%-50% of area median income (AMI). The rehabilitation is expected to begin in June 2025 and be completed in June 2027. The project will be developed by U.S.VETS Housing Corporation and will be located in Senate District 24 and Assembly District 42.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Veterans Housing and Homelessness Prevention (VHHP) program of HCD.

Project Number	CA-24-622

Project Name	U.S.VETS-WLAVA Building 300
Site Address:	11410 Patton Avenue Los Angeles, CA 90049
County:	Los Angeles
Census Tract:	9800

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,218,421	$0
Recommended:	$2,218,421	$0

Tax-Exempt Bond Allocation	
Recommended:	$23,305,313

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	U.S.VETS-WLAVA Building 300, LLC
Contact:	Lori Allgood
Address:	800 West 6th Street, Suite 1505 Los Angeles, CA 90017
Phone:	213-610-7649
Email:	lallgood@usvets.org

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	U.S.VETS - WLAVA Building 300, LLC Kingdom WLAVA Building 300, LLC
General Partner Type:	Nonprofit
Parent Company(ies):	U.S.VETS Housing Corporation Kingdom Development, Inc.
Developer:	U.S.VETS Housing Corporation
Investor/Consultant:	CREA LLC
Management Agent:	Hyder Property Management Professionals

Project Information

Construction Type:	New Construction & Adaptive Reuse	
Total # Residential Buildings:	1	
Total # of Units:	44	
No. / % of Low Income Units:	43	100.00%
Average Targeted Affordability:	42.09%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Community Project Funding (CPF) / HUD Section 8 Project-based Vouchers (43 Units - 100%) / US Department of Veterans Affairs (US VA)	

Information

Housing Type:	Special Needs
Geographic Area:	Balance of Los Angeles County
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	33
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	17	40%
50% AMI:	26	60%

Unit Mix

15	SRO/Studio Units
25	1-Bedroom Units
4	2-Bedroom Units
44	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
8	SRO/Studio	30%	$728
7	SRO/Studio	50%	$1,213
7	1 Bedroom	30%	$780
7	1 Bedroom	50%	$1,300
10	1 Bedroom	50%	$1,300
2	2 Bedrooms	30%	$936
2	2 Bedrooms	50%	$1,560
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$120,000
Construction Costs	$26,302,469
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,651,019
Soft Cost Contingency	$350,000
Relocation	$0
Architectural/Engineering	$3,644,619
Const. Interest, Perm. Financing	$5,803,866
Legal Fees	$385,000
Reserves	$2,008,979
Other Costs	$1,032,457
Developer Fee	$5,564,601
Commercial Costs	$0
Total	**$47,863,010**

Residential	
Construction Cost Per Square Foot:	$655
Per Unit Cost:	$1,087,796
Estimated Hard Per Unit Cost:	$521,810
True Cash Per Unit Cost*:	$1,016,992
Bond Allocation Per Unit:	$529,666
Bond Allocation Per Restricted Rental Unit:	$541,984

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$23,305,313
Citibank: Taxable	$10,808,670
HUD: CPF	$749,600
The Home Depot Foundation	$300,000
Deferred Costs	$9,100,868
Tax Credit Equity	$3,598,559

Permanent Financing

Source	Amount
Citibank: Tax Exempt	$4,955,609
HUD: CPF	$749,600
US VA: Capital Contribution	$5,176,991
HCD: VHHP	$9,575,074
The Home Depot Foundation	$300,000
Deferred Developer Fee	$3,115,343
Tax Credit Equity	$18,078,323
TOTAL	**$47,863,010**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$42,661,943
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$55,460,526
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,218,421
Approved Developer Fee (in Project Cost & Eligible Basis):	$5,564,601
Federal Tax Credit Factor:	$0.81492

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

Development costs are roughly $1,016,992 per unit. The factors affecting this cost includes elevated interest rates, seismic upgrades and preservation of historical resources, construction supply chain issues, and prevailing wage requirements.

The proposed rent does not include a utility allowance. The owner will pay for all utilities.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 90.907%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Dry Creek Commons, located at 155 Dry Creek Road in Healdsburg on a 3.53 acre site, requested and is being recommended for a reservation of $2,375,592 in annual federal tax credits and $26,627,000 of tax-exempt bond cap to finance the new construction of 58 units of housing, consisting of 57 restricted rental units and 1 unrestricted manager's unit. The project will have 28 one-bedroom units, 15 two-bedroom units, and 15 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in September 2026. The project will be developed by Burbank Housing Development Corporation and will be located in Senate District 2 and Assembly District 2.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Joe Serna, Jr. Farmworker Housing Grant program of HCD.

Project Number CA-24-623

Project Name Dry Creek Commons
Site Address: 155 Dry Creek Road
Healdsburg, CA 95448
County: Sonoma
Census Tract: 1539.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,375,592	$0
Recommended:	$2,375,592	$0

Tax-Exempt Bond Allocation
Recommended: $26,627,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Burbank Housing Development Corporation
Contact:	Jocelyn Lin
Address:	1425 Corporate Center Parkway Santa Rosa, CA 95407
Phone:	707-303-0590
Email:	jlin@burbankhousing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Silicon Valley Bank, a division of First-Citizens Bank & Trust C

Development Team

General Partner(s) or Principal Owner(s):	BHDC Dry Creek Commons, LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Burbank Housing Development Corporation
Developer:	Burbank Housing Development Corporation
Investor/Consultant:	California Housing Partnership
Management Agent:	Burbank Housing Management Corporation

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	2
Total # of Units:	58
No. / % of Low Income Units:	57 100.00%
Average Targeted Affordability:	46.66%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HOME / HUD Section 8 Project-based Vouchers (14 Units - 25%) / Community Development Block Grant (CDBG) / Community Development Block Grant-Disaster Recovery (CDBG-DR)

Information

Housing Type:	Large Family
Geographic Area:	Northern Region
State Ceiling Pool:	N/A
Set Aside:	N/A
Homeless Set Aside Units:	6
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Dianne Myers

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	10	18%
45% AMI:	12	21%
50% AMI:	28	49%
60% AMI:	7	12%

Unit Mix

28	1-Bedroom Units
15	2-Bedroom Units
15	3-Bedroom Units
58	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	1 Bedroom	30%	$778
1	2 Bedrooms	30%	$933
1	1 Bedroom	30%	$778
1	2 Bedrooms	30%	$933
2	3 Bedrooms	30%	$1,078
3	1 Bedroom	45%	$1,167
3	2 Bedrooms	45%	$1,400
4	3 Bedrooms	45%	$1,618
2	2 Bedrooms	45%	$1,400
9	1 Bedroom	50%	$1,297
5	2 Bedrooms	50%	$1,556
8	3 Bedrooms	50%	$1,798
6	1 Bedroom	50%	$1,297
3	1 Bedroom	60%	$1,557
3	2 Bedrooms	60%	$1,867
1	3 Bedrooms	60%	$2,157
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,939,923
Construction Costs	$31,400,014
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,587,102
Soft Cost Contingency	$263,230
Relocation	$0
Architectural/Engineering	$1,900,000
Const. Interest, Perm. Financing	$4,090,852
Legal Fees	$70,000
Reserves	$464,437
Other Costs	$2,432,276
Developer Fee	$5,958,843
Commercial Costs	$0
Total	**$51,106,677**

Residential

Construction Cost Per Square Foot:	$511
Per Unit Cost:	$881,150
Estimated Hard Per Unit Cost:	$490,188
True Cash Per Unit Cost*:	$821,514
Bond Allocation Per Unit:	$459,086
Bond Allocation Per Restricted Rental Unit:	$467,140

Construction Financing

Source	Amount
SVB[1]: Tax-Exempt	$26,627,000
SVB[1]: Taxable	$1,842,634
Sonoma County: HOME	$551,476
Sonoma County: CDBG	$971,455
HCD: Joe Serna	$9,709,674
City of Healdsburg	$1,000,000
Land Donation	$2,730,000
Deferred Costs	$2,260,037
Deferred Developer Fee	$3,458,843
Tax Credit Equity	$1,955,558

Permanent Financing

Source	Amount
SVB[1]: Tax-Exempt	$3,255,000
Sonoma County: HOME	$612,751
Sonoma County: CDBG	$1,079,394
CDBG-DR	$8,706,428
HCD: Joe Serna	$9,709,674
City of Healdsburg	$1,000,000
Land Donation	$2,730,000
Deferred Developer Fee	$3,458,843
Tax Credit Equity	$20,554,587
TOTAL	**$51,106,677**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Silicon Valley Bank

Determination of Credit Amount(s)

Requested Eligible Basis:	$45,684,469
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$59,389,810
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,375,592
Approved Developer Fee (in Project Cost & Eligible Basis):	$5,958,843
Federal Tax Credit Factor:	$0.86524

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 86.016%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Maison's Sierra - Phase 2, located at West Avenue H-2 and Schamise Street in Lancaster on a 12.5 acre site, requested and is being recommended for a reservation of $2,500,000 in annual federal tax credits and $25,500,000 of tax-exempt bond cap to finance the new construction of 171 units of housing, consisting of 169 restricted rental units and 2 unrestricted manager's units. The project will have 132 one-bedroom units, and 39 two-bedroom units, serving tenants with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Ravello Holdings, Inc. and will be located in Senate District 21 and Assembly District 39.

Project Number	CA-24-624	
Project Name	Maison's Sierra - Phase 2	
Site Address:	West Avenue H-2 and Schamise Street Lancaster, CA 93534	
County:	Los Angeles	
Census Tract:	9008.04	
Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,500,000	$0
Recommended:	$2,500,000	$0
Tax-Exempt Bond Allocation		
Recommended:	$25,500,000	

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Maison's Sierra Phase 2, LP
Contact:	Phil Ram
Address:	2007 Cedar Avenue Manhattan Beach, CA 90266
Phone:	310-979-3210
Email:	pram@ravelloholdings.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Merchant Capital, L.L.C.

Development Team

General Partner(s) or Principal Owner(s):	Ravello MODs Sierra Phase 2, LLC AHA High Desert II MGP, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Ravello Holdings, Inc. Affordable Housing Access, Inc.
Developer:	Ravello Holdings, Inc.
Investor/Consultant:	WNC
Management Agent:	CONAM Management Corporation

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	171
Total # of Units:	171
No. / % of Low Income Units:	169 100.00%
Average Targeted Affordability:	57.48%
Federal Set-Aside Elected:	40%/60% Average Income
Federal Subsidy:	Tax-Exempt

Information

Housing Type:	Non-Targeted
Geographic Area:	Balance of Los Angeles County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	17	10%
50% AMI:	26	15%
60% AMI:	51	30%
70% AMI*:	75	44%

*CTCAC restricted only

Unit Mix

132 1-Bedroom Units
39 2-Bedroom Units
171 Total Units

Unit Type & Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
14 1 Bedroom	30%	$780
19 1 Bedroom	50%	$1,178
44 1 Bedroom	60%	$1,560
38 1 Bedroom	70%	$1,700
17 1 Bedroom	70%	$1,820
3 2 Bedrooms	30%	$936
7 2 Bedrooms	50%	$1,326
7 2 Bedrooms	60%	$1,872
15 2 Bedrooms	70%	$2,000
5 2 Bedrooms	70%	$2,184
2 2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$1,243,479
Construction Costs	$31,925,003
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,583,408
Soft Cost Contingency	$506,500
Relocation	$0
Architectural/Engineering	$1,250,000
Const. Interest, Perm. Financing	$4,917,500
Legal Fees	$320,000
Reserves	$591,560
Other Costs	$3,140,000
Developer Fee	$6,150,000
Commercial Costs	$0
Total	**$52,627,450**

Residential

Construction Cost Per Square Foot:	$241
Per Unit Cost:	$307,763
Estimated Hard Per Unit Cost:	$159,848
True Cash Per Unit Cost*:	$287,325
Bond Allocation Per Unit:	$149,123
Bond Allocation Per Restricted Rental Unit:	$271,277

Construction Financing

Source	Amount
Merchants Capital: Tax-Exempt	$25,500,000
Merchants Capital: Taxable	$8,115,940
Merchants Capital: Recycled Tax-Exempt	$4,300,000
Deferred Costs	$4,086,510
Tax Credit Equity	$10,625,000

Permanent Financing

Source	Amount
Merchants Capital: Tax-Exempt	$23,500,000
Merchants Capital: Taxable	$4,000,000
Deferred Developer Fee	$3,494,950
Solar Tax Credit Equity	$382,500
Tax Credit Equity	$21,250,000
TOTAL	**$52,627,450**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$48,181,921
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$62,636,497
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,500,000
Approved Developer Fee (in Project Cost & Eligible Basis):	$6,150,000
Federal Tax Credit Factor:	$0.85000

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,090. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,520 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 130.582%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Paseo Senter I Rehab, located at 1898 Senter Road in San Jose on a 2.5 acre site, requested and is being recommended for a reservation of $1,780,278 in annual federal tax credits and $21,900,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 117 units of housing, consisting of 115 restricted rental units and 2 unrestricted manager's units. The project has 25 one-bedroom units, 59 two-bedroom units, and 33 three-bedroom units, serving tenants with rents affordable to households earning 15%-45% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in July 2026. The project will be developed by Core Affordable Housing, LLC and is located in Senate District 15 and Assembly District 25.

Paseo Senter I Rehab is a re-syndication of an existing Low Income Housing Tax Credit (LIHTC) project, (CA-2005-915). See Resyndication and Resyndication Transfer Event below for additional information. The project financing includes state funding from the Multifamily Housing Program (MHP) of HCD.

Project Number CA-24-627

Project Name Paseo Senter I Rehab
Site Address: 1898 Senter Road
San Jose, CA 95112
County: Santa Clara
Census Tract: 5031.22

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,780,278	$0
Recommended:	$1,780,278	$0

Tax-Exempt Bond Allocation
Recommended: $21,900,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	PSI Rehab, LP
Contact:	Chris Neale
Address:	470 S Market St San Jose, CA 95113
Phone:	408-292-7841
Email:	chris@thecorecompanies.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Jones Hall, A Professional Law Corporation
Public Sale:	Credit Enhanced
Underwriter:	RBC Capital Markets, LLC
Credit Enhancement Provider:	Fannie Mae

Development Team

General Partner(s) or Principal Owner(s):	Core PSI Rehab, LLC AOF Paseo Senter LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Core Affordable Housing, LLC AOF/Pacific Affordable Housing Corp.
Developer:	Core Affordable Housing, LLC
Investor/Consultant:	NEF Inc.
Management Agent:	EAH, Inc.

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	1	
Total # of Units:	117	
No. / % of Low Income Units:	115	100.00%
Average Targeted Affordability:	37.87%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	South and West Bay Region
State Ceiling Pool:	Other Rehabilitation
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
15% AMI:	12	10%
25% AMI:	23	20%
45% AMI:	80	70%

Unit Mix

25	1-Bedroom Units
59	2-Bedroom Units
33	3-Bedroom Units
117	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
3	1 Bedroom	15%	$518
6	2 Bedrooms	15%	$622
3	3 Bedrooms	15%	$718
5	1 Bedroom	25%	$863
12	2 Bedrooms	25%	$1,036
6	3 Bedrooms	25%	$1,197
16	1 Bedroom	45%	$1,555
40	2 Bedrooms	45%	$1,866
24	3 Bedrooms	45%	$2,156
1	1 Bedroom	Manager’s Unit	$0
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$31,122,193
Construction Costs	$0
Rehabilitation Costs	$10,902,564
Construction Hard Cost Contingency	$2,359,194
Soft Cost Contingency	$300,000
Relocation	$500,000
Architectural/Engineering	$952,549
Const. Interest, Perm. Financing	$2,851,571
Legal Fees	$360,000
Reserves	$962,557
Other Costs	$616,228
Developer Fee	$2,500,000
Commercial Costs	$0
Total	**$53,426,856**

Residential

Construction Cost Per Square Foot:	$85
Per Unit Cost:	$456,640
Estimated Hard Per Unit Cost:	$77,727
True Cash Per Unit Cost*:	$452,366
Bond Allocation Per Unit:	$187,179
Bond Allocation Per Restricted Rental Unit:	$190,435

Construction Financing

Source	Amount
SVP[1]: Tax-Exempt	$21,900,000
SVP[1]: Recycled Tax-Exempt	$4,300,000
HCD: MHP	$14,689,740
County of Santa Clara	$883,167
City of San Jose	$10,117,550
OFNC[2]	$500,000
Deferred Developer Fee	$181,951
Tax Credit Equity	$854,448

Permanent Financing

Source	Amount
Fannie Mae	$8,767,000
HCD: MHP	$14,689,740
County of Santa Clara	$883,167
City of San Jose	$10,117,550
OFNC[2]	$500,000
Net Operating Income	$700,100
Acquired Reserves	$180,339
Deferred Developer Fee	$500,000
Tax Credit Equity	$17,088,960
TOTAL	**$53,426,856**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Silicone Valley Bank
[2]Opportunity Fund Northern California

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$17,726,082
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$21,463,050
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$23,043,907
Qualified Basis (Acquisition):	$21,463,050
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$921,756
Maximum Annual Federal Credit, Acquisition:	$858,522
Total Maximum Annual Federal Credit:	$1,780,278
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,500,000
Federal Tax Credit Factor:	$0.95990

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event
Prior to closing, the applicant or its assignee shall obtain CTCAC's consent to assign and assume the existing Regulatory Agreement (CA-05-915). To be eligible for a new award of tax credits, the owner must provide documentation with the Form 8609 request (the placed in service submission) that the acquisition date and the placed in service date both occurred after the existing federal 15 year compliance period was completed. For resyndications that were originally rehabilitation and acquisition, the resyndication acquisition date cannot occur before the last rehabilitation credit year of the original credit period.

As required by the IRS, the newly resyndicated project will continue to use the originally assigned Building Identification Numbers (BINs).

The newly resyndicated project shall continue to meet the rents and income targeting levels in the existing regulatory agreement(s) and any deeper targeting levels in the new regulatory agreement(s) for the duration of the new regulatory agreement(s).

Existing households determined to be income-qualified for purposes of IRC §42 credit during the 15-year compliance period are concurrently income-qualified households for purposes of the extended use agreement. As a result, any household determined to be income qualified at the time of move-in under the existing regulatory agreement (CA-05-915) is a qualified low-income household for the subsequent allocation (existing household eligibility is “grandfathered”)

The project is a resyndication where the existing regulatory agreement requires service amenities. The project shall provide a similar or greater level of services for a period of at least 15 years under the new regulatory agreement. The project is deemed to have met this requirement based on CTCAC staff’s review of the commitment in the application. The services documented in the placed in service package will be reviewed by CTCAC staff for compliance with this requirement at the time of the placed in service submission.

The project is a re-syndication occurring concurrently with a Transfer Event without distribution of Net Project Equity, and thus is waived from setting aside a Short Term Work Capitalized Replacement Reserve that is otherwise required.

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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 260.798%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Downtown Library Mixed Use Project, located at 119 Lincoln Street in Santa Cruz on a 1.54 acre site, requested and is being recommended for a reservation of $5,113,870 in annual federal tax credits and $55,616,938 of tax-exempt bond cap to finance the new construction of 124 units of housing, consisting of 123 restricted rental units and 1 unrestricted manager's unit. The project will have 11 studio units, 50 one-bedroom units, 32 two-bedroom units, and 31 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in November 2027. The project will be developed by For the Future Housing, Inc. and will be located in Senate District 17 and Assembly District 28.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number	CA-24-628
Project Name	Downtown Library Mixed Use Project
Site Address:	119 Lincoln Street Santa Cruz, CA 95060
County:	Santa Cruz
Census Tract:	1010.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,113,870	$0
Recommended:	$5,113,870	$0

Tax-Exempt Bond Allocation

Recommended:	$55,616,938

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	DTLMU 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:	JPMorgan Chase Bank, NA

Development Team

General Partner(s) or Principal Owner(s):	Eden DTLMU, LLC FTF DTLMU, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	For the Future Housing, Inc.
Developer:	For the Future Housing, Inc.
Investor/Consultant:	California Housing Partnership
Management Agent:	Eden Housing Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	124	
No. / % of Low Income Units:	123	100.00%
Average Targeted Affordability:	49.02%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax Exempt / HOME / Affordable Housing Trust Fund (AHTF) / Local Housing Trust Fund (LHTF) / HUD Section 8 Project-Based Vouchers (31 Units - 25%)	

Information

Housing Type:	Large Family
Geographic Area:	Central Coast Region
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Dianne Myers

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	19	15%
40% AMI:	19	15%
50% AMI:	40	33%
60% AMI:	45	37%

Unit Mix

11	SRO/Studio Units
50	1-Bedroom Units
32	2-Bedroom Units
31	3-Bedroom Units
124	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
1	SRO/Studio	30%	$951
1	SRO/Studio	40%	$1,268
4	SRO/Studio	50%	$1,585
5	SRO/Studio	60%	$1,902
8	1 Bedroom	30%	$1,018
3	1 Bedroom	40%	$1,358
7	1 Bedroom	40%	$1,358
16	1 Bedroom	50%	$1,698
16	1 Bedroom	60%	$2,037
5	2 Bedrooms	30%	$1,222
1	2 Bedrooms	40%	$1,630
3	2 Bedrooms	40%	$1,630
10	2 Bedrooms	50%	$2,037
12	2 Bedrooms	60%	$2,445
5	3 Bedrooms	30%	$1,412
1	3 Bedrooms	40%	$1,883
3	3 Bedrooms	40%	$1,883
10	3 Bedrooms	50%	$2,354
12	3 Bedrooms	60%	$2,825
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,576,694
Construction Costs	$65,783,770
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,786,561
Soft Cost Contingency	$509,409
Relocation	$0
Architectural/Engineering	$2,220,000
Const. Interest, Perm. Financing	$16,917,660
Legal Fees	$190,000
Reserves	$966,017
Other Costs	$4,954,832
Developer Fee	$12,827,432
Commercial Costs	$0
Total	**$110,732,375**

Residential

Construction Cost Per Square Foot:	$518
Per Unit Cost:	$893,003
Estimated Hard Per Unit Cost:	$479,085
True Cash Per Unit Cost*:	$809,717
Bond Allocation Per Unit:	$448,524
Bond Allocation Per Restricted Rental Unit:	$452,170

Construction Financing

Source	Amount
Chase Bank: Tax-Exempt	$55,616,938
Chase Bank: Taxable	$30,420,259
City of Santa Cruz: AHTF	$1,750,000
City of Santa Cruz: LHTF	$3,805,000
City of Santa Cruz: HOME	$1,700,621
Deferred Cost	$2,557,817
Deferred Developer Fee	$10,327,432
Tax Credit Equity	$4,554,308

Permanent Financing

Source	Amount
Chase Bank: Tax-Exempt	$22,596,000
City of Santa Cruz: AHTF	$1,750,000
City of Santa Cruz: LHTF	$3,805,000
City of Santa Cruz: HOME	$1,700,621
HCD: AHSC	$22,500,000
Sponsor Loan: CCCE[1]	$240,000
Deferred Developer Fee	$10,327,432
Tax Credit Equity	$47,813,322
TOTAL	**$110,732,375**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Central Coast Community Energy Grant

Determination of Credit Amount(s)

Requested Eligible Basis:	$98,343,649
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$127,846,744
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,113,870
Approved Developer Fee (in Project Cost & Eligible Basis):	$12,827,432
Federal Tax Credit Factor:	$0.93497

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:
The project is currently made up of 3 parcels. Prior to building permit issuance, a lot merger or lot line adjustment will be recorded to create a single parcel. The legal description and APN must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 151.501%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Montecito Village, located at 1464 Montecito Road in Ramona on a 4.53 acre site, requested and is being recommended for a reservation of $1,122,327 in annual federal tax credits and $15,250,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 70 units of housing, consisting of 69 restricted rental units and 1 unrestricted manager's unit. The project has 16 one-bedroom units, 24 two-bedroom units, 22 three-bedroom units, and 8 four-bedroom units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in March 2025 and be completed in October 2025. The project will be developed by SP Tax Credit Developer II LLC and is located in Senate District 40 and Assembly District 75.

Montecito Village is a re-syndication of an existing Low Income Housing Tax Credit (LIHTC) project, Montecito Village (CA-2008-922). See Resyndication and Resyndication Transfer Event below for additional information. The project will be receiving rental assistance in the form of HUD Section 8 Project-based Contract.

Project Number	CA-24-630
Project Name	Montecito Village
Site Address:	1464 Montecito Road Ramona, CA 92065
County:	San Diego
Census Tract:	208.06

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,122,327	$0
Recommended:	$1,122,327	$0

Tax-Exempt Bond Allocation

Recommended:	$15,250,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Ramona Preservation LP
Contact:	Chase Olson
Address:	701 5th Avenue, Suite 5700 Seattle, WA 98104
Phone:	206-753-0960
Email:	chaseo@secprop.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Public Sale:	Credit Enhanced
Underwriter:	Lument
Credit Enhancement Provider:	Fannie Mae

Development Team

General Partner(s) or Principal Owner(s):	Ramona Preservation GP LLC Las Palmas Housing & Development Corporation
General Partner Type:	Joint Venture
Parent Company(ies):	Security Properties Las Palmas Housing & Development Corporation
Developer:	SP Tax Credit Developer II LLC
Investor/Consultant:	R4 Capital
Management Agent:	The John Stewart Company

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	10	
Total # of Units:	70	
No. / % of Low Income Units:	69	100.00%
Average Targeted Affordability:	53.91%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Contract (69 Units - 100%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	San Diego County
State Ceiling Pool:	Other Rehabilitation
Set Aside:	N/A
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	7	10%
50% AMI:	21	30%
60% AMI:	41	59%

Unit Mix

16	1-Bedroom Units
24	2-Bedroom Units
22	3-Bedroom Units
8	4-Bedroom Units
70	Total Units

Unit Type	& Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
2	1 Bedroom	30%	$852
6	1 Bedroom	50%	$1,420
7	1 Bedroom	60%	$1,704
1	1 Bedroom	60%	$1,704
2	2 Bedrooms	30%	$1,023
6	2 Bedrooms	50%	$1,705
15	2 Bedrooms	60%	$2,046
1	2 Bedrooms	60%	$2,046
2	3 Bedrooms	30%	$1,182
6	3 Bedrooms	50%	$1,970
1	3 Bedrooms	60%	$2,364
12	3 Bedrooms	60%	$2,364
1	4 Bedrooms	30%	$1,318
3	4 Bedrooms	50%	$2,197
1	4 Bedrooms	60%	$2,637
3	4 Bedrooms	60%	$2,637
1	3 Bedrooms	Manager Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$17,250,000
Construction Costs	$0
Rehabilitation Costs	$6,524,000
Construction Hard Cost Contingency	$652,400
Soft Cost Contingency	$35,000
Relocation	$505,000
Architectural/Engineering	$350,000
Const. Interest, Perm. Financing	$875,626
Legal Fees	$187,700
Reserves	$513,184
Other Costs	$589,331
Developer Fee	$2,156,535
Commercial Costs	$0
Total	**$29,638,776**

Residential

Construction Cost Per Square Foot:	$87
Per Unit Cost:	$423,411
Estimated Hard Per Unit Cost:	$80,000
True Cash Per Unit Cost*:	$393,950
Bond Allocation Per Unit:	$217,857
Bond Allocation Per Restricted Rental Unit:	$221,014

Construction Financing

Source	Amount
Lument: Tax-Exempt	$15,250,000
Lument: Taxable	$2,332,935
Seller Carryback	$1,150,000
Seller Credit	$117,065
Deferred Developer Fee	$912,299
Tax Credit Equity	$9,218,568

Permanent Financing

Source	Amount
Lument: Tax-Exempt	$15,250,000
Lument: Taxable	$2,332,935
Seller Carryback	$1,150,000
Seller Credit	$117,065
Deferred Developer Fee	$912,299
Tax Credit Equity	$9,876,477
TOTAL	**$29,638,776**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$9,906,704
130% High Cost Adjustment:	No
Requested Eligible Basis (Acquisition):	$18,151,481
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$9,906,704
Qualified Basis (Acquisition):	$18,151,481
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$396,268
Maximum Annual Federal Credit, Acquisition:	$726,059
Total Maximum Annual Federal Credit:	$1,122,327
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,156,535
Federal Tax Credit Factor:	$0.88000

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: None

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event

Prior to closing, the applicant or its assignee shall obtain CTCAC's consent to assign and assume the existing Regulatory Agreement (CA-08-922). To be eligible for a new award of tax credits, the owner must provide documentation with the Form 8609 request (the placed-in-service submission) that the acquisition date and the placed-in-service date both occurred after the existing federal 15-year compliance period was completed. For resyndications that were originally rehabilitation and acquisition, the resyndication acquisition date cannot occur before the last rehabilitation credit year of the original credit period.

As required by the IRS, the newly resyndicated project will continue to use the originally assigned Building Identification Numbers (BINs).

The newly resyndicated project shall continue to meet the rents and income targeting levels in the existing regulatory agreement(s) and any deeper targeting levels in the new regulatory agreement(s) for the duration of the new regulatory agreement(s). Existing households determined to be income-qualified for purposes of IRC §42 credit during the 15-year compliance period are concurrently income-qualified households for purposes of the extended use agreement. As a result, any household determined to be income qualified at the time of move-in under the existing regulatory agreement (CA-08-922) is a qualified low-income household for the subsequent allocation (existing household eligibility is “grandfathered”).

The project is a resyndication where the existing regulatory agreement requires service amenities. The project shall provide a similar or greater level of services for a period of at least 15 years under the new regulatory agreement. The project is deemed to have met this requirement based on CTCAC staff’s review of the commitment in the application. The services documented in the placed-in-service package will be reviewed by CTCAC staff for compliance with this requirement at the time of the placed-in-service submission.

The project is a re-syndication occurring concurrently with a Transfer Event with distribution of Net Project Equity, which is otherwise required to set aside a Short Term Work Capitalized Reserve in the amount of $117,065. In lieu of a Short Term Work Capitalized Reserve, there is a seller credit of $117,065, allowing the applicant to use Short Term Work Reserve Amount to fund rehabilitation expenses and to receive eligible basis for that amount.

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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 221.108%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Arvin RAD, located at three sites (see below) in Kern County on a total of 12.46 acres, requested and is being recommended for a reservation of $1,815,621 in annual federal tax credits and $22,000,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 114 units of housing, consisting of 107 restricted rental units, 5 market-rate units, and 2 unrestricted manager's units. The project has 38 one-bedroom units, 36 two-bedroom units, 26 three-bedroom units, and 14 four-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Housing Authority of the County of Kern and is located in Senate District 16 and Assembly District 35.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number CA-24-633

Project Name Arvin RAD

Site Addresses:

Site 1: Monta Vista
508 Stockton Avenue
Arvin, CA 93203
County: Kern
Census Tract: 63.04

Site 2: Parkview
901 McElroy Street
Arvin, CA 93203
County: Kern
Census Tract: 63.03

Site 3: Haciendas del Sol
933 Wernli Court
Arvin, CA 93203
County: Kern
Census Tract: 63.03

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,815,621	$0
Recommended:	$1,815,621	$0

Tax-Exempt Bond Allocation
Recommended: $22,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Housing Authority of the County of Kern
Address:	601 24th Street Bakersfield, CA 93301
Phone:	661-631-8500
Email:	spelz@kernha.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Housing Authority of the County of Kern
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	East West Bank

Development Team

General Partner(s) or Principal Owner(s):	Golden Empire Affordable Housing Inc. Housing Authority of the County of Kern
General Partner Type:	Nonprofit
Parent Company(ies):	Golden Empire Affordable Housing Inc. Housing Authority of the County of Kern
Developer:	Housing Authority of the County of Kern
Investor/Consultant:	PNC Bank
Management Agent:	Housing Authority of the County of kern

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	68	
Total # of Units:	114	
No. / % of Low Income Units:	107	95.54%
Average Targeted Affordability:	40.70%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (112 Units - 100%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	Central Valley Region
State Ceiling Pool:	Preservation
Set Aside:	N/A
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	37	35%
50% AMI:	10	9%
60% AMI:	48	45%
80% AMI*:	12	11%

*CTCAC restricted only

Unit Mix

38	1-Bedroom Units
36	2-Bedroom Units
26	3-Bedroom Units
14	4-Bedroom Units
114	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
9	1 Bedroom	30%	$464
3	1 Bedroom	50%	$773
5	1 Bedroom	60%	$773
2	1 Bedroom	50%	$773
14	1 Bedroom	60%	$773
2	1 Bedroom	80%	$773
2	1 Bedroom	80%	$773
5	2 Bedrooms	30%	$557
8	2 Bedrooms	30%	$594
1	2 Bedrooms	50%	$928
11	2 Bedrooms	60%	$928
2	2 Bedrooms	50%	$928
3	2 Bedrooms	60%	$928
2	2 Bedrooms	80%	$928
2	2 Bedrooms	80%	$928
3	3 Bedrooms	30%	$643
1	3 Bedrooms	50%	$1,072
6	3 Bedrooms	60%	$1,072
6	3 Bedrooms	30%	$685
5	3 Bedrooms	60%	$1,072
1	3 Bedrooms	80%	$1,072
2	3 Bedrooms	80%	$1,072
2	4 Bedrooms	30%	$717
1	4 Bedrooms	50%	$1,196
1	4 Bedrooms	60%	$1,196
4	4 Bedrooms	30%	$765
3	4 Bedrooms	60%	$1,196
1	4 Bedrooms	80%	$1,196
1	1 Bedroom	Manager’s Unit	$0
1	2 Bedrooms	Manager’s Unit	$0
1	2 Bedrooms	Market Rate Unit	$948
1	3 Bedrooms	Market Rate Unit	$1,700
1	3 Bedrooms	Market Rate Unit	$1,700
2	4 Bedrooms	Market Rate Unit	$1,972

Project Cost Summary at Application	
Land and Acquisition	$15,390,000
Construction Costs	$0
Rehabilitation Costs	$17,870,000
Construction Hard Cost Contingency	$1,787,000
Soft Cost Contingency	$150,000
Relocation	$285,000
Architectural/Engineering	$569,850
Const. Interest, Perm. Financing	$1,906,500
Legal Fees	$215,000
Reserves	$819,000
Other Costs	$391,148
Developer Fee	$4,030,015
Commercial Costs	$0
Total	**$43,413,513**

Residential

Construction Cost Per Square Foot:	$193
Per Unit Cost:	$380,820
Estimated Hard Per Unit Cost:	$135,965
True Cash Per Unit Cost*:	$230,112
Bond Allocation Per Unit:	$192,982
Bond Allocation Per Restricted Rental Unit:	$222,222

Construction Financing

Source	Amount
East West Bank: Tax-Exempt	$22,000,000
Seller Carryback	$15,390,000
Deferred Costs	$2,936,958
Tax Credit Equity	$3,086,555

Permanent Financing

Source	Amount
East West Bank: Tax-Exempt	$8,600,000
Housing Authority County of Kern	$2,200,000
Seller Carryback	$15,390,000
Deferred Developer Fee	$1,790,736
Tax Credit Equity	$15,432,777
TOTAL	**$43,413,513**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$25,372,945
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$15,130,500
Applicable Fraction:	95.54%
Qualified Basis (Rehabilitation):	$31,512,292
Qualified Basis (Acquisition):	$14,455,031
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$1,237,420
Maximum Annual Federal Credit, Acquisition:	$578,201
Total Maximum Annual Federal Credit:	$1,815,621
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,030,015
Federal Tax Credit Factor:	$0.85000

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

This project is a Rental Assistance Demonstration (RAD) project that is converting 3 existing scattered-site public housing sites into a rehabilitated tax credit project. There are 5 existing households currently in these public housing units that are expected not to qualify as low-income housing tax credit tenants. At placed-in-service, any units not occupied by income-qualified tenants will be not considered tax credit units and the applicable fraction will be adjusted accordingly. However, these units will be rent-restricted at 80% of area median income (AMI) in the recorded CTCAC regulatory agreement in order to meet the scattered-site requirement of Section 42(g)(7) of the Internal Revenue Code. The recorded CTCAC regulatory agreement will also require that upon turnover the units must be occupied by income-qualified tenants.

The applicant requested and has been granted a waiver to Section 10325(f)(7)(J), which requires a manager unit for all sites. The tenants at the Haciendas del Sol site will have equivalent access to management services at the Parkview site, which is no more than 4 miles away.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 129.627%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

JFM Villas Family Apartments, located at 47155 Van Buren Street in Indio on a 5.52 acre site, requested and is being recommended for a reservation of $3,688,281 in annual federal tax credits and $12,499,192 in total state tax credits and $39,835,945 of tax-exempt bond cap to finance the new construction of 100 units of housing, consisting of 99 restricted rental units and 1 unrestricted manager's unit. The project will have 31 one-bedroom units, 34 two-bedroom units, 27 three-bedroom units, and 8 four-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in November 2026. The project will be developed by The Coachella Valley Housing Coalition and will be located in Senate District 18 and Assembly

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Multifamily Housing Program (MHP) and Joe Serna Jr. Farmworker Housing Grant (FWHG) programs of HCD.

Project Number	CA-24-638
Project Name	JFM Villas Family Apartments
Site Address:	47155 Van Buren Street Indio, CA 92201
County:	Riverside
Census Tract:	495.01

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$3,688,281	$12,499,192
Recommended:	$3,688,281	$12,499,192

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation	
Recommended:	$39,835,945

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	The Coachella Valley Housing Coalition
Contact:	Mary Ann Ybarra
Address:	45701 Monroe Street Indio, Ca 92201
Phone:	760-347-3157
Email:	maryann.ybarra@cvhc.org

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Anzel Galvan LLP
Private Placement Purchaser:	Bank of America, N.A.

Development Team

General Partner(s) or Principal Owner(s	JFM Villas Family LLC
General Partner Type:	Nonprofit
Parent Company(ies):	The Coachella Valley Housing Coalition
Developer:	The Coachella Valley Housing Coalition
Investor/Consultant:	Community Economics
Management Agent:	Hyder & Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	100	
No. / % of Low Income Units:	99	100.00%
Average Targeted Affordability:	39.80%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (25 Units - 25%)	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Dianne Myers

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	23	23%
40% AMI:	59	60%
50% AMI:	13	13%
60% AMI:	4	4%

Unit Mix

31	1-Bedroom Units
34	2-Bedroom Units
27	3-Bedroom Units
8	4-Bedroom Units
100	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
6	1 Bedroom	30%	$576
3	1 Bedroom	40%	$769
19	1 Bedroom	40%	$769
2	1 Bedroom	50%	$961
1	1 Bedroom	60%	$1,153
7	2 Bedrooms	30%	$691
5	2 Bedrooms	40%	$922
18	2 Bedrooms	40%	$922
3	2 Bedrooms	50%	$1,152
1	2 Bedrooms	60%	$1,383
3	3 Bedrooms	30%	$799
4	3 Bedrooms	30%	$799
8	3 Bedrooms	40%	$1,066
4	3 Bedrooms	40%	$1,066
3	3 Bedrooms	50%	$1,332
2	3 Bedrooms	50%	$1,332
2	3 Bedrooms	60%	$1,599
1	4 Bedrooms	30%	$891
2	4 Bedrooms	30%	$891
2	4 Bedrooms	40%	$1,189
3	4 Bedrooms	50%	$1,486
1	3 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,212,200
Construction Costs	$52,404,731
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,135,284
Soft Cost Contingency	$200,000
Relocation	$0
Architectural/Engineering	$1,498,000
Const. Interest, Perm. Financing	$8,270,542
Legal Fees	$160,000
Reserves	$749,452
Other Costs	$4,003,394
Developer Fee	$4,500,000
Commercial Costs	$0
Total	**$77,133,603**

Residential

Construction Cost Per Square Foot:	$482
Per Unit Cost:	$771,336
Estimated Hard Per Unit Cost:	$457,613
True Cash Per Unit Cost*:	$728,142
Bond Allocation Per Unit:	$398,359
Bond Allocation Per Restricted Rental Unit:	$402,383

Construction Financing

Source	Amount
BoA[1]: Tax-Exempt	$39,835,945
BoA[1]: Recycled Tax-Exempt	$21,721,146
HCD: FWHG	$6,612,672
Tax Credit Equity	$4,319,388

Permanent Financing

Source	Amount
BoA[1]: Tax-Exempt	$5,029,600
HCD: MHP	$19,142,450
HCD: FWHG	$6,612,672
General Partner Equity	$2,000,000
Deferred Developer Fee	$1,300,000
Tax Credit Equity	$43,048,881
TOTAL	**$77,133,603**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Bank of America

Determination of Credit Amount(s)

Requested Eligible Basis:	$70,928,477
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$92,207,021
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,688,281
Total State Credit:	$12,499,192
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,500,000
Federal Tax Credit Factor:	$0.89607
State Tax Credit Factor:	$0.80000

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
The current legal description is part of a larger site and the project site’s parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-638 must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 87.767%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

JFM Villas Senior Apartments, located at 47135 Van Buren Street in Indio on a 2.58 acre site, requested and is being recommended for a reservation of $1,838,213 in annual federal tax credits and $6,550,729 in total state tax credits and $19,846,311 of tax-exempt bond cap to finance the new construction of 50 units of housing, consisting of 49 restricted rental units and 1 unrestricted manager's unit. The project will have 16 studio units, 24 one-bedroom units, and 10 two-bedroom units, serving seniors with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in November 2026. The project will be developed by Coachella Valley Housing Coalition and will be located in Senate District 18 and Assembly District 56.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Contract. The project financing includes state funding from the Multifamily Housing Program (MHP) and the Joe Serna, Jr. Farmworker Housing Grant (FWHG) programs of HCD.

Project Number	CA-24-639
Project Name	JFM Villas Senior Apartments
Site Address:	47135 Van Buren Street Indio, CA 92201
County:	Riverside
Census Tract:	495.01

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$1,838,213	$6,550,729
Recommended:	$1,838,213	$6,550,729

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$19,846,311

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	The Coachella Valley Housing Coalition
Contact:	Mary Ann Ybarra
Address:	45701 Monroe Street, Suite G Indio, CA 92201
Phone:	(760) 347-3157
Email:	maryann.ybarra@cvhc.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Anzel Galvan LLP
Private Placement Purchaser:	Bank of America, N.A.

Development Team

General Partner(s) or Principal Owner(s):	JFM Villas LLC
General Partner Type:	Nonprofit
Parent Company(ies):	The Coachella Valley Housing Coalition
Developer:	Coachella Valley Housing Coalition
Investor/Consultant:	Community Economics, Inc.
Management Agent:	Hyder & Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	50	
No. / % of Low Income Units:	49	100.00%
Average Targeted Affordability:	39.39%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (25 Units - 50%)	

Information

Housing Type:	Seniors
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	17	35%
40% AMI:	19	39%
50% AMI:	12	24%
60% AMI:	1	2%

Unit Mix

16	SRO/Studio Units
24	1-Bedroom Units
10	2-Bedroom Units
50	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
3	SRO/Studio	30%	$538
2	SRO/Studio	30%	$538
2	SRO/Studio	40%	$718
4	SRO/Studio	40%	$718
4	SRO/Studio	50%	$897
1	SRO/Studio	50%	$897
7	1 Bedroom	30%	$576
2	1 Bedroom	30%	$576
2	1 Bedroom	40%	$769
8	1 Bedroom	40%	$769
4	1 Bedroom	50%	$961
1	1 Bedroom	60%	$1,153
1	2 Bedrooms	30%	$691
2	2 Bedrooms	30%	$691
1	2 Bedrooms	40%	$922
2	2 Bedrooms	40%	$922
1	2 Bedrooms	50%	$1,152
2	2 Bedrooms	50%	$1,152
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,065,000
Construction Costs	$24,071,045
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,435,863
Soft Cost Contingency	$300,000
Relocation	$0
Architectural/Engineering	$1,405,840
Const. Interest, Perm. Financing	$4,051,871
Legal Fees	$170,000
Reserves	$425,396
Other Costs	$2,172,792
Developer Fee	$3,500,000
Commercial Costs	$0
Total	**$38,597,807**

Residential

Construction Cost Per Square Foot:	$617
Per Unit Cost:	$771,956
Estimated Hard Per Unit Cost:	$417,271
True Cash Per Unit Cost*:	$745,956
Bond Allocation Per Unit:	$396,926
Bond Allocation Per Restricted Rental Unit:	$405,027

Construction Financing

Source	Amount
Bank of America: Tax-Exempt	$19,846,311
Bank of America: Taxable	$10,673,877
HCD: FWHG	$2,698,773
Tax Credit Equity	$2,178,450

Permanent Financing

Source	Amount
Bank of America: Tax-Exempt	$2,222,900
HCD: MHP	$9,736,634
HCD: FWHG	$2,698,773
Deferred Developer Fee	$1,300,000
General Partner Equity	$1,000,000
Tax Credit Equity	$21,639,500
TOTAL	**$38,597,807**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$35,350,249
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$45,955,323
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,838,213
Total State Credit:	$6,550,729
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,500,000
Federal Tax Credit Factor:	$0.89211
State Tax Credit Factor:	$0.80000

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 $745,956. The applicant noted that the per unit cost is attributed to inflation, prevailing wage costs, high cost of multiple key materials, holding cost, and construction cost.

The current legal description is part of a larger site and the project site’s parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-639 must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 65.753%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Saggio Hills Phase I, located at 450 Parkland Farms Boulevard in Healdsburg on a 2.28 acre site, requested and is being recommended for a reservation of $1,862,084 in annual federal tax credits and $19,650,000 of tax-exempt bond cap to finance the new construction of 48 units of housing, consisting of 47 restricted rental units and 1 unrestricted manager's unit. The project will have 6 studio units, 18 one-bedroom units, 12 two-bedroom units, and 12 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in October 2026. The project will be developed by Freebird Development Company, LLC / Jamboree Housing Corporation and will be located in Senate District 2 and Assembly District 2.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number CA-24-644

Project Name Saggio Hills Phase I
Site Address: 450 Parkland Farms Boulevard
Healdsburg, CA 95448
County: Sonoma
Census Tract: 1539.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,862,084	$0
Recommended:	$1,862,084	$0

Tax-Exempt Bond Allocation
Recommended: $19,650,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Saggio Hills Lot 14, L.P.
Contact: Robin Zimbler
Address: 1111 Broadway, Suite 300
Oakland, CA 94607
Phone: (510) 319-6959
Email: robin@freebirddev.com

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

Development Team

General Partner(s) or Principal Owner(s):	Freebird Saggio Hills Lot 14 LLC JHC-Saggio Hills Lot 14 LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Freebird Development Company, LLC Jamboree Housing Corporation
Developer:	Freebird Development Company, LLC / Jamboree Housing Corporation
Investor/Consultant:	Red Stone Equity Partners, LLC
Management Agent:	John Stewart Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	48	
No. / % of Low Income Units:	47	100.00%
Average Targeted Affordability:	49.57%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	Northern Region
State Ceiling Pool:	N/A
Set Aside:	N/A
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	12	26%
50% AMI:	13	28%
60% AMI:	22	47%

Unit Mix

6	SRO/Studio Units
18	1-Bedroom Units
12	2-Bedroom Units
12	3-Bedroom Units
48	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
6	SRO/Studio	30%	$726
6	1 Bedroom	30%	$778
11	1 Bedroom	60%	$1,557
2	2 Bedrooms	50%	$1,556
10	2 Bedrooms	60%	$1,867
11	3 Bedrooms	50%	$1,798
1	3 Bedrooms	60%	$2,157
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,151,171
Construction Costs	$25,327,390
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,318,928
Soft Cost Contingency	$350,000
Relocation	$0
Architectural/Engineering	$1,462,174
Const. Interest, Perm. Financing	$3,473,273
Legal Fees	$245,000
Reserves	$177,738
Other Costs	$1,634,400
Developer Fee	$2,500,000
Commercial Costs	$0
Total	**$37,640,074**

Residential	
Construction Cost Per Square Foot:	$423
Per Unit Cost:	$784,168
Estimated Hard Per Unit Cost:	$453,141
True Cash Per Unit Cost*:	$784,168
Bond Allocation Per Unit:	$409,375
Bond Allocation Per Restricted Rental Unit:	$418,085

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$19,650,000
Citibank: Taxable	$11,985,274
City of Healdsburg	$1,151,170
Deferred Costs	$177,738
Deferred Developer Fee	$1,250,000
Tax Credit Equity	$3,425,892

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$3,623,293
HCD: AHSC	$13,742,098
Sponsor Loan: AHSC	$1,994,053
City of Healdsburg	$1,151,170
Tax Credit Equity	$17,129,460
TOTAL	**$37,640,074**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$35,809,310
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$46,552,103
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,862,084
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,500,000
Federal Tax Credit Factor:	$0.91991

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 $857,829. The applicant noted that the per unit cost is attributed to increasing construction costs, high interest rates, prevailing wage requirements, new state energy code requirements, the separate community building, and public improvements required as a condition of the disposition and development agreement.

The proposed rent does not include a utility allowance. The owner will pay for all utilities.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 83.288%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The Grant at Mission Trails, located at 5945 Mission Gorge Road in San Diego on a 0.4 acre site, requested and is being recommended for a reservation of $1,612,900 in annual federal tax credits and $8,617,124 in total state tax credits and $16,993,197 of tax-exempt bond cap to finance the new construction of 48 units of housing, consisting of 47 restricted rental units and 1 unrestricted manager's unit. The project will have 12 one-bedroom units, 24 two-bedroom units, and 12 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in January 2027. The project will be developed by CRP Affordable Housing & Community Development LLC and will be located in Senate District 39 and Assembly District 78.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-647
Project Name	The Grant at Mission Trails
Site Address:	5945 Mission Gorge Road San Diego, CA 92120
County:	San Diego
Census Tract:	96.04

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$1,612,900	$8,617,124
Recommended:	$1,612,900	$8,617,124

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$16,993,197

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	The Grant at Mission Trails LP
Applicant for State Credits:	Pacific Southwest Community Development Corporation
Contact:	Paul Salib
Address:	122 East 42nd Street Suite 1903 New York, NY 10168
Phone:	212-776-1619
Email:	psalib@crpaffordable.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	PSCDC The Grant LLC The Grant at Mission Trails AGP LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Pacific Southwest Community Development Corporation CRP Affordable Housing & Community Development
Developer:	CRP Affordable Housing & Community Development LLC
Investor/Consultant:	RBC Capital Markets
Management Agent:	Hyder & Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	48	
No. / % of Low Income Units:	47	100.00%
Average Targeted Affordability:	45.74%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD-VASH Section 8 Project-based Vouchers (12 Units - 26%) / Community Development Block Grant (CDBG) / American Rescue Plan Act (ARPA)	

Information

Housing Type:	Large Family
Geographic Area:	San Diego County
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	14
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	17	36%
40% AMI:	4	9%
50% AMI:	8	17%
60% AMI:	18	38%

Unit Mix

12	1-Bedroom Units
24	2-Bedroom Units
12	3-Bedroom Units
48	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
12	1 Bedroom	30%	$852
12	2 Bedrooms	60%	$2,046
4	2 Bedrooms	50%	$1,705
4	2 Bedrooms	40%	$1,364
3	2 Bedrooms	30%	$1,023
6	3 Bedrooms	60%	$2,364
4	3 Bedrooms	50%	$1,970
2	3 Bedrooms	30%	$1,182
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$3,300,000
Construction Costs	$19,719,823
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,025,000
Soft Cost Contingency	$292,338
Relocation	$0
Architectural/Engineering	$1,470,000
Const. Interest, Perm. Financing	$2,529,008
Legal Fees	$352,500
Reserves	$312,758
Other Costs	$2,371,386
Developer Fee	$4,045,735
Commercial Costs	$0
Total	**$35,418,548**

Residential	
Construction Cost Per Square Foot:	$375
Per Unit Cost:	$737,886
Estimated Hard Per Unit Cost:	$355,439
True Cash Per Unit Cost*:	$705,684
Bond Allocation Per Unit:	$354,025
Bond Allocation Per Restricted Rental Unit:	$361,557

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$16,993,197
Citibank: Taxable	$1,809,339
County of San Diego: ARPA	$2,750,000
City of San Diego: CDBG	$2,500,000
SDHC[1]	$2,200,000
Deferred Costs	$3,883,495
Tax Credit Equity	$5,282,518

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$5,292,738
County of San Diego: ARPA	$2,750,000
City of San Diego: CDBG	$2,500,000
SDHC[1]	$2,200,000
Deferred Developer Fee	$1,545,735
Tax Credit Equity	$21,130,075
TOTAL	**$35,418,548**

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

[1] San Diego Housing Commission

Determination of Credit Amount(s)

Requested Eligible Basis:	$31,017,308
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$40,322,500
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,612,900
Total State Credit:	$8,617,124
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,045,735
Federal Tax Credit Factor:	$0.83992
State Tax Credit Factor:	$0.88000

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 cost of $705,684. The applicant noted that the per unit cost is attributed to increased costs associated with building in a DDA, complex design requirements, prevailing wage costs, and supply chain issues.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 96.768%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Seventh Street Village, located at 7th Street & J Street in Modesto on a 0.88 acre site, requested and is being recommended for a reservation of $3,484,875 in annual federal tax credits and $37,517,305 of tax-exempt bond cap to finance the new construction of 79 units of housing, consisting of 77 restricted rental units and 2 unrestricted manager's units. The project will have 12 one-bedroom units, 35 two-bedroom units, and 32 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in March 2027. The project will be developed by Visionary Home Builders of CA, Inc. and will be located in Senate District 4 and Assembly District 22.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) and Permanent Local Housing Allocation (PLHA) programs of HCD.

Project Number	CA-24-648
Project Name	Seventh Street Village
Site Address:	7th Street & J Street Modesto, CA 95354
County:	Stanislaus
Census Tract:	17.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,484,875	$0
Recommended:	$3,484,875	$0

Tax-Exempt Bond Allocation

Recommended:	$37,517,305

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Visionary Home Builders of California, Inc.
Contact:	Carol J. Ornelas
Address:	315 North San Joaquin Street Stockton, CA 95202
Phone:	209-466-6811
Email:	dev@visionaryhomebuilders.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Banner Bank

Development Team

General Partners / Principal Owners:	VHB Seventh Street Village LLC
General Partner Type:	Nonprofit
Parent Company:	Visionary Home Builders of California, Inc.
Developer:	Visionary Home Builders of CA, Inc.
Investor/Consultant:	California Housing Partnership
Management Agent:	VPMG

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	79	
No. / % of Low Income Units:	77	100.00%
Average Targeted Affordability:	48.33%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HOME/ HUD Section 8 Project-based Vouchers (30 Units - 39%) / Community Development Block Grant (CDBG)	

Information

Housing Type:	Large Family
Geographic Area:	Central Valley Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	of Affordable Units
30% AMI:	20	26%
40% AMI:	17	22%
50% AMI:	16	21%
60% AMI:	13	17%
80% AMI*:	11	14%

*CTCAC restricted only

Unit Mix

12 1-Bedroom Units
35 2-Bedroom Units
32 3-Bedroom Units
79 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
7	1 Bedroom	30%	$512
7	2 Bedrooms	30%	$615
6	3 Bedrooms	30%	$710
2	1 Bedroom	40%	$683
8	2 Bedrooms	40%	$820
7	3 Bedrooms	40%	$947
1	1 Bedroom	50%	$854
7	2 Bedrooms	50%	$1,025
8	3 Bedrooms	50%	$1,184
1	1 Bedroom	60%	$1,025
6	2 Bedrooms	60%	$1,230
6	3 Bedrooms	60%	$1,421
1	1 Bedroom	80%	$1,367
6	2 Bedrooms	80%	$1,577
4	3 Bedrooms	80%	$1,895
1	2 Bedrooms	Manager’s Unit	$0
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$3,188,806
Construction Costs	$44,942,600
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,355,000
Soft Cost Contingency	$267,143
Relocation	$0
Architectural/Engineering	$1,509,079
Const. Interest, Perm. Financing	$7,067,115
Legal Fees	$245,000
Reserves	$279,459
Other Costs	$3,260,876
Developer Fee	$8,741,325
Commercial Costs	$0
Total	**$71,856,403**

Residential

Construction Cost Per Square Foot:	$273
Per Unit Cost:	$909,575
Estimated Hard Per Unit Cost:	$501,456
True Cash Per Unit Cost*:	$830,571
Bond Allocation Per Unit:	$474,903
Bond Allocation Per Restricted Rental Unit:	$568,444

Construction Financing

Source	Amount
Banner Bank: Tax-Exempt	$37,517,305
Banner Bank: Taxable	$13,948,823
City of Modesto: CDBG	$1,852,631
City of Modesto: HOME	$3,509,216
City of Modesto: PLHA	$1,490,784
HCD: AHSC	$1,300,000
Deferred Costs	$2,966,109
Deferred Developer Fee	$6,241,325
General Partner Equity	$100
Tax Credit Equity	$3,030,110

Permanent Financing

Source	Amount
Banner Bank: Tax-Exempt	$7,312,000
City of Modesto: CDBG	$1,852,631
City of Modesto: HOME	$3,509,216
City of Modesto: PLHA	$1,490,784
HCD: AHSC	$16,000,000
HCD: AHSC: HRI[1]	$1,300,000
RAZA Development Fund	$987,000
Deferred Costs	$967,750
Deferred Developer Fee	$6,241,325
General Partner Equity	$100
Tax Credit Equity	$32,195,597
TOTAL	**$71,856,403**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Housing-Related Infrastructure

Determination of Credit Amount(s)

Requested Eligible Basis:	$67,016,825
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$87,121,873
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,484,875
Approved Developer Fee (in Project Cost & Eligible Basis):	$8,741,325
Federal Tax Credit Factor:	$0.92387

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 $830,571. The applicant noted that the per unit cost is attributed to the double concrete podium style foundation, fire suppression systems, the utilization of a material hoistway and cranes during construction, prevailing wages, security, as well as solar, battery and other electric code requirements.

The project anticipates receiving HUD Section 8 project-based vouchers with a 15-year term for 30 of the 79 tax-credit units.

Projects with funding and subsidies from HUD are required to use Utility Allowances (UAs) approved by HUD. The applicant’s request to use the CUAC for Seventh Street Village (CA-24-648) is subject to approval by HUD.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	0
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	109

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: 72.550%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Civic Crossing (699 Ygnacio Valley Road), located at 699 Ygnacio Valley Road in Walnut Creek on a 0.86 acre site, requested and is being recommended for a reservation of $3,884,742 in annual federal tax credits and $46,881,118 of tax-exempt bond cap to finance the new construction of 93 units of housing, consisting of 92 restricted rental units and 1 unrestricted manager's unit. The project will have 24 studio units, 21 one-bedroom units, 24 two-bedroom units, and 24 three-bedroom units, serving families with rents affordable to households earning 20%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in February 2027. The project will be developed by Resources for Community Development and will be located in Senate District 7 and Assembly District 16.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH), Affordable Housing and Sustainable Communities (AHSC), and Local Housing Trust Fund (LHTF) programs of HCD.

Project Number	CA-24-649

Project Name	Civic Crossing (699 Ygnacio Valley Road)
Site Address:	699 Ygnacio Valley Road Walnut Creek, CA 94596
County:	Contra Costa
Census Tract:	3390.03

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,884,742	$0
Recommended:	$3,884,742	$0

Tax-Exempt Bond Allocation

Recommended:	$46,881,118

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	YVR, L.P.
Contact:	Norma Guzman
Address:	2220 Oxford Street Berkeley, CA 94704
Phone:	510-841-4410
Email:	nguzman@rcdhousing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Chase Bank

Development Team

General Partner(s) or Principal Owner(s):	RCD GP LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Resources for Community Development
Developer:	Resources for Community Development
Investor/Consultant:	Community Economics
Management Agent:	The John Stewart Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	93	
No. / % of Low Income Units:	92	100.00%
Average Targeted Affordability:	41.53%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME / HUD Section 8 Project-based Vouchers (24 Units - 26%)	

Information

Housing Type:	Large Family
Geographic Area:	East Bay Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	30
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	36	39%
50% AMI:	32	35%
60% AMI:	24	26%

Unit Mix

24	SRO/Studio Units
21	1-Bedroom Units
24	2-Bedroom Units
24	3-Bedroom Units
93	Total Units

Unit Type	& Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
16	SRO/Studio	20%	$545
8	SRO/Studio	20%	$545
5	1 Bedroom	20%	$584
1	1 Bedroom	20%	$584
7	1 Bedroom	50%	$1,460
8	1 Bedroom	60%	$1,752
2	2 Bedrooms	30%	$1,051
1	2 Bedrooms	30%	$1,051
9	2 Bedrooms	50%	$1,752
11	2 Bedrooms	60%	$2,103
1	3 Bedrooms	30%	$1,214
2	3 Bedrooms	30%	$1,214
16	3 Bedrooms	50%	$2,024
5	3 Bedrooms	60%	$2,429
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$9,306,567
Construction Costs	$52,098,375
Construction Hard Cost Contingency	$3,880,142
Soft Cost Contingency	$589,140
Architectural/Engineering	$2,854,254
Const. Interest, Perm. Financing	$9,824,643
Legal Fees	$138,190
Reserves	$1,395,151
Other Costs	$5,035,933
Developer Fee	$3,500,000
Commercial Costs	$1,808,872
Total	**$90,431,267**

Residential

Construction Cost Per Square Foot:	$825
Per Unit Cost:	$950,011
Estimated Hard Per Unit Cost:	$508,032
True Cash Per Unit Cost*:	$936,356
Bond Allocation Per Unit:	$504,098
Bond Allocation Per Restricted Rental Unit:	$509,577

Construction Financing

Source	Amount
Chase Bank: Tax-Exempt	$46,881,118
Chase Bank: Taxable	$14,584,359
County of Contra Costa: HOME	$6,833,819
City of Walnut Creek	$10,500,000
HCD: AHSC	$3,889,406
General Partner Equity	$100
Tax Credit Equity	$3,659,814

Permanent Financing

Source	Amount
Chase Bank: Tax-Exempt	$1,209,000
County of Contra Costa: HOME	$6,833,819
HCD: NPLH	$9,414,110
HCD: AHSC	$20,904,291
Sponsor Loan: AHSC	$3,889,406
City of Walnut Creek	$10,500,000
Deferred Developer Fee	$1,299,900
General Partner Equity	$100
Tax Credit Equity	$36,380,641
TOTAL	**$90,431,267**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$74,706,577
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$97,118,550
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,884,742
Approved Developer Fee in Project Cost:	$3,500,000
Approved Developer Fee in Eligible Basis:	$3,228,669
Federal Tax Credit Factor:	$0.93650

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 cost of $936,356. The applicant noted that the per unit cost is attributed to high land costs and interest rates, prevailing wage and reserve requirements, inclusion of solar energy, and required utilities, evironmental mitigation, and off-site costs.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: None.

Standard Conditions
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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 89.304%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The Crawford, located at 1130 Harvey Way in Roseville on a 10.88 acre site, requested and is being recommended for a reservation of $5,664,712 in annual federal tax credits and $59,000,000 of tax-exempt bond cap to finance the new construction of 265 units of housing, consisting of 262 restricted rental units and 3 unrestricted manager's units. The project will have 66 one-bedroom units, 132 two-bedroom units, and 67 three-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in December 2024 and be completed in April 2027. The project will be developed by USA Multi-Family Development, Inc. and will be located in Senate District 6 and Assembly District 5.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number CA-24-652

Project Name The Crawford
Site Address: 1130 Harvey Way
Roseville, CA 95747
County: Placer
Census Tract: 213.25

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,664,712	$0
Recommended:	$5,664,712	$0

Tax-Exempt Bond Allocation
Recommended: $59,000,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Roseville Harvey 715, LP.
Contact: Darren Bobrowsky
Address: 3200 Douglas Boulevard, Suite 200
Roseville, CA 95661
Phone: (916) 865-3981
Email: dbobrowsky@usapropfund.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: California Municipal Finance Authority
Bond Counsel: Anzel Galvan LLP
Private Placement Purchaser: Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	USA Roseville Harvey 715, L.P. Riverside Charitable Corporation
General Partner Type:	Joint Venture
Parent Company(ies):	USA Properties Fund, Inc. Riverside Charitable Corporation
Developer:	USA Multi-Family Development, Inc.
Investor/Consultant:	WNC
Management Agent:	USA Multifamily Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	11	
Total # of Units:	265	
No. / % of Low Income Units:	262	100.00%
Average Targeted Affordability:	59.99%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (8 Units - 3%)	

Information

Housing Type:	Large Family
Geographic Area:	Capital Region
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Franklin Cui

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	27	10%
50% AMI:	64	24%
60% AMI:	26	10%
70% AMI*:	145	55%

*CTCAC restricted only

Unit Mix

66	1-Bedroom Units
132	2-Bedroom Units
67	3-Bedroom Units
265	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
2	1 Bedroom	30%	$663
4	1 Bedroom	30%	$663
16	1 Bedroom	50%	$1,105
7	1 Bedroom	60%	$1,326
37	1 Bedroom	70%	$1,547
4	2 Bedrooms	30%	$795
3	2 Bedrooms	30%	$795
16	2 Bedrooms	50%	$1,326
7	2 Bedrooms	60%	$1,591
35	2 Bedrooms	70%	$1,856
7	2 Bedrooms	30%	$795
16	2 Bedrooms	50%	$1,326
6	2 Bedrooms	60%	$1,591
36	2 Bedrooms	70%	$1,856
2	3 Bedrooms	30%	$919
5	3 Bedrooms	30%	$919
16	3 Bedrooms	50%	$1,532
6	3 Bedrooms	60%	$1,839
37	3 Bedrooms	70%	$2,145
2	2 Bedrooms	Manager’s Unit	$0
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$288,534
Construction Costs	$63,705,731
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$6,207,646
Soft Cost Contingency	$865,206
Relocation	$0
Architectural/Engineering	$2,583,459
Const. Interest, Perm. Financing	$12,312,415
Legal Fees	$100,000
Reserves	$1,155,921
Other Costs	$14,267,743
Developer Fee	$14,209,145
Commercial Costs	$0
Total	**$115,695,800**

Residential	
Construction Cost Per Square Foot:	$300
Per Unit Cost:	$436,588
Estimated Hard Per Unit Cost:	$203,904
True Cash Per Unit Cost*:	$394,456
Bond Allocation Per Unit:	$222,642
Bond Allocation Per Restricted Rental Unit:	$504,274

Construction Financing	
Source	Amount
Citi: Tax-Exempt	$59,000,000
Citi: Taxable	$6,100,000
Recycled Tax-Exempt	$3,000,000
Safehold: Ground Lease	$18,599,900
Net Operating Income	$395,977
Deferred Costs	$15,548,466
Tax Credit Equity	$7,991,920

Permanent Financing	
Source	Amount
Citi	$29,885,000
Safehold: Ground Lease	$18,599,900
Net Operating Income	$2,766,561
Deferred Developer Fee	$11,164,870
Solar Tax Credit Equity	$602,916
Tax Credit Equity	$52,676,553
TOTAL	**$115,695,800**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$108,936,779
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$141,617,813
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,664,712
Approved Developer Fee (in Project Cost & Eligible Basis):	$14,209,145
Federal Tax Credit Factor:	$0.92991

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 97.597%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 850 Turk Street, located at 850 Turk Street in San Francisco on a 0.43 acre site, requested and is being recommended for a reservation of $4,567,466 in annual federal tax credits and $48,478,327 of tax-exempt bond cap to finance the new construction of 92 units of housing, consisting of 91 restricted rental units and 1 unrestricted manager's unit. The project will have 28 studio units, 16 one-bedroom units, 21 two-bedroom units, and 27 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in February 2027. The project will be developed by MidPen Housing Corporation and will be located in Senate District 11 and Assembly District 17.

The project financing includes state funding from the Infill Infrastructure Grant (IIG), Local Government Matching Grant (LGMG), & Affordable Housing and Sustainable Communities (AHSC) programs of HCD.

Project Number CA-24-653

Project Name	850 Turk Street
Site Address:	850 Turk Street San Francisco, CA 94102
County:	San Francisco
Census Tract:	160.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,567,466	$0
Recommended:	$4,567,466	$0

Tax-Exempt Bond Allocation
Recommended: $48,478,327

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	MidPen Housing Corporation
Contact:	Joanna Carman
Address:	303 Vintage Park Drive, Ste. 250 Foster City, CA 94404
Phone:	831-707-2141
Email:	joanna.carman@midpen-housing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Mayor's Office of Housing and Community Development
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Wells Fargo Bank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	MP Turk Street LLC
General Partner Type:	Nonprofit
Parent Company(ies):	MidPen Housing Corporation
Developer:	MidPen Housing Corporation
Investor/Consultant:	California Housing Partnership
Management Agent:	MidPen Property Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	92	
No. / % of Low Income Units:	91	100.00%
Average Targeted Affordability:	42.30%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Francisco County
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	25	27%
40% AMI:	32	35%
50% AMI:	21	23%
60% AMI:	13	14%

Unit Mix

28	SRO/Studio Units
16	1-Bedroom Units
21	2-Bedroom Units
27	3-Bedroom Units
92	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
8	SRO/Studio	30%	$1,027
5	1 Bedroom	30%	$1,102
6	2 Bedrooms	30%	$1,322
6	3 Bedrooms	30%	$1,497
12	SRO/Studio	40%	$1,370
5	1 Bedroom	40%	$1,469
6	2 Bedrooms	40%	$1,762
9	3 Bedrooms	40%	$2,036
8	SRO/Studio	50%	$1,713
3	1 Bedroom	50%	$1,836
4	2 Bedrooms	50%	$2,203
6	3 Bedrooms	50%	$2,545
3	1 Bedroom	60%	$2,204
4	2 Bedrooms	60%	$2,644
6	3 Bedrooms	60%	$2,996
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$904,536
Construction Costs	$61,560,217
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,116,913
Soft Cost Contingency	$268,067
Relocation	$0
Architectural/Engineering	$3,113,000
Const. Interest, Perm. Financing	$10,158,114
Legal Fees	$170,000
Reserves	$458,726
Other Costs	$2,991,215
Developer Fee	$11,456,854
Commercial Costs	$0
Total	**$94,197,642**

Residential

Construction Cost Per Square Foot:	$624
Per Unit Cost:	$1,023,887
Estimated Hard Per Unit Cost:	$589,748
True Cash Per Unit Cost*:	$923,269
Bond Allocation Per Unit:	$526,938
Bond Allocation Per Restricted Rental Unit:	$532,729

Construction Financing

Source	Amount
Wells Fargo: Tax-Exempt	$48,478,327
Wells Fargo: Taxable	$13,769,242
HCD: IIG	$1,317,000
HCD: LGMG	$7,760,753
SF MOHCD[1]	$5,000,000
Deferred Costs	$2,328,126
Deferred Developer Fee	$9,256,854
General Partner Equity	$100
Tax Credit Equity	$6,287,240

Permanent Financing

Source	Amount
CCRC[2]	$5,503,000
HCD: AHSC	$22,000,000
HCD: IIG	$1,317,000
HCD: LGMG	$7,760,753
SF MOHCD[1]	$5,000,000
Deferred Developer Fee	$9,256,854
General Partner Equity	$100
Tax Credit Equity	$43,359,935
TOTAL	**$94,197,642**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]San Francisco Mayor's Office of Housing and Community Development
[2]California Community Reinvestment Corporation

Determination of Credit Amount(s)

Requested Eligible Basis:	$87,835,877
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$114,186,640
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,567,466
Approved Developer Fee (in Project Cost & Eligible Basis):	$11,456,854
Federal Tax Credit Factor:	$0.94932

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 $923,269. The applicant noted that the per unit cost is attributed to labor, design, and construction costs in San Francisco; as well as mitigation of substances at the proposed building site and building the foundation system to support a high-rise building.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 150.476%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Alveare Parkview, located at 1405 South Broadway in Los Angeles on a 0.94 acre site, requested and is being recommended for a reservation of $4,958,397 in annual federal tax credits and $52,330,000 of tax-exempt bond cap to finance the new construction of 105 units of housing, consisting of 104 restricted rental units and 1 unrestricted manager's unit. The project will have 6 studio units, 38 one-bedroom units, 31 two-bedroom units, and 30 three-bedroom units, serving families with rents affordable to households earning 20%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in February 2027. The project will be developed by Related Irvine Development Company, LLC and will be located in Senate District 28 and Assembly District 57.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Infill Infrastructure Grant (IIG), Local Government Matching Grant (LGMG), and Affordable Housing and Sustainable Communities (AHSC) programs of HCD.

Project Number	CA-24-654
Project Name	Alveare Parkview
Site Address:	1405 South Broadway Los Angeles, CA 90015
County:	Los Angeles
Census Tract:	2240.10

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,958,397	$0
Recommended:	$4,958,397	$0

Tax-Exempt Bond Allocation

Recommended:	$52,330,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Alveare Parkview Housing Partners, L.P.
Contact:	Frank Cardone
Address:	18201 Von Karman Avenue, Suite 900 Irvine, CA 92612
Phone:	(949) 660-7272
Email:	fcardone@related.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Housing Authority of the City of Los Angeles (HACLA)
Bond Counsel:	Kutak Rock LLP
Private Placement Purchaser:	U.S. Bank, N.A

Development Team

General Partner(s) or Principal Owner(s):	Related/Alveare Parkview Development Co., LLC La Cienega LOMOD, Inc. Weingart Alveare Parkview, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	The Related Companies of California La Cienega LOMOD, Inc. Weingart Alveare Parkview, LLC
Developer:	Related Irvine Development Company, LLC
Investor/Consultant:	U.S. Bancorp Community Development Corporation
Management Agent:	Related Management Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	105	
No. / % of Low Income Units:	104	100.00%
Average Targeted Affordability:	39.80%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Project-based Vouchers (62 Units - 60%)	

Information

Housing Type:	Large Family
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Daisy Andrade
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	44	42%
40% AMI:	18	17%
50% AMI:	20	19%
60% AMI:	22	21%

Unit Mix

6	SRO/Studio Units
38	1-Bedroom Units
31	2-Bedroom Units
30	3-Bedroom Units
105	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
2	SRO/Studio	20%	$485
2	SRO/Studio	30%	$728
2	SRO/Studio	40%	$971
8	1 Bedroom	20%	$520
8	1 Bedroom	30%	$780
4	1 Bedroom	40%	$1,040
8	1 Bedroom	50%	$1,300
10	1 Bedroom	60%	$1,560
6	2 Bedrooms	20%	$624
6	2 Bedrooms	30%	$936
6	2 Bedrooms	40%	$1,248
6	2 Bedrooms	50%	$1,560
6	2 Bedrooms	60%	$1,872
6	3 Bedrooms	20%	$721
6	3 Bedrooms	30%	$1,081
6	3 Bedrooms	40%	$1,442
6	3 Bedrooms	50%	$1,803
6	3 Bedrooms	60%	$2,163
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$396,100
Construction Costs	$64,358,464
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,886,134
Soft Cost Contingency	$864,000
Relocation	$0
Architectural/Engineering	$3,054,000
Const. Interest, Perm. Financing	$11,270,221
Legal Fees	$643,000
Reserves	$2,219,794
Other Costs	$3,947,193
Developer Fee	$11,805,600
Commercial Costs	$0
Total	**$103,444,506**

Residential

Construction Cost Per Square Foot:	$598
Per Unit Cost:	$985,186
Estimated Hard Per Unit Cost:	$533,728
True Cash Per Unit Cost*:	$918,890
Bond Allocation Per Unit:	$498,381
Bond Allocation Per Restricted Rental Unit:	$503,173

Construction Financing

Source	Amount
U.S. Bank: Tax-Exempt	$52,330,000
U.S. Bank: Taxable	$15,204,116
HCD: LGMG	$2,078,154
HCD: IIG	$7,230,000
City of LA: ULA[1]	$10,559,557
Deferred Operating Deficit	$721,912
Deferred RAD Reserve	$1,124,000
Deferred Transition Reserve	$373,882
Deferred Developer Fee	$7,203,325
General Partner Equity	$100
Tax Credit Equity	$6,619,460

Permanent Financing

Source	Amount
U.S. Bank: Tax-Exempt	$1,100,000
U.S. Bank: Taxable	$11,720,000
HCD: LGMG	$2,078,154
HCD: AHSC	$19,665,859
HCD: IIG	$7,230,000
City of LA: ULA[1]	$10,559,557
Deferred Developer Fee	$6,961,100
General Partner Equity	$100
Tax Credit Equity	$44,129,736
TOTAL	**$103,444,506**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]United to House LA Accelerator Plus Program

Determination of Credit Amount(s)

Requested Eligible Basis:	$95,363,333
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$123,972,333
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,958,397
Approved Developer Fee (in Project Cost & Eligible Basis):	$11,805,600
Federal Tax Credit Factor:	$0.89000

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 $893,092. The applicant noted that the per unit cost is attributed to prevailing wages, public park cost, parking, premium finishes, site work, demolition, remediation, electrical services, and holding cost.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 108.773%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Mulberry Gardens Family Apartments, located at 2560 Mulberry Street in Riverside on a 2.81 acre site, requested and is being recommended for a reservation of $4,561,791 in annual federal tax credits and $48,178,510 of tax-exempt bond cap to finance the new construction of 150 units of housing, consisting of 149 restricted rental units and 1 unrestricted manager's unit. The project will have 73 one-bedroom units, 39 two-bedroom units, and 38 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in April 2025 and be completed in April 2027. The project will be developed by Eden Housing, Inc. and will be located in Senate District 31 and Assembly District 41.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Infill Infrastructure Grant (IIG), Affordable Housing and Sustainable Communities (AHSC), and Local Government Matching Grant (LGMG) programs of HCD and the BUILD program of California Energy Commision (CEC).

Project Number	CA-24-661

Project Name	Mulberry Gardens Family Apartments
Site Address:	2560 Mulberry Street Riverside, CA 92501
County:	Riverside
Census Tract:	301.03

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,561,791	$0
Recommended:	$4,561,791	$0

Tax-Exempt Bond Allocation

Recommended:	$48,178,510

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Eden Housing, Inc.
Contact:	Aruna Doddapaneni
Address:	22645 Grand Street Hayward, CA 94541
Phone:	619-848-7818
Email:	aruna.doddapaneni@edenhousing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Chase Bank

Development Team

General Partner(s) or Principal Owner(s):	Mulberry Gardens Family LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Eden Housing, Inc
Developer:	Eden Housing, Inc.
Investor/Consultant:	Community Economics, Inc.
Management Agent:	Eden Housing Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	150	
No. / % of Low Income Units:	149	100.00%
Average Targeted Affordability:	45.51%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME / HUD Section 8 Project-based Vouchers (37 Units - 25%)	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	38	26%
40% AMI:	22	15%
50% AMI:	58	39%
60% AMI:	31	21%

Unit Mix

73	1-Bedroom Units
39	2-Bedroom Units
38	3-Bedroom Units
150	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
10	1 Bedroom	30%	$576
12	1 Bedroom	30%	$576
6	1 Bedroom	40%	$769
5	1 Bedroom	40%	$769
40	1 Bedroom	50%	$961
2	2 Bedrooms	30%	$691
6	2 Bedrooms	30%	$691
3	2 Bedrooms	40%	$922
4	2 Bedrooms	40%	$922
23	2 Bedrooms	60%	$1,383
2	3 Bedrooms	30%	$799
6	3 Bedrooms	30%	$799
4	3 Bedrooms	40%	$1,066
18	3 Bedrooms	50%	$1,332
8	3 Bedrooms	60%	$1,599
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$799,448
Construction Costs	$62,778,340
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,897,682
Soft Cost Contingency	$800,000
Relocation	$0
Architectural/Engineering	$1,795,821
Const. Interest, Perm. Financing	$8,724,142
Legal Fees	$115,000
Reserves	$802,014
Other Costs	$3,353,750
Developer Fee	$8,500,000
Commercial Costs	$0
Total	**$92,566,197**

Residential

Construction Cost Per Square Foot:	$538
Per Unit Cost:	$617,108
Estimated Hard Per Unit Cost:	$370,988
True Cash Per Unit Cost*:	$610,441
Bond Allocation Per Unit:	$321,190
Bond Allocation Per Restricted Rental Unit:	$323,346

Construction Financing

Source	Amount
Chase: Tax-Exempt	$48,178,510
Chase: Taxable	$7,931,119
County of Riverside: HOME	$2,000,000
City of Riverside: HOME	$1,154,171
HCD: IIG	$8,746,488
HCD: LGMG	$8,100,000
CEC: BUILD Grant	$648,475
Sponsor Loan: Eden	$3,000,000
Deferred Costs	$7,572,014
Deferred Developer Fee	$1,000,000
General Partner Equity	$100
Tax Credit Equity	$4,235,319

Permanent Financing

Source	Amount
Chase: Tax-exempt	$5,104,000
County of Riverside: HOME	$2,000,000
City of Riverside: HOME	$1,154,171
HCD: AHSC	$14,000,000
HCD: IIG	$8,746,488
HCD: LGMG	$8,100,000
CEC: BUILD Grant	$648,475
Sponsor Loan: Eden	$3,000,000
Deferred Developer Fee	$1,000,000
General Partner Equity	$5,000,000
Solar Tax Credit Equity	$163,869
Tax Credit Equity	$43,649,194
TOTAL	**$92,566,197**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$87,726,751
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$114,044,776
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,561,791
Approved Developer Fee (in Project Cost & Eligible Basis):	$8,500,000
Federal Tax Credit Factor:	$0.95684

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 113.651%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Parkside Apartments, located at 1310 Craig Avenue in Lakeport on a 3.02 acre site, requested and is being recommended for a reservation of $1,825,913 in annual federal tax credits and $19,285,718 of tax-exempt bond cap to finance the new construction of 64 units of housing, consisting of 63 restricted rental units and 1 unrestricted manager's unit. The project will have 32 two-bedroom units, and 32 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Danco Communities and will be located in Senate District 2 and Assembly District 4.

The project financing includes state funding from the Infill Infrastructure Grant (IIG) and Permanent Local Housing Allocation (PLHA) programs of HCD.

Project Number	CA-24-664
Project Name	Parkside Apartments
Site Address:	1310 Craig Avenue Lakeport, CA 95453
County:	Lake
Census Tract:	3.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,825,913	$0
Recommended:	$1,825,913	$0

Tax-Exempt Bond Allocation
Recommended: $19,285,718

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Valley Initative for Affordable Housing
Contact:	Emily Haden
Address:	P.O. Box 2574 Merced, CA 95344
Phone:	(209) 167-8476
Email:	ehaden@hadenlaw.comcast.biz.net

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Johnson & Johnson Investments, LLC WSA Partners I, LLC Valley Initiative for Affordable Housing
General Partner Type:	Joint Venture
Parent Company(ies):	Johnson & Johnson Investments, LLC WSA Partners I, LLC Valley Initiative for Affordable Housing
Developer:	Danco Communities
Investor/Consultant:	Boston Financial
Management Agent:	Danco Property Management

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	64	
No. / % of Low Income Units:	63	100.00%
Average Targeted Affordability:	47.38%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / Community Development Block Grant (CDBG) / Community Development Block Grant - Disaster Recovery (CDBG-DR)	

Information

Housing Type:	Large Family
Geographic Area:	N/A
State Ceiling Pool:	$500 Million State Credit Ceiling
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	15	24%
40% AMI:	8	13%
50% AMI:	14	22%
60% AMI:	26	41%

Unit Mix

32	2-Bedroom Units
32	3-Bedroom Units
64	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
7	2 Bedrooms	30%	$594
4	2 Bedrooms	40%	$792
7	2 Bedrooms	50%	$990
13	2 Bedrooms	60%	$1,172
8	3 Bedrooms	30%	$685
4	3 Bedrooms	40%	$914
7	3 Bedrooms	50%	$1,143
13	3 Bedrooms	60%	$1,312
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$650,000
Construction Costs	$24,882,448
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,244,122
Soft Cost Contingency	$184,687
Relocation	$0
Architectural/Engineering	$1,144,425
Const. Interest, Perm. Financing	$1,367,082
Legal Fees	$115,000
Reserves	$201,211
Other Costs	$1,972,754
Developer Fee	$4,580,055
Commercial Costs	$0
Total	**$36,341,784**

Residential	
Construction Cost Per Square Foot:	$395
Per Unit Cost:	$567,840
Estimated Hard Per Unit Cost:	$304,588
True Cash Per Unit Cost*:	$534,726
Bond Allocation Per Unit:	$301,339
Bond Allocation Per Restricted Rental Unit:	$306,123

Construction Financing

Source	Amount
Citi: Tax-Exempt	$19,312,428
CDBG-DR	$2,396,301
CDBG	$6,230,384
HCD: IIG	$2,165,681
Tax Credit Equity	$6,236,990

Permanent Financing

Source	Amount
Citi: Tax-Exempt	$4,619,881
CDBG	$6,230,384
CDBG-DR	$2,396,301
HCD: IIG	$2,165,681
HCD: PLHA	$2,570,805
Net Operating Income	$800,000
Deferred Developer Fee	$2,119,329
Solar Tax Credit Equity	$466,898
Tax Credit Equity	$14,972,505
TOTAL	**$36,341,784**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$35,113,757
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$45,647,884
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,825,913
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,580,055
Federal Tax Credit Factor:	$0.82000

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 93.410%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Brandon Place Apartments, located at 3941 Polk Street in Riverside on a 6.31 acre site, requested and is being recommended for a reservation of $2,078,124 in annual federal tax credits and $28,000,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 197 units of housing, consisting of 195 restricted rental units and 2 unrestricted managers' units. The project has 148 one-bedroom units, and 49 two-bedroom units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in January 2025 and be completed in January 2026. The project will be developed by Spira BP Development, LP and is located in Senate District 31 and Assembly District 58.

Brandon Place Apartments is a re-syndication of an existing Low Income Housing Tax Credit (LIHTC) project, Brandon Place Apartments (CA-96-905). See Resyndication and Resyndication Transfer Event below for additional information. The project is currently at-risk, but is being recommended for a reservation of tax credits that will preserve affordability for an additional 55 years.

Project Number	CA-24-666
Project Name	Brandon Place Apartments
Site Address:	3941 Polk Street Riverside, CA 92505
County:	Riverside
Census Tract:	414.07

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,078,124	$0
Recommended:	$2,078,124	$0

Tax-Exempt Bond Allocation
Recommended: $28,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Brandon Place, LP
Contact:	Robert Lee
Address:	1015 Fillmore Street, PMB 31735 San Francisco, CA 94115
Phone:	604-716-6225
Email:	robert@spiraequitypartners.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CSCDA
Bond Counsel:	Carle Mackie Power & Ross LLP
Private Placement Purchaser:	Newmark

Development Team

General Partners or Principal Owners: Spira Brandon Place, LP
FFAH II BP Senior Apartments, LLC
General Partner Type: Joint Venture
Parent Companies: Spira Brandon Place, LLC
Foundation for Affordable Housing II, Inc.
Developer: Spira BP Development, LP
Investor/Consultant: NEF Assignment Corporation
Management Agent: Aperto Property Management, Inc.

Project Information

Construction Type: Acquisition & Rehabilitation
Total # Residential Buildings: 15
Total # of Units: 197
No. / % of Low Income Units: 195 100.00%
Average Targeted Affordability: 55.89%
Federal Set-Aside Elected: 40%/60%
Federal Subsidy: Tax-Exempt

Information

Housing Type: At-Risk
Geographic Area: Inland Empire Region
State Ceiling Pool: Preservation
Set Aside: N/A
CDLAC Project Analyst: Brandon Medina
CTCAC Project Analyst: Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	of Affordable Units
30% AMI:	20	10%
50% AMI:	20	10%
60% AMI:	155	79%

Unit Mix

148 1-Bedroom Units
49 2-Bedroom Units
197 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
15	1 Bedroom	30%	$576
15	1 Bedroom	50%	$960
117	1 Bedroom	60%	$1,153
4	2 Bedrooms	30%	$691
4	2 Bedrooms	50%	$1,152
32	2 Bedrooms	60%	$1,383
1	2 Bedrooms	30%	$691
1	2 Bedrooms	50%	$1,152
6	2 Bedrooms	60%	$1,383
1	2 Bedrooms	Manager's Unit	$0
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$37,150,000
New Construction Costs	$0
Rehabilitation Costs	$8,144,625
Construction Hard Cost Contingency	$798,862
Soft Cost Contingency	$94,386
Relocation	$19,700
Architectural/Engineering	$225,000
Const. Interest, Perm. Financing	$2,194,953
Legal Fees	$120,500
Reserves	$613,385
Other Costs	$467,920
Developer Fee	$3,316,307
Commercial Costs	$0
Total	**$53,145,638**

Residential	
Construction Cost Per Square Foot:	$60
Per Unit Cost:	$269,775
Estimated Hard Per Unit Cost:	$35,600
True Cash Per Unit Cost*:	$252,941
Bond Allocation Per Unit:	$142,132
Bond Allocation Per Restricted Rental Unit:	$143,590

Construction Financing

Source	Amount
Newmark: Tax-Exempt	$28,000,000
Newmark: Recycled Tax-Exempt	$5,000,000
Net Operating Income	$1,603,138
General Partner Note	$10,225,993
Deferred Developer Fee	$3,316,307
General Partner Equity	$100
Tax Credit Equity	$5,000,100

Permanent Financing

Source	Amount
Newmark: Tax-Exempt	$24,250,000
Net Operating Income	$1,603,138
General Partner Note	$5,272,877
Deferred Developer Fee	$3,316,307
General Partner Equity	$100
Tax Credit Equity	$18,703,216
TOTAL	**$53,145,638**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$12,291,682
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$35,973,932
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$15,979,187
Qualified Basis (Acquisition):	$35,973,932
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$639,167
Maximum Annual Federal Credit, Acquisition:	$1,438,957
Total Maximum Annual Federal Credit:	$2,078,124
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,316,307
Federal Tax Credit Factor:	$0.90000

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
The proposed rent does not include a utility allowance. The owner will pay for all utilities.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event
Prior to closing, the applicant or its assignee shall obtain CTCAC's consent to assign and assume the existing Regulatory Agreement (CA-96-905). To be eligible for a new award of tax credits, the owner must provide documentation with the Form 8609 request (the placed-in-service submission) that the acquisition date and the placed-in-service date both occurred after the existing federal 15-year compliance period was completed. For resyndications that were originally rehabilitation and acquisition, the resyndication acquisition date cannot occur before the last rehabilitation credit year of the original credit period.

As required by the IRS, the newly resyndicated project will continue to use the originally assigned Building Identification Numbers (BINs).

The newly resyndicated project shall continue to meet the rents and income targeting levels in the existing regulatory agreement(s) and any deeper targeting levels in the new regulatory agreement(s) for the duration of the new regulatory agreement(s). Existing households determined to be income-qualified for purposes of IRC §42 credit during the 15-year compliance period are concurrently income-qualified households for purposes of the extended use agreement. As a result, any household determined to be income qualified at the time of move-in under the existing regulatory agreement (CA-96-905) is a qualified low-income household for the subsequent allocation (existing household eligibility is “grandfathered”).

The project is a re-syndication occurring concurrently with a Transfer Event. The existing tax credit regulatory agreement has a remaining term of five (5) or less years, and thus the project is waived from setting aside a Short Term Work Capitalized Replacement Reserve that is otherwise required.

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

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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max.**	**Points Scored**
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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

Tie Breaker: 199.302%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Wakeland Riverwalk, located at 6364 Village Drive in San Diego on a 1.69 acre site, requested and is being recommended for a reservation of $6,875,755 in annual federal tax credits and $10,725,542 in total state tax credits and $70,150,547 of tax-exempt bond cap to finance the new construction of 190 units of housing, consisting of 188 restricted rental units and 2 unrestricted manager's units. The project will have 46 one-bedroom units, 89 two-bedroom units, and 55 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in August 2027. The project will be developed by Wakeland Housing and Development Corporation and will be located in Senate District 39 and Assembly District 78.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number	CA-24-667
Project Name	Wakeland Riverwalk
Site Address:	6364 Village Drive San Diego, CA 92108
County:	San Diego
Census Tract:	89.02

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$6,875,755	$10,725,542
Recommended:	$6,875,755	$10,725,542

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation	
Recommended:	$70,150,547

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	Wakeland Housing and Development Corporation
Applicant for State Credits:	Wakeland Housing and Development Corporation
Contact:	Lisa Huff
Address:	1230 Columbia Street, #950 San Diego, 92101
Phone:	858-699-2044
Email:	lhuff@wakelandhdc.com

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	CalHFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Banner Bank

Development Team

General Partner(s) or Principal Owner(s):	Wakeland Riverwalk Family LLC SDR Affordable 1 LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Wakeland Housing and Development Corporation SD Riverwalk LLC
Developer:	Wakeland Housing and Development Corporation
Investor/Consultant:	California Housing Partnership
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	3	
Total # of Units:	190	
No. / % of Low Income Units:	188	100.00%
Average Targeted Affordability:	49.95%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Diego County
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	48	26%
50% AMI:	45	24%
60% AMI:	95	51%

Unit Mix

46	1-Bedroom Units
89	2-Bedroom Units
55	3-Bedroom Units
190	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
12	1 Bedroom	30%	$852
7	1 Bedroom	50%	$1,420
27	1 Bedroom	60%	$1,704
22	2 Bedrooms	30%	$1,023
14	2 Bedrooms	50%	$1,705
51	2 Bedrooms	60%	$2,046
14	3 Bedrooms	30%	$1,182
24	3 Bedrooms	50%	$1,970
17	3 Bedrooms	60%	$2,364
2	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$578,168
Construction Costs	$94,017,771
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,720,725
Soft Cost Contingency	$472,692
Relocation	$0
Architectural/Engineering	$2,785,615
Const. Interest, Perm. Financing	$18,177,787
Legal Fees	$155,000
Reserves	$792,876
Other Costs	$5,885,687
Developer Fee	$17,246,876
Commercial Costs	$0
Total	**$144,833,197**

Residential	
Construction Cost Per Square Foot:	$524
Per Unit Cost:	$762,280
Estimated Hard Per Unit Cost:	$434,627
True Cash Per Unit Cost*:	$683,086
Bond Allocation Per Unit:	$369,213
Bond Allocation Per Restricted Rental Unit:	$373,141

Construction Financing

Source	Amount
Banner Bank: Tax-Exempt	$70,150,547
Banner Bank: Taxable	$41,760,301
Banner Bank: Recycled Tax-Exempt	$1,000,000
HCD: AHSC HRI[1]	$3,500,000
General Partner Loan	$4,000,000
Deferred Costs	$2,250,877
Deferred Developer Fee	$15,046,876
Tax Credit Equity	$7,124,596

Permanent Financing

Source	Amount
Banner Bank: Tax-Exempt	$22,968,000
HCD: AHSC HRI[1]	$3,500,000
HCD: AHSC AHD[2]	$26,445,162
General Partner Loan	$4,000,000
Deferred Developer Fee	$15,046,876
Tax Credit Equity	$72,873,159
TOTAL	**$144,833,197**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Housing Related Infrastructure
[2] Affordable Housing Development

Determination of Credit Amount(s)

Requested Eligible Basis:	$132,226,050
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$171,893,865
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$6,875,755
Total State Credit:	$10,725,542
Approved Developer Fee (in Project Cost & Eligible Basis):	$17,246,876
Federal Tax Credit Factor:	$0.92761
State Tax Credit Factor:	$0.84781

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 high cost of $683,086 per unit. The applicant noted the per unit cost is due to Southern California's increased construction costs, a large parking structure, remedial grading and temporary shoring, and prevailing wages. Additionally, the applicant noted increased costs specific to the size of the project which requires a large photovoltaic system and the use of cranes and manlifts.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 103.268%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Balboa Reservoir - Building E, located at 11 Frida Kahlo Way in San Francisco on a 0.76 acre site, requested and is being recommended for a reservation of $5,244,316 in annual federal tax credits and $73,004,348 of tax-exempt bond cap to finance the new construction of 128 units of housing, consisting of 127 restricted rental units and 1 unrestricted manager's unit. The project will have 56 one-bedroom units, 40 two-bedroom units, and 32 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by BRIDGE Housing Corporation and will be located in Senate District 11 and Assembly District 19.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number	CA-24-670

Project Name	Balboa Reservoir - Building E
Site Address:	11 Frida Kahlo Way San Francisco, CA 94112
County:	San Francisco
Census Tract:	310.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,244,316	$0
Recommended:	$5,244,316	$0

Tax-Exempt Bond Allocation	
Recommended:	$73,004,348

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Balboa Lee Avenue, L.P.
Contact:	Smitha Seshadri
Address:	350 California Street, 16th Floor San Francisco, CA 94104
Phone:	415-321-3516
Email:	sseshadri@bridgehousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	City and County of San Francisco
Bond Counsel:	Kutak Rock LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Balboa Lee Avenue LLC
General Partner Type:	Nonprofit
Parent Company(ies):	BRIDGE Housing Corporation
Developer:	BRIDGE Housing Corporation
Investor/Consultant:	California Housing Partnership
Management Agent:	BRIDGE Property Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	128	
No. / % of Low Income Units:	127	100.00%
Average Targeted Affordability:	49.38%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Francisco County
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	31	24%
50% AMI:	36	28%
60% AMI:	60	47%

Unit Mix

56 1-Bedroom Units
40 2-Bedroom Units
32 3-Bedroom Units
128 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
15	1 Bedroom	30%	$1,101
10	2 Bedrooms	30%	$1,322
6	3 Bedrooms	30%	$1,498
18	1 Bedroom	50%	$1,802
12	2 Bedrooms	50%	$2,191
6	3 Bedrooms	50%	$2,435
23	1 Bedroom	60%	$2,203
17	2 Bedrooms	60%	$2,644
20	3 Bedrooms	60%	$2,998
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$12,964,622
Construction Costs	$83,649,859
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,729,060
Soft Cost Contingency	$716,412
Relocation	$0
Architectural/Engineering	$2,628,018
Const. Interest, Perm. Financing	$12,829,667
Legal Fees	$247,500
Reserves	$1,125,214
Other Costs	$3,840,365
Developer Fee	$17,101,029
Commercial Costs	$0
Total	**$139,831,746**

Residential

Construction Cost Per Square Foot:	$618
Per Unit Cost:	$1,092,436
Estimated Hard Per Unit Cost:	$568,230
True Cash Per Unit Cost*:	$1,084,389
Bond Allocation Per Unit:	$570,346
Bond Allocation Per Restricted Rental Unit:	$574,837

Construction Financing

Source	Amount
Citibank: Tax Exempt	$73,004,348
Citibank: Taxable	$6,862,434
SF MOHCD[1]	$37,531,286
Developer Fee Contribution	$13,601,029
Deferred Developer Fee	$1,030,000
Deferred Costs	$2,845,234
Tax Credit Equity	$4,957,415

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$15,672,000
HCD: AHSC	$19,610,404
HCD: AHSC STI[2]	$1,179,373
SF MOHCD[1]	$37,531,286
Developer Fee Contribution	$13,601,029
Deferred Developer Fee	$1,030,000
Tax Credit Equity	$51,207,654
TOTAL	**$139,831,746**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]San Francisco Mayor's Office of Housing and Community Development
[2]Sustainable Transportation Infrastructure

Determination of Credit Amount(s)

Requested Eligible Basis:	$131,107,892
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$131,107,892
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,244,316
Approved Developer Fee (in Project Cost & Eligible Basis):	$17,101,029
Federal Tax Credit Factor:	$0.97644

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 $1,093,853. The applicant noted that the per unit cost is attributed to prevailing wages, local permit fees, high interest rate environment, and construction cost.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 126.190%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 1250 West Jeff, located at 1250 West Jefferson Boulevard in Los Angeles on a 0.67 acre site, requested and is being recommended for a reservation of $4,389,221 in annual federal tax credits and $47,767,550 of tax-exempt bond cap to finance the new construction of 122 units of housing, consisting of 121 restricted rental units and 1 unrestricted manager's unit. The project will have 15 studio units, 29 one-bedroom units, 42 two-bedroom units, and 36 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Community Builders Group and will be located in Senate District 28 and Assembly District 57.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Contract.

Project Number	CA-24-671

Project Name	1250 West Jeff
Site Address:	1250 West Jefferson Boulevard
	Los Angeles, CA 90007
County:	Los Angeles
Census Tract:	2226.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,389,221	$0
Recommended:	$4,389,221	$0

Tax-Exempt Bond Allocation	
Recommended:	$47,767,550

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	South Catalina Street I LP
Contact:	Joseph Seager
Address:	424 North Lake Avenue, Suite 305
	Pasadena, CA 91101
Phone:	(626) 797-3888
Email:	seager@theCBG.com

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Rose Community Capital, LLC

Development Team	
General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing
	West Jefferson Investment LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing
	Community Builders Group, LLC
Developer:	Community Builders Group
Investor/Consultant:	Walker & Dunlop
Management Agent:	WinnResidential California L.P

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	122	
No. / % of Low Income Units:	121	100.00%
Average Targeted Affordability:	58.14%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Contract (122 Units - 100%)	

Information

Housing Type:	Large Family
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	13	11%
50% AMI:	13	11%
60% AMI:	79	65%
80% AMI*:	16	13%

*CTCAC restricted only

Unit Mix

15 SRO/Studio Units
29 1-Bedroom Units
42 2-Bedroom Units
36 3-Bedroom Units
122 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
2	SRO/Studio	30%	$728
2	SRO/Studio	50%	$1,213
8	SRO/Studio	60%	$1,456
3	SRO/Studio	80%	$1,867
3	1 Bedroom	30%	$780
3	1 Bedroom	50%	$1,300
13	1 Bedroom	60%	$1,560
4	1 Bedroom	60%	$1,560
5	1 Bedroom	80%	$2,002
4	2 Bedrooms	30%	$936
4	2 Bedrooms	50%	$1,560
4	2 Bedrooms	60%	$1,872
23	2 Bedrooms	60%	$1,872
7	2 Bedrooms	80%	$2,496
4	3 Bedrooms	30%	$1,081
4	3 Bedrooms	50%	$1,803
27	3 Bedrooms	60%	$2,163
1	3 Bedrooms	80%	$2,885
1	1 Bedroom	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$4,119,600
Construction Costs	$57,578,693
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,327,909
Soft Cost Contingency	$1,250,000
Relocation	$0
Architectural/Engineering	$661,175
Const. Interest, Perm. Financing	$7,939,152
Legal Fees	$785,000
Reserves	$1,397,946
Other Costs	$4,416,675
Developer Fee	$11,009,751
Commercial Costs	$0
Total	**$92,485,901**

Residential

Construction Cost Per Square Foot:	$536
Per Unit Cost:	$758,081
Estimated Hard Per Unit Cost:	$399,150
True Cash Per Unit Cost*:	$703,383
Bond Allocation Per Unit:	$391,537
Bond Allocation Per Restricted Rental Unit:	$454,929

Construction Financing

Source	Amount
RCC[1]: Tax-Exempt	$47,767,550
RCC[1]: Recycled Tax-Exempt	$297,885
Sterling Bank (SB): Taxable	$16,899,893
SB: Recycled Tax-Exempt	$7,563,417
Deferred Costs	$1,397,946
Deferred Developer Fee	$11,009,751
Tax Credit Equity	$7,549,459

Permanent Financing

Source	Amount
RCC[1]: Tax-Exempt	$48,065,435
Deferred Developer Fee	$6,673,168
Tax Credit Equity	$37,747,298
TOTAL	**$92,485,901**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Rose Community Capital

Determination of Credit Amount(s)

Requested Eligible Basis:	$84,408,091
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$109,730,518
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,389,221
Approved Developer Fee (in Project Cost & Eligible Basis):	$11,009,751
Federal Tax Credit Factor:	$0.86000

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 $703,383. The applicant noted that the per unit cost is attributed to prevailing wages, type III construction costs, and the in-fill nature of the site.

The current legal description is part of a larger site and the project site's parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-671 must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 117.357%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 525 N Capitol, located at 525 North Capitol Avenue in San Jose on a 0.97 acre site, requested and is being recommended for a reservation of $4,592,462 in annual federal tax credits and $62,535,038 of tax-exempt bond cap to finance the new construction of 160 units of housing, consisting of 158 restricted rental units and 2 unrestricted manager's units. The project will have 60 studio units, 64 one-bedroom units, 28 two-bedroom units, and 8 three-bedroom units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in March 2027. The project will be developed by Community Development Partners and will be located in Senate District 15 and Assembly District 24.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Infill Infrastructure Grant (IIG) program of HCD.

Project Number CA-24-672

Project Name 525 N Capitol
Site Address: 525 North Capitol Avenue
San Jose, CA 95133
County: Santa Clara
Census Tract: 5038.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,592,462	$0
Recommended:	$4,592,462	$0

Tax-Exempt Bond Allocation
Recommended: $62,535,038

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: 525 Capitol LP
Contact: Angela Heyward
Address: 3416 Via Oporto, Suite 301
Newport Beach, CA 92663
Phone: 310-497-3037
Email: angela@communitydevpartners.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: City of San Jose
Bond Counsel: Stradling, Yocca, Carlson & Rauth
Private Placement Purchaser: Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	525 Capitol CDP LLC FFAH V 525 Capitol, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Community Development Partners Foundation for Affordable Housing
Developer:	Community Development Partners
Investor/Consultant:	R4 Capital
Management Agent:	FPI Management

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	160
No. / % of Low Income Units:	158 100.00%
Average Targeted Affordability:	44.94%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (65 Units - 41%)

Information

Housing Type:	Non-Targeted
Geographic Area:	South and West Bay Region
State Ceiling Pool:	N/A
Set Aside:	N/A
Homeless Set Aside Units:	40
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	71	45%
50% AMI:	25	16%
60% AMI:	62	39%

Unit Mix

60	SRO/Studio Units
64	1-Bedroom Units
28	2-Bedroom Units
8	3-Bedroom Units
160	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
29	SRO/Studio	60%	$1,936
31	SRO/Studio	30%	$968
28	1 Bedroom	60%	$2,074
25	1 Bedroom	50%	$1,728
11	1 Bedroom	30%	$1,037
5	2 Bedrooms	60%	$2,488
4	2 Bedrooms	30%	$1,244
7	2 Bedrooms	30%	$1,244
10	2 Bedrooms	30%	$1,244
8	3 Bedrooms	30%	$1,437
2	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$7,430,883
Construction Costs	$79,172,678
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,927,884
Soft Cost Contingency	$544,050
Relocation	$0
Architectural/Engineering	$3,595,542
Const. Interest, Perm. Financing	$11,974,917
Legal Fees	$452,595
Reserves	$850,438
Other Costs	$3,292,530
Developer Fee	$14,976,918
Commercial Costs	$0
Total	**$126,218,435**

Residential

Construction Cost Per Square Foot:	$634
Per Unit Cost:	$788,865
Estimated Hard Per Unit Cost:	$434,590
True Cash Per Unit Cost*:	$756,897
Bond Allocation Per Unit:	$390,844
Bond Allocation Per Restricted Rental Unit:	$395,791

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$62,535,038
Citibank: Taxable	$14,787,729
HCD: IIG	$4,000,000
Santa Clara County	$8,000,000
City of San Jose	$20,000,000
City of San Jose: Land	$6,500,000
Housing Trust Silicon Valley	$4,500,000
Deferred Costs	$1,670,603
Tax Credit Equity	$4,225,065

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$26,150,000
HCD: IIG	$4,000,000
Santa Clara County	$8,000,000
City of San Jose	$20,000,000
City of San Jose: Land	$6,500,000
Housing Trust Silicon Valley	$4,500,000
Accrued Interest	$1,714,167
Developer Fee Contribution	$7,737,025
Deferred Developer Fee	$5,114,903
Solar Equity	$251,687
Tax Credit Equity	$42,250,654
TOTAL	**$126,218,435**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$114,823,041
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$114,823,041
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,592,462
Approved Developer Fee (in Project Cost & Eligible Basis):	$14,976,918
Federal Tax Credit Factor:	$0.92000

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 cost of $756,897. The applicant noted that the per unit cost is attributed to prevailing wage requirements and building obligations imposed by the City of San Jose.

The project anticipates receiving a 15-year Section-8 project based voucher (PBV) rental subsidy for 65 of the 158 tax-credit units. Twenty-five (25) PBVs are set aside for homeless veterans under the Veterans Affairs Supportive Housing program. Fifteen (15) PBVs are set aside for chronically homeless families under the Chronically Homeless Direct Referral program.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 134.366%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Meridian at Corona Station, located at 890 North McDowell Boulevard in Petaluma on a 4.83 acre site, requested and is being recommended for a reservation of $4,176,167 in annual federal tax credits and $48,625,159 of tax-exempt bond cap to finance the new construction of 131 units of housing, consisting of 130 restricted rental units and 1 unrestricted manager's unit. The project will have 33 studio units, 29 one-bedroom units, 35 two-bedroom units, and 34 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Danco Communities and will be located in Senate District 2 and Assembly District 10.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number CA-24-673

Project Name Meridian at Corona Station
Site Address: 890 North McDowell Boulevard
Petaluma, CA 94954
County: Sonoma
Census Tract: 1506.09

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,176,167	$0
Recommended:	$4,176,167	$0

Tax-Exempt Bond Allocation
Recommended: $48,625,159

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Community Revitalization and Development Corporation
Contact: David Rutledge
Address: 1918 West Street
Redding, CA 96001
Phone: (530) 241-6960
Email: david@crdc-housing.org

Bond Financing Information
CDLAC Applicant/Bond Issuer: CMFA
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: Citibank, N.A.

Development Team

General Partners / Principal Owners:	Johnson & Johnson Investments, LLC Community Revitalization and Development Corporation Danco Communities
General Partner Type:	Joint Venture
Parent Companies:	Community Revitalization and Development Corporation Danco Communities
Developer:	Danco Communities
Investor/Consultant:	Boston Financial
Management Agent:	Danco Property Management

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	7	
Total # of Units:	131	
No. / % of Low Income Units:	130	100.00%
Average Targeted Affordability:	50.70%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (33 Units - 25%)	

Information

Housing Type:	Large Family
Geographic Area:	Northern Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	33
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	33	25%
50% AMI:	15	12%
60% AMI:	82	63%

Unit Mix

33	SRO/Studio Units
29	1-Bedroom Units
35	2-Bedroom Units
34	3-Bedroom Units
131	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
29	SRO/Studio	30%	$726
4	SRO/Studio	60%	$1,362
4	1 Bedroom	30%	$778
4	1 Bedroom	50%	$1,297
21	1 Bedroom	60%	$1,557
5	2 Bedrooms	50%	$1,556
30	2 Bedrooms	60%	$1,867
6	3 Bedrooms	50%	$1,798
27	3 Bedrooms	60%	$2,087
1	3 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$9,736,327
Construction Costs	$51,903,066
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,595,153
Soft Cost Contingency	$466,517
Relocation	$0
Architectural/Engineering	$1,358,911
Const. Interest, Perm. Financing	$4,117,995
Legal Fees	$115,000
Reserves	$633,778
Other Costs	$9,773,432
Developer Fee	$10,475,338
Commercial Costs	$0
Total	**$91,175,517**

Residential	
Construction Cost Per Square Foot:	$417
Per Unit Cost:	$695,996
Estimated Hard Per Unit Cost:	$336,012
True Cash Per Unit Cost*:	$617,412
Bond Allocation Per Unit:	$371,184
Bond Allocation Per Restricted Rental Unit:	$374,040

Construction Financing

Source	Amount
Citi Bank: Tax-Exempt	$48,625,159
Citi Bank: Taxable	$1,186,326
HCD: AHSC	$20,000,000
City of Petaluma Loan	$2,000,000
Impact Fee Waiver	$3,044,702
Deferred Developer Fee	$7,249,823
Tax Credit Equity	$9,069,507

Permanent Financing

Source	Amount
Citi Bank: Taxable	$21,939,958
HCD: AHSC	$20,000,000
City of Petaluma Loan	$2,000,000
Impact Fee Waiver	$3,044,702
Deferred Developer Fee	$7,249,820
Solar Equity	$608,373
Tax Credit Equity	$36,332,664
TOTAL	**$91,175,517**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$80,310,927
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$104,404,205
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,176,167
Approved Developer Fee (in Project Cost & Eligible Basis):	$10,475,338
Federal Tax Credit Factor:	$0.87000

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 92.041%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Mountain Townhomes, located at 735 Chestnut Street in Mount Shasta on a 1.26 acre site, requested and is being recommended for a reservation of $679,923 in annual federal tax credits and $3,059,307 in total state tax credits and $9,427,356 of tax-exempt bond cap to finance the new construction of 25 units of housing, consisting of 24 restricted rental units and 1 unrestricted manager's unit. The project will have 2 one-bedroom units, 13 two-bedroom units, and 10 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Danco Communities and will be located in Senate District 1 and Assembly District 1.

The project financing includes state funding from the Infill Infrastructure Grant (IIG) & Permanent Local Housing Allocation (PLHA) programs of HCD.

Project Number CA-24-675

Project Name Mountain Townhomes
Site Address: 735 Chestnut Street
Mount Shasta, CA 96067
County: Siskiyou
Census Tract: 10.00

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$679,923	$3,059,307
Recommended:	$679,923	$3,059,307

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation
Recommended: $9,427,356

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Community Revitalization and Development Corporation
Contact: David Rutledge
Address: 1918 West Street
Redding, CA 96001
Phone: (530) 241-6960
Email: david@crdc-housing.org

Bond Financing Information
CDLAC Applicant/Bond Issuer: CMFA
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Mount Shasta Chestnut Street LLC Community Revitalization and Development Corporation
General Partner Type:	Joint Venture
Parent Company(ies):	Johnson & Johnson Investments, LLC Community Revitalization and Development Corporation
Developer:	Danco Communities
Investor/Consultant:	Boston Financial
Management Agent:	Danco Property Management

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	4	
Total # of Units:	25	
No. / % of Low Income Units:	24	100.00%
Average Targeted Affordability:	41.96%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	N/A
State Ceiling Pool:	N/A
Set Aside:	N/A
Homeless Set Aside Units:	3
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	4	17%
40% AMI:	3	13%
50% AMI:	13	54%
60% AMI:	4	17%

Unit Mix

2	1-Bedroom Units
13	2-Bedroom Units
10	3-Bedroom Units
25	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
1	1 Bedroom	30%	$495
1	1 Bedroom	50%	$659
2	2 Bedrooms	30%	$594
2	2 Bedrooms	40%	$792
7	2 Bedrooms	50%	$927
2	2 Bedrooms	60%	$927
1	3 Bedrooms	30%	$685
1	3 Bedrooms	40%	$914
5	3 Bedrooms	50%	$999
2	3 Bedrooms	60%	$999
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$460,000
Construction Costs	$10,193,081
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$509,654
Soft Cost Contingency	$146,045
Relocation	$0
Architectural/Engineering	$1,251,330
Const. Interest, Perm. Financing	$1,224,316
Legal Fees	$115,000
Reserves	$87,628
Other Costs	$1,639,199
Developer Fee	$2,217,138
Commercial Costs	$0
Total	**$17,843,391**

Residential	
Construction Cost Per Square Foot:	$366
Per Unit Cost:	$713,736
Estimated Hard Per Unit Cost:	$301,699
True Cash Per Unit Cost*:	$713,736
Bond Allocation Per Unit:	$377,094
Bond Allocation Per Restricted Rental Unit:	$392,807

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$9,427,356
Citibank: Taxable	$5,756,006
HCD: IIG	$1,342,600
Tax Credit Equity	$1,317,429

Permanent Financing

Source	Amount
Citibank	$1,068,962
HCD: IIG	$1,342,600
City of Mount Shasta: PLHA	$4,750,000
County of Siskiyou: PLHA	$1,885,321
Solar Tax Credit Equity	$192,391
Tax Credit Equity	$8,604,117
TOTAL	**$17,843,391**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$16,998,066
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$16,998,066
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$679,923
Total State Credit:	$3,059,307
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,217,138
Federal Tax Credit Factor:	$0.86500
State Tax Credit Factor:	$0.89000

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 $713,736. The applicant noted that the per unit cost is attributed to structural work to ensure snow loads will hold on the buildings, snow equipment and storage, and a COSR for the first fifteen years of operation.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 44.277%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Oaks on Balboa, located at 5435 - 5445 Balboa Boulevard in Los Angeles on a 2.4 acre site, requested and is being recommended for a reservation of $3,532,183 in annual federal tax credits and $40,000,000 of tax-exempt bond cap to finance the adaptive reuse of 117 units of housing, consisting of 116 restricted rental units and 1 unrestricted manager's unit. The project has 45 studio units, 71 one-bedroom units, and 1 two-bedroom unit, serving special needs tenants with rents affordable to households earning 30%-70% of area median income (AMI). The rehabilitation is expected to begin in July 2025 and be completed in December 2026. The project will be developed by Las Palmas Housing and Development Corporation and is located in Senate District 27 and Assembly District 46.

The project will be receiving rental assistance in the form of Flexible Housing Subsidy Pool (FHSP).

Project Number CA-24-679

Project Name Oaks on Balboa
- Site Address: 5435 - 5445 Balboa Boulevard, Los Angeles, CA 91316
- County: Los Angeles
- Census Tract: 1396.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,532,183	$0
Recommended:	$3,532,183	$0

Tax-Exempt Bond Allocation
- Recommended: $40,000,000

CTCAC Applicant Information
- CTCAC Applicant/CDLAC Sponsor: 5435 Balboa, LP
- Contact: Brian Mikail
- Address: 5455 Wilshire Blvd, Suite 1012, Los Angeles, CA 90036
- Phone: 310-666-6860
- Email: bmikail@capstoneequities.com

Bond Financing Information
- CDLAC Applicant/Bond Issuer: California Municipal Finance Agency
- Bond Counsel: Anzel Galvan LLP
- Private Placement Purchaser: Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Las Palmas Housing and Development Corporation Elysian Balboa, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Las Palmas Housing and Development Corporation Capstone Equities, LLC
Developer:	Las Palmas Housing and Development Corporation
Investor/Consultant:	R4 Capital
Management Agent:	TPC Management

Project Information

Construction Type:	Adaptive Reuse	
Total # Residential Buildings:	2	
Total # of Units:	117	
No. / % of Low Income Units:	116	100.00%
Average Targeted Affordability:	48.25%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Special Needs
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	58
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	58	50%
60% AMI:	17	15%
70% AMI*:	41	35%

*CTCAC restricted only

Unit Mix

45	SRO/Studio Units
71	1-Bedroom Units
1	2-Bedroom Units
117	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
9	SRO/Studio	30%	$728
17	SRO/Studio	60%	$1,456
19	SRO/Studio	70%	$1,699
49	1 Bedroom	30%	$780
22	1 Bedroom	70%	$1,780
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application

Land and Acquisition	$20,765,000
Construction Costs	$25,666,000
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,520,000
Soft Cost Contingency	$500,000
Relocation	$0
Architectural/Engineering	$2,396,400
Const. Interest, Perm. Financing	$10,491,250
Legal Fees	$447,500
Reserves	$950,000
Other Costs	$2,007,800
Developer Fee	$9,500,000
Commercial Costs	$0
Total	**$75,243,950**

Residential

Construction Cost Per Square Foot:	$336
Per Unit Cost:	$643,111
Estimated Hard Per Unit Cost:	$217,231
True Cash Per Unit Cost*:	$524,230
Bond Allocation Per Unit:	$341,880
Bond Allocation Per Restricted Rental Unit:	$533,333

Construction Financing

Source	Amount
Citibank, N.A.: Tax-Exempt	$40,000,000
Citibank, N.A.: Recycled Tax-Exempt	$7,000,000
Citibank, N.A.: Taxable	$6,000,000
Seller Carryback	$4,990,000
Deferred Costs	$471,206
Deferred Developer Fee	$8,918,996
Tax Credit Equity	$7,863,748

Permanent Financing

Source	Amount
Citibank, N.A.: Tax-Exempt	$29,541,951
Seller Carryback	$4,990,000
Deferred Developer Fee	$8,918,996
Tax Credit Equity	$31,793,003
TOTAL	**$75,243,950**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$50,022,234
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$23,275,682
Applicable Fraction:	100.00%
Qualified Basis:	$65,028,904
Qualified Basis (Acquisition):	$23,275,682
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$2,601,156
Maximum Annual Federal Credit, Acquisition:	$931,027
Total Maximum Annual Federal Credit:	$3,532,183
Approved Developer Fee (in Project Cost & Eligible Basis):	$9,500,000
Federal Tax Credit Factor:	$0.90010

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,110. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,725 on agreement of the permanent lender and equity investor.

This project has senior housing in combination with non-senior housing. The applicant has provided a third-party legal opinion stating that the project complies with fair housing law, per CTCAC Regulations Section 10322(h)(34).

The reservation of tax credits is contingent upon verification of the rental subsidy annual amount, number of units receiving assistance, term, and expiration date by the bond issuance deadline.

This project will include the adaptive reuse of an existing 2-story office building. Upon completion, the project will include 116 LIHTC units and 1 manager’s unit.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 85.776%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 712 Seagaze, located at 712 Seagaze Drive in Oceanside on a 0.36 acre site, requested and is being recommended for a reservation of $4,199,366 in annual federal tax credits and $46,070,813 of tax-exempt bond cap to finance the new construction of 179 units of housing, consisting of 177 restricted rental units and 2 unrestricted manager's units. The project will have 179 studio units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in August 2025 and be completed in March 2025. The project will be developed by Elsey Holdings LLC and will be located in Senate District 38 and Assembly District 74.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number CA-24-680

Project Name 712 Seagaze
- Site Address: 712 Seagaze Drive, Oceanside, CA 92054
- County: San Diego
- Census Tract: 184.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,199,366	$0
Recommended:	$4,199,366	$0

Tax-Exempt Bond Allocation
- Recommended: $46,070,813

CTCAC Applicant Information
- CTCAC Applicant/CDLAC Sponsor: 716 Seagaze Affordable, L.P.
- Contact: Marc Welk
- Address: 2021 Vanesta Place- Suite A, Manhattan, KS 66503
- Phone: 619-890-9355
- Email: marc@theprimecompany.com

Bond Financing Information
- CDLAC Applicant/Bond Issuer: California Municipal Finance Authority
- Bond Counsel: Anzel Galvan LLP
- Private Placement Purchaser: Citibank, N.A.

Development Team
- General Partner(s) or Principal Owner(s): PSCDC Prime SD LLC; 716 Seagaze LLC
- General Partner Type: Joint Venture
- Parent Company(ies): Pacific Southwest Community Development Corporation; Elsey Holdings LLC
- Developer: Elsey Holdings LLC
- Investor/Consultant: Redstone Equity Partners
- Management Agent: Barker Management

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	179	
No. / % of Low Income Units:	177	100.00%
Average Targeted Affordability:	49.93%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	San Diego County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	45	25%
50% AMI:	43	24%
60% AMI:	89	50%

Unit Mix

179	SRO/Studio Units
179	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
45	SRO/Studio	30%	$795
43	SRO/Studio	50%	$1,326
89	SRO/Studio	60%	$1,591
2	SRO/Studio	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$4,836,478
Construction Costs	$52,188,820
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,673,865
Soft Cost Contingency	$450,000
Relocation	$0
Architectural/Engineering	$2,285,810
Const. Interest, Perm. Financing	$12,601,961
Legal Fees	$294,710
Reserves	$1,256,900
Other Costs	$3,390,445
Developer Fee	$10,534,580
Commercial Costs	$0
Total	**$90,513,569**

Residential

Construction Cost Per Square Foot:	$580
Per Unit Cost:	$505,662
Estimated Hard Per Unit Cost:	$252,903
True Cash Per Unit Cost*:	$480,894
Bond Allocation Per Unit:	$257,379
Bond Allocation Per Restricted Rental Unit:	$260,287

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$46,070,813
Citibank: Taxable	$31,267,978
Tax Credit Equity	$3,652,494
Deferred Costs	$9,622,284

Permanent Financing

Source	Amount
Citibank	$11,580,000
HCD: AHSC	$35,000,000
General Partner Contribution	$2,975,091
Deferred Developer Fee	$4,433,541
Tax Credit Equity	$36,524,937
TOTAL	**$90,513,569**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$80,788,354
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$105,024,860
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,199,366
Approved Developer Fee (in Project Cost & Eligible Basis):	$10,534,580
Federal Tax Credit Factor:	$0.86977

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 99.140%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Walnut Apartments, located at 3020 Fostoria Way in Danville on a 0.75 acre site, requested and is being recommended for a reservation of $1,032,912 in annual federal tax credits and $12,750,000 of tax-exempt bond cap to finance the new construction of 44 units of housing, consisting of 43 restricted rental units and 1 unrestricted manager's unit. The project will have 20 one-bedroom units, 12 two-bedroom units, and 12 three-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 7 and Assembly District 16.

Project Number	CA-24-681
Project Name	Walnut Apartments
Site Address:	3020 Fostoria Way Danville, CA 94526
County:	Contra Costa
Census Tract:	3451.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,032,912	$0
Recommended:	$1,032,912	$0

Tax-Exempt Bond Allocation

Recommended:	$12,750,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Danville Pacific Associates, LP
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	208.461.0022
Email:	calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority (CMFA)
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	California Bank & Trust

Development Team

General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	Infinity Management & Investments, LLC

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	2	
Total # of Units:	44	
No. / % of Low Income Units:	43	100.00%
Average Targeted Affordability:	59.77%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	East Bay Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	5	12%
50% AMI:	5	12%
60% AMI:	14	33%
70% AMI*:	19	44%

*CTCAC restricted only

Unit Mix

20	1-Bedroom Units
12	2-Bedroom Units
12	3-Bedroom Units
44	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
3	1 Bedroom	30%	$876
3	1 Bedroom	50%	$1,460
6	1 Bedroom	60%	$1,752
8	1 Bedroom	70%	$2,044
1	2 Bedrooms	30%	$1,051
1	2 Bedrooms	50%	$1,752
7	2 Bedrooms	60%	$2,103
3	2 Bedrooms	70%	$2,453
1	3 Bedrooms	30%	$1,214
1	3 Bedrooms	50%	$2,024
1	3 Bedrooms	60%	$2,429
8	3 Bedrooms	70%	$2,834
1	3 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$3,489,000
Construction Costs	$11,964,020
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$700,000
Soft Cost Contingency	$370,000
Relocation	$0
Architectural/Engineering	$940,000
Const. Interest, Perm. Financing	$1,738,900
Legal Fees	$140,000
Reserves	$362,076
Other Costs	$1,601,497
Developer Fee	$2,590,917
Commercial Costs	$0
Total	**$23,896,410**

Residential	
Construction Cost Per Square Foot:	$303
Per Unit Cost:	$543,100
Estimated Hard Per Unit Cost:	$235,020
True Cash Per Unit Cost*:	$541,034
Bond Allocation Per Unit:	$289,773
Bond Allocation Per Restricted Rental Unit:	$531,250

Construction Financing

Source	Amount
CB&[1]T: Tax-Exempt	$12,750,000
Bonneville: Tax-Exempt	$4,200,000
Value of Land Donation	$3,079,900
Deferred Costs	$362,076
Deferred Developer Fee	$2,590,917
Tax Credit Equity	$913,517

Permanent Financing

Source	Amount
CB&T[1]: Tax-Exempt	$7,850,000
Bonneville: Tax-Exempt	$4,200,000
Value of Land Donation	$3,079,900
Deferred Developer Fee	$90,917
Tax Credit Equity	$8,675,593
TOTAL	**$23,896,410**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]California Bank & Trust

Determination of Credit Amount(s)

Requested Eligible Basis:	$19,863,699
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$25,822,809
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,032,912
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,590,917
Federal Tax Credit Factor:	$0.83992

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

The applicant requested and was granted a waiver for the recreational facilities requirement for children ages 2-12 under CTCAC Regulation Section 10325(g)(1)(D). The applicant has demonstrated availability of play or recreational facilities suitable for children ages 2-12 in the form of a nearby and readily accessible public park with recreational facilities adjacent to the proposed project.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 100.315%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Via Vail Village, located at Via Vail between Key Largo & Monterey Avenues in Rancho Mirage on a 10.0 acre site, requested and is being recommended for a reservation of $5,097,847 in annual federal tax credits and $57,000,000 of tax-exempt bond cap to finance the new construction of 236 units of housing, consisting of 234 restricted rental units and 2 unrestricted manager's units. The project will have 100 one-bedroom units, 62 two-bedroom units, and 74 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 18 and Assembly District 47.

Project Number CA-24-683

Project Name Via Vail Village
Site Address: Via Vail between Key Largo & Monterey Avenues
Rancho Mirage, CA 92270
County: Riverside
Census Tract: 449.21

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,097,847	$0
Recommended:	$5,097,847	$0

Tax-Exempt Bond Allocation
Recommended: $57,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Rancho Mirage Pacific Associates, LP
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	208.461.0022
Email:	calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority (CMFA)
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	15	
Total # of Units:	236	
No. / % of Low Income Units:	234	100.00%
Average Targeted Affordability:	59.92%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Daisy Andrade
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	58	25%
50% AMI:	50	21%
60% AMI:	15	6%
80% AMI*:	111	47%

*CTCAC restricted only

Unit Mix

100	1-Bedroom Units
62	2-Bedroom Units
74	3-Bedroom Units
236	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
40	1 Bedroom	30%	$576
40	1 Bedroom	50%	$961
10	1 Bedroom	60%	$1,153
10	1 Bedroom	80%	$1,538
16	2 Bedrooms	30%	$691
8	2 Bedrooms	50%	$1,152
3	2 Bedrooms	60%	$1,383
33	2 Bedrooms	80%	$1,844
2	3 Bedrooms	30%	$799
2	3 Bedrooms	50%	$1,332
2	3 Bedrooms	60%	$1,599
68	3 Bedrooms	80%	$2,132
2	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$7,580,270
Construction Costs	$63,633,683
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,300,000
Soft Cost Contingency	$500,005
Relocation	$0
Architectural/Engineering	$990,000
Const. Interest, Perm. Financing	$8,631,200
Legal Fees	$190,000
Reserves	$1,072,527
Other Costs	$7,242,279
Developer Fee	$12,835,466
Commercial Costs	$0
Total	**$105,975,430**

Residential

Construction Cost Per Square Foot:	$311
Per Unit Cost:	$449,048
Estimated Hard Per Unit Cost:	$232,408
True Cash Per Unit Cost*:	$414,048
Bond Allocation Per Unit:	$241,525
Bond Allocation Per Restricted Rental Unit:	$463,415

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$57,000,000
Citibank: Taxable	$3,018,188
Bonneville: Recycled Tax-Exempt	$19,700,000
RMHA[1]: Land	$5,900,000
Fee Waiver	$369,720
Deferred Fees	$1,797,766
Deferred Costs	$1,072,527
Deferred Developer Fee	$12,835,466
Tax Credit Equity	$4,281,763

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$27,500,000
Bonneville: Recycled Tax-Exempt	$19,700,000
RMHA[1]: Land	$5,900,000
Fee Waiver	$369,720
Deferred Fees	$1,797,766
Deferred Developer Fee	$7,890,311
Tax Credit Equity	$42,817,633
TOTAL	**$105,975,430**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Rancho Mirage Housing Authority

Determination of Credit Amount(s)

Requested Eligible Basis:	$98,035,522
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$127,446,179
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,097,847
Approved Developer Fee (in Project Cost & Eligible Basis):	$12,835,466
Federal Tax Credit Factor:	$0.83992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $4,700. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $4,463 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 94.999%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Twin Park Landing, located at 6670 Reseda Boulevard in Los Angeles on a 1.43 acre site, requested and is being recommended for a reservation of $6,395,668 in annual federal tax credits and $68,000,000 of tax-exempt bond cap to finance the new construction of 275 units of housing, consisting of 272 restricted rental units and 3 unrestricted manager's units. The project will have 275 one-bedroom units, serving tenants with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 20 and Assembly District 46.

Project Number	CA-24-684

Project Name	Twin Park Landing
Site Address:	6670 Reseda Boulevard Los Angeles, CA 91335
County:	Los Angeles
Census Tract:	1327.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$6,395,668	$0
Recommended:	$6,395,668	$0

Tax-Exempt Bond Allocation	
Recommended:	$68,000,000

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	Los Angeles Reseda Pacific Associates, LP
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	208.461.0022
Email:	calebr@tpchousing.com

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority (CMFA)
Bond Counsel:	Orrick, LHerrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team	
General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	2	
Total # of Units:	275	
No. / % of Low Income Units:	272	100.00%
Average Targeted Affordability:	57.75%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	28	10%
50% AMI:	28	10%
60% AMI:	105	39%
70% AMI*:	111	41%

*CTCAC restricted only

Unit Mix

275 1-Bedroom Units
275 Total Units

Unit Type & Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
28 1 Bedroom	30%	$780
28 1 Bedroom	50%	$1,300
105 1 Bedroom	60%	$1,560
111 1 Bedroom	70%	$1,679
3 1 Bedroom	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$1,705,000
Construction Costs	$82,403,819
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,300,000
Soft Cost Contingency	$1,450,000
Relocation	$0
Architectural/Engineering	$3,190,000
Const. Interest, Perm. Financing	$11,524,300
Legal Fees	$180,000
Reserves	$1,664,984
Other Costs	$5,800,136
Developer Fee	$14,800,000
Commercial Costs	$0
Total	**$127,018,239**

Residential

Construction Cost Per Square Foot:	$432
Per Unit Cost:	$461,885
Estimated Hard Per Unit Cost:	$270,484
True Cash Per Unit Cost*:	$429,885
Bond Allocation Per Unit:	$247,273
Bond Allocation Per Restricted Rental Unit:	$422,360

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$68,000,000
Citibank: Taxable	$9,181,431
Bonneville: Recycled Tax-Exempt	$28,000,000
Deferred Costs	$1,664,984
Deferred Developer Fee	$14,800,000
Tax Credit Equity	$5,371,824

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$36,500,000
Bonneville: Recycled Tax-Exempt	$28,000,000
Deferred Developer Fee	$8,800,000
Tax Credit Equity	$53,718,239
TOTAL	**$127,018,239**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$122,993,608
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$159,891,690
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$6,395,668
Approved Developer Fee (in Project Cost & Eligible Basis):	$14,800,000
Federal Tax Credit Factor:	$0.83992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,300. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $5,420 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	0
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
Total Points	120	110	109

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: 86.306%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Sunnydale HOPE SF Block 9, located at 1652 Sunnydale Avenue in San Francisco on a 1.2 acre site, requested and is being recommended for a reservation of $5,399,955 in annual federal tax credits and $57,075,000 of tax-exempt bond cap to finance the new construction of 95 units of housing, consisting of 94 restricted rental units and 1 unrestricted manager's unit. The project will have 10 one-bedroom units, 51 two-bedroom units, 23 three-bedroom units, and 11 four-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in April 2027. The project will be developed by Related Irvine Development Company and will be located in Senate District 11 and Assembly District 17.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-686

Project Name	Sunnydale HOPE SF Block 9
Site Address:	1652 Sunnydale Avenue San Francisco, CA 94134
County:	San Francisco
Census Tract:	605.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,399,955	$0
Recommended:	$5,399,955	$0

Tax-Exempt Bond Allocation	
Recommended:	$57,075,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Sunnydale Block 9 Housing Partners, L.P.
Contact:	Ann Silverberg
Address:	44 Montgomery Street, Suite 1310 San Francisco, CA 94104
Phone:	(415) 677-4009
Email:	asilverberg@related.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	City and County of San Francisco
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Related/Sunnydale Block 9 Development Co., LLC Sunnydale Block 9 LLC
General Partner Type:	Joint Venture
Parent Company(ies):	The Related Companies of California, LLC Mercy Housing Calwest
Developer:	Related Irvine Development Company
Investor/Consultant:	California Housing Partnership Corporation
Management Agent:	Mercy Housing Management Group

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	95	
No. / % of Low Income Units:	94	100.00%
Average Targeted Affordability:	39.50%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (71 Units - 76%)	

Information

Housing Type:	Large Family
Geographic Area:	San Francisco County
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Danielle Stevenson
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	12	13%
50% AMI:	59	63%
60% AMI:	23	24%

Unit Mix

10	1-Bedroom Units
51	2-Bedroom Units
23	3-Bedroom Units
11	4-Bedroom Units
95	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
3	1 Bedroom	30%	$1,101
1	1 Bedroom	50%	$1,499
6	1 Bedroom	60%	$1,836
8	2 Bedrooms	30%	$1,322
28	2 Bedrooms	50%	$1,686
15	2 Bedrooms	60%	$2,203
1	3 Bedrooms	30%	$1,527
19	3 Bedrooms	50%	$1,873
2	3 Bedrooms	60%	$2,545
11	4 Bedrooms	50%	$2,023
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$20,001
Construction Costs	$78,625,075
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,931,254
Soft Cost Contingency	$635,432
Relocation	$0
Architectural/Engineering	$2,977,949
Const. Interest, Perm. Financing	$13,630,691
Legal Fees	$315,000
Reserves	$946,000
Other Costs	$3,263,500
Developer Fee	$8,250,000
Commercial Costs	$0
Total	**$112,594,902**

Residential

Construction Cost Per Square Foot:	$920
Per Unit Cost:	$1,185,209
Estimated Hard Per Unit Cost:	$746,031
True Cash Per Unit Cost*:	$1,155,698
Bond Allocation Per Unit:	$600,789
Bond Allocation Per Restricted Rental Unit:	$607,181

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$57,075,000
Citibank: Taxable	$15,453,890
SF MOHCD[1]	$27,250,000
SF MOHCD[1]: Accrued Interest	$1,287,011
Deferred Costs	$3,736,715
Deferred Developer Fee	$2,803,570
Tax Credit Equity	$4,988,716

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$29,124,000
SF MOHCD[1]	$27,250,000
SF MOHCD[1]: Accrued Interest	$1,287,011
Deferred Developer Fee	$2,803,570
Tax Credit Equity	$52,130,321
TOTAL	**$112,594,902**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]San Francisco Mayor's Office of Housing and Community Development

Determination of Credit Amount(s)

Requested Eligible Basis:	$103,845,283
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$134,998,868
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,399,955
Approved Developer Fee (in Project Cost & Eligible Basis):	$8,250,000
Federal Tax Credit Factor:	$0.96538

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 $1,155,698. The applicant noted that the per unit cost is attributed to the larger unit sizes, existing parking commitments, prevailing wage requirements, specific Small Business Enterprise (SBE) and hyperlocal SBE goals, public housing hiring goals, and the project's location in San Francisco.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 140.166%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Rovina Lane Apartments, located at 2 Rovina Lane in Petaluma on a 1.0 acre site, requested and is being recommended for a reservation of $1,014,621 in annual federal tax credits and $11,250,000 of tax-exempt bond cap to finance the new construction of 32 units of housing, consisting of 31 restricted rental units and 1 unrestricted manager's unit. The project will have 10 one-bedroom units, 10 two-bedroom units, and 12 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2026. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 3 and Assembly District 12.

Project Number CA-24-690

Project Name Rovina Lane Apartments
Site Address: 2 Rovina Lane
Petaluma, CA 94952
County: Sonoma
Census Tract: 1507.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,014,621	$0
Recommended:	$1,014,621	$0

Tax-Exempt Bond Allocation
Recommended: $11,250,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Petaluma Pacific Associates, LP
Contact: Caleb Roope
Address: 430 East State Street, Suite 100
Eagle, ID 83616
Phone: 208.461.0022
Email: calebr@tpchousing.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: California Municipal Finance Authority (CMFA)
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: California Bank & Trust

Development Team
General Partner(s) or Principal Owner(s): Central Valley Coalition for Affordable Housing
TPC Holdings IX, LLC
General Partner Type: Joint Venture
Parent Company(ies): Central Valley Coalition for Affordable Housing
The Pacific Companies
Developer: Pacific West Communities, Inc.
Investor/Consultant: Boston Financial
Management Agent: Buckingham Property Management

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	2	
Total # of Units:	32	
No. / % of Low Income Units:	31	100.00%
Average Targeted Affordability:	60.00%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	Northern Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	9	29%
50% AMI:	3	10%
60% AMI:	4	13%
80% AMI*:	15	48%

*CTCAC restricted only

Unit Mix

10 1-Bedroom Units
10 2-Bedroom Units
12 3-Bedroom Units
32 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
7	1 Bedroom	30%	$778
1	1 Bedroom	50%	$1,297
1	1 Bedroom	60%	$1,557
1	1 Bedroom	80%	$2,076
1	2 Bedrooms	30%	$933
1	2 Bedrooms	50%	$1,556
2	2 Bedrooms	60%	$1,867
5	2 Bedrooms	80%	$2,490
1	3 Bedrooms	30%	$1,078
1	3 Bedrooms	50%	$1,798
1	3 Bedrooms	60%	$2,157
9	3 Bedrooms	80%	$2,877
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,226,788
Construction Costs	$12,128,272
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$700,000
Soft Cost Contingency	$300,000
Relocation	$0
Architectural/Engineering	$940,000
Const. Interest, Perm. Financing	$1,790,600
Legal Fees	$140,000
Reserves	$295,389
Other Costs	$1,005,880
Developer Fee	$2,545,035
Commercial Costs	$0
Total	**$21,071,964**

Residential	
Construction Cost Per Square Foot:	$304
Per Unit Cost:	$658,499
Estimated Hard Per Unit Cost:	$326,878
True Cash Per Unit Cost*:	$606,936
Bond Allocation Per Unit:	$351,563
Bond Allocation Per Restricted Rental Unit:	$703,125

Construction Financing

Source	Amount
CA Bank & Trust: Tax-Exempt	$11,250,000
CA Bank & Trust: Taxable	$1,129,344
Bonneville: Recycled Tax-Exempt	$5,000,000
Deferred Costs	$295,389
Deferred Developer Fee	$2,545,035
Tax Credit Equity	$852,196

Permanent Financing

Source	Amount
CA Bank & Trust: Tax-Exempt	$5,900,000
Bonneville: Recycled Tax-Exempt	$5,000,000
Deferred Developer Fee	$1,650,000
Tax Credit Equity	$8,521,964
TOTAL	**$21,071,964**

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

Determination of Credit Amount(s)	
Requested Eligible Basis:	$19,511,936
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$25,365,517
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,014,621
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,545,035
Federal Tax Credit Factor:	$0.83992

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 62.241%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Pacific Crest Commons, located at 10077 State Highway 89 South in Truckee on a 1.75 acre site, requested and is being recommended for a reservation of $1,942,919 in annual federal tax credits and $21,000,000 of tax-exempt bond cap to finance the new construction of 55 units of housing, consisting of 54 restricted rental units and 1 unrestricted manager's unit. The project will have 11 studio units, 16 one-bedroom units, 14 two-bedroom units, and 14 three-bedroom units, serving families with rents affordable to households earning 20%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 1 and Assembly District 1.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH), Infill Infrastructure Grant (IIG) and Local Government Matching Grant (LGMG) programs of HCD.

Project Number CA-24-691

Project Name Pacific Crest Commons

Site Address:	10077 State Highway 89 South Truckee, CA 96161
County:	Nevada
Census Tract:	12.09

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,942,919	$0
Recommended:	$1,942,919	$0

Tax-Exempt Bond Allocation

Recommended:	$21,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Truckee Pacific Crest Associates, a California Limited Partnership
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	208.461.0022
Email:	calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority (CMFA)
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	California Bank & Trust

Development Team

General Partner(s) or Principal Owner(s):	Building Better Partnerships, Inc. TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Building Better Partnerships, Inc. The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	Cambridge Real Estate Services

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	2	
Total # of Units:	55	
No. / % of Low Income Units:	54	100.00%
Average Targeted Affordability:	59.65%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (10 Units - 19%)	

Information

Housing Type:	Large Family
Geographic Area:	N/A
State Ceiling Pool:	N/A
Set Aside:	N/A
Homeless Set Aside Units:	10
CDLAC Project Analyst:	Daisy Andrade
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	10	19%
50% AMI:	6	11%
60% AMI:	16	30%
80% AMI*:	22	41%

*CTCAC restricted only

Unit Mix

11 SRO/Studio Units
16 1-Bedroom Units
14 2-Bedroom Units
14 3-Bedroom Units
55 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	SRO/Studio	20%	$365
1	SRO/Studio	50%	$912
1	SRO/Studio	60%	$1,095
4	SRO/Studio	80%	$1,460
5	1 Bedroom	20%	$391
2	1 Bedroom	50%	$977
2	1 Bedroom	60%	$1,173
6	1 Bedroom	80%	$1,564
2	2 Bedrooms	50%	$1,172
6	2 Bedrooms	60%	$1,407
6	2 Bedrooms	80%	$1,876
1	3 Bedrooms	50%	$1,355
7	3 Bedrooms	60%	$1,626
6	3 Bedrooms	80%	$2,168
1	1 Bedroom	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,619,705
Construction Costs	$24,991,340
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,300,000
Soft Cost Contingency	$350,000
Relocation	$0
Architectural/Engineering	$985,000
Const. Interest, Perm. Financing	$2,128,400
Legal Fees	$170,000
Reserves	$377,290
Other Costs	$2,261,212
Developer Fee	$4,873,543
Commercial Costs	$0
Total	**$40,056,490**

Residential

Construction Cost Per Square Foot:	$384
Per Unit Cost:	$728,300
Estimated Hard Per Unit Cost:	$390,822
True Cash Per Unit Cost*:	$646,482
Bond Allocation Per Unit:	$381,818
Bond Allocation Per Restricted Rental Unit:	$656,250

Construction Financing

Source	Amount
CB&T[1]: Tax-Exempt	$21,000,000
CB&T[1]: Taxable	$7,324,634
CA DGS[2]: Ground Lease	$1,760,000
HCD: IIG	$1,089,134
Town of Truckee	$1,000,000
Regional Housing Authority	$1,000,000
Deferred Cost	$377,290
Deferred Developer Fee	$4,873,543
Tax Credit Equity	$1,631,889

Permanent Financing

Source	Amount
CB&T[1]: Tax-Exempt	$6,700,000
CA DGS[2]: Ground Lease	$1,760,000
HCD: IIG	$1,089,134
HCD: LGMG	$5,000,000
HCD: NPLH	$2,688,468
Town of Truckee	$1,000,000
Regional Housing Authority	$1,000,000
Deferred Developer Fee	$4,500,000
Tax Credit Equity	$16,318,888
TOTAL	**$40,056,490**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]California Bank & Trust
[2]California Department of General Services

Determination of Credit Amount(s)

Requested Eligible Basis:	$37,363,833
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$48,572,983
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,942,919
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,873,543
Federal Tax Credit Factor:	$0.83992

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 $646,482 per unit. The applicant noted that the per unit cost is attributed to structural requirements, limited subcontractors, limited building season and prevailing wages.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 55.299%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Kensington Apartments, located at Washington Avenue and Magnolia Street in Murrieta on a 4.7 acre site, requested and is being recommended for a reservation of $2,559,831 in annual federal tax credits and $28,500,000 of tax-exempt bond cap to finance the new construction of 126 units of housing, consisting of 125 restricted rental units and 1 unrestricted manager's unit. The project will have 48 one-bedroom units, 42 two-bedroom units, and 36 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 32 and Assembly District 71.

Project Number CA-24-700

Project Name Kensington Apartments
Site Address: Washington Avenue and Magnolia Street
Murrieta, CA 92562
County: Riverside
Census Tract: 506.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,559,831	$0
Recommended:	$2,559,831	$0

Tax-Exempt Bond Allocation
Recommended: $28,500,000

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Murrieta Pacific Associates, a California Limited Partnership
Contact: Caleb Roope
Address: 430 East State Street, Suite 100
Eagle, ID 83616
Phone: 208.461.0022
Email: calebr@tpchousing.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: California Municipal Finance Authority (CMFA)
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	126	
No. / % of Low Income Units:	125	100.00%
Average Targeted Affordability:	59.93%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	N/A
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	29	23%
50% AMI:	32	26%
60% AMI:	5	4%
80% AMI*:	59	47%

*CTCAC restricted only

Unit Mix

48	1-Bedroom Units
42	2-Bedroom Units
36	3-Bedroom Units
126	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
20	1 Bedroom	30%	$576
24	1 Bedroom	50%	$961
3	1 Bedroom	60%	$1,153
1	1 Bedroom	80%	$1,538
8	2 Bedrooms	30%	$691
7	2 Bedrooms	50%	$1,152
1	2 Bedrooms	60%	$1,383
25	2 Bedrooms	80%	$1,844
1	3 Bedrooms	30%	$799
1	3 Bedrooms	50%	$1,332
1	3 Bedrooms	60%	$1,599
33	3 Bedrooms	80%	$2,132
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,576,673
Construction Costs	$30,959,515
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,700,000
Soft Cost Contingency	$380,000
Relocation	$0
Architectural/Engineering	$790,000
Const. Interest, Perm. Financing	$4,187,550
Legal Fees	$160,000
Reserves	$634,243
Other Costs	$5,361,968
Developer Fee	$6,528,263
Commercial Costs	$0
Total	**$53,278,212**

Residential

Construction Cost Per Square Foot:	$303
Per Unit Cost:	$422,843
Estimated Hard Per Unit Cost:	$212,189
True Cash Per Unit Cost*:	$387,065
Bond Allocation Per Unit:	$226,190
Bond Allocation Per Restricted Rental Unit:	$431,818

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$28,500,000
Citibank: Taxable	$1,973,390
Bonneville: Recycled Tax-Exempt	$8,000,000
County of Riverside	$2,900,000
City of Murrieta	$1,769,773
Fee Waiver	$822,500
Deferred Costs	$634,243
Deferred Developer Fee	$6,528,263
Tax Credit Equity	$2,150,043

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$14,600,000
Bonneville: Recycled Tax-Exempt	$8,000,000
County of Riverside	$2,900,000
City of Murrieta	$1,769,773
Fee Waiver	$822,500
Deferred Developer Fee	$3,685,509
Tax Credit Equity	$21,500,430
TOTAL	**$53,278,212**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$49,227,519
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$63,995,775
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,559,831
Approved Developer Fee (in Project Cost & Eligible Basis):	$6,528,263
Federal Tax Credit Factor:	$0.83992

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

This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $4,700. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $4,592 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 110.645%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Broadway Meadows, located at 1301 Broadway in Millbrae on a 0.67 acre site, requested and is being recommended for a reservation of $4,290,469 in annual federal tax credits and $46,000,000 of tax-exempt bond cap to finance the new construction of 97 units of housing, consisting of 96 restricted rental units and 1 unrestricted manager's unit. The project will have 30 studio units, 10 one-bedroom units, 30 two-bedroom units, and 27 three-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 13 and Assembly District 21.

Project Number	CA-24-703
Project Name	Broadway Meadows
Site Address:	1301 Broadway Millbrae, CA 94030
County:	San Mateo
Census Tract:	6044.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,290,469	$0
Recommended:	$4,290,469	$0

Tax-Exempt Bond Allocation

Recommended:	$46,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Millbrae Broadway Pacific Associates, LP
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	208.461.0022
Email:	calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority (CMFA)
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	97	
No. / % of Low Income Units:	96	100.00%
Average Targeted Affordability:	58.62%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	South and West Bay Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	20	21%
50% AMI:	5	5%
60% AMI:	7	7%
70% AMI*:	64	67%

*CTCAC restricted only

Unit Mix

30	SRO/Studio Units
10	1-Bedroom Units
30	2-Bedroom Units
27	3-Bedroom Units
97	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
17	SRO/Studio	30%	$1,028
2	SRO/Studio	50%	$1,713
4	SRO/Studio	60%	$2,056
7	SRO/Studio	70%	$2,134
1	1 Bedroom	30%	$1,101
1	1 Bedroom	50%	$1,836
1	1 Bedroom	60%	$2,203
7	1 Bedroom	70%	$2,570
1	2 Bedrooms	30%	$1,322
1	2 Bedrooms	50%	$2,203
1	2 Bedrooms	60%	$2,644
26	2 Bedrooms	70%	$2,968
1	3 Bedrooms	30%	$1,527
1	3 Bedrooms	50%	$2,545
1	3 Bedrooms	60%	$3,054
24	3 Bedrooms	70%	$3,563
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$2,596,750
Construction Costs	$53,484,421
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,700,000
Soft Cost Contingency	$600,000
Relocation	$0
Architectural/Engineering	$1,090,000
Const. Interest, Perm. Financing	$7,768,850
Legal Fees	$225,000
Reserves	$986,028
Other Costs	$7,033,169
Developer Fee	$9,800,000
Commercial Costs	$0
Total	**$86,284,218**

Residential

Construction Cost Per Square Foot:	$590
Per Unit Cost:	$889,528
Estimated Hard Per Unit Cost:	$476,981
True Cash Per Unit Cost*:	$832,849
Bond Allocation Per Unit:	$474,227
Bond Allocation Per Restricted Rental Unit:	$1,437,500

Construction Financing

Source	Amount
Citibank, N.A.: Tax-Exempt	$46,000,000
Citibank, N.A.: Taxable	$4,894,556
Bonneville: Recycled Tax-Exempt	$21,000,000
Deferred Costs	$986,028
Deferred Developer Fee	$9,800,000
Tax Credit Equity	$3,603,634

Permanent Financing

Source	Amount
Citibank, N.A.: Tax-Exempt	$23,750,000
Bonneville: Recycled Tax-Exempt	$21,000,000
Deferred Developer Fee	$5,497,883
Tax Credit Equity	$36,036,335
TOTAL	**$86,284,218**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$82,509,020
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$107,261,726
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,290,469
Approved Developer Fee (in Project Cost & Eligible Basis):	$9,800,000
Federal Tax Credit Factor:	$0.83992

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 $832,849. The applicant noted that the per unit cost is attributed to local impact and permitting fees, the project's location in the high-cost Bay Area, podium parking, and the relatively small size of the development, which limits economies of scale.

This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $6,800. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $6,173 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 70.963%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Avenue 44 Apartments, located at Avenue 44 & Golf Center Parkway in Indio on a 6.06 acre site, requested and is being recommended for a reservation of $3,543,061 in annual federal tax credits and $39,000,000 of tax-exempt bond cap to finance the new construction of 180 units of housing, consisting of 178 restricted rental units and 2 unrestricted manager's units. The project will have 87 one-bedroom units, 48 two-bedroom units, and 45 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 18 and Assembly District 36.

The project financing includes state funding from the Permanent Local Housing Allocation (PLHA) program of HCD.

Project Number CA-24-705

Project Name Avenue 44 Apartments

Site Address:	Avenue 44 & Golf Center Parkway Indio, CA 92203
County:	Riverside
Census Tract:	453.06

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,543,061	$0
Recommended:	$3,543,061	$0

Tax-Exempt Bond Allocation

Recommended: $39,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Indio Avenue 44 Pacific Associates, a California Limited Partnership
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	208.461.0022
Email:	calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority (CMFA)
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	8	
Total # of Units:	180	
No. / % of Low Income Units:	178	100.00%
Average Targeted Affordability:	59.95%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	29	16%
50% AMI:	18	10%
60% AMI:	79	44%
80% AMI*:	52	29%

*CTCAC restricted only

Unit Mix

87	1-Bedroom Units
48	2-Bedroom Units
45	3-Bedroom Units
180	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
20	1 Bedroom	30%	$576
9	1 Bedroom	50%	$961
56	1 Bedroom	60%	$1,153
2	1 Bedroom	80%	$1,538
5	2 Bedrooms	30%	$691
5	2 Bedrooms	50%	$1,152
19	2 Bedrooms	60%	$1,383
17	2 Bedrooms	80%	$1,844
4	3 Bedrooms	30%	$799
4	3 Bedrooms	50%	$1,332
4	3 Bedrooms	60%	$1,599
33	3 Bedrooms	80%	$2,132
2	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$3,057,615
Construction Costs	$43,840,643
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,500,000
Soft Cost Contingency	$700,000
Relocation	$0
Architectural/Engineering	$1,090,000
Const. Interest, Perm. Financing	$5,604,200
Legal Fees	$180,000
Reserves	$819,385
Other Costs	$5,551,585
Developer Fee	$8,923,961
Commercial Costs	$0
Total	**$72,267,389**

Residential

Construction Cost Per Square Foot:	$310
Per Unit Cost:	$401,485
Estimated Hard Per Unit Cost:	$210,457
True Cash Per Unit Cost*:	$370,575
Bond Allocation Per Unit:	$216,667
Bond Allocation Per Restricted Rental Unit:	$309,524

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$39,000,000
Citibank: Taxable	$4,322,157
Bonneville: Recycled Tax-Exempt	$10,000,000
City of Indio: LMIHAF¹	$2,471,850
City of Indio: Deferred Fees	$1,472,922
County of Riverside: PLHA	$2,000,000
Waived Fee	$281,240
Deferred Cost	$819,385
Deferred Developer Fee	$8,923,961
Tax Credit Equity	$2,975,874

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$21,000,000
Bonneville: Recycled Tax-Exempt	$10,000,000
City of Indio: LMIHAF¹	$2,471,850
City of Indio: Deferred Fees	$1,472,922
County of Riverside: PLHA	$2,000,000
Waived Fee	$281,240
Deferred Developer Fee	$5,282,641
Tax Credit Equity	$29,758,736
TOTAL	**$72,267,389**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
¹LMIHAF: Low and Moderate Income Housing Asset Fund

Determination of Credit Amount(s)

Requested Eligible Basis:	$68,135,795
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$88,576,534
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,543,061
Approved Developer Fee (in Project Cost & Eligible Basis):	$8,923,961
Federal Tax Credit Factor:	$0.83992

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $4,700. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $4,453 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 99.850%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Alvarado Creek Apartments, located at 5901-5913, 5915 & 5927 Mission Gorge Road in San Diego on a 3.84 acre site, requested and is being recommended for a reservation of $7,346,018 in annual federal tax credits and $88,000,000 of tax-exempt bond cap to finance the new construction of 227 units of housing, consisting of 225 restricted rental units and 2 unrestricted manager's units. The project will have 54 studio units, 54 one-bedroom units, 59 two-bedroom units, and 60 three-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 39 and Assembly District 78.

The project financing includes state funding from the Infill Infrastructure Grant (IIG) program of HCD.

Project Number CA-24-706

Project Name Alvarado Creek Apartments

Site Address: 5901-5913, 5915 & 5927 Mission Gorge Road
San Diego, CA 92120
County: San Diego
Census Tract: 96.04

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$7,346,018	$0
Recommended:	$7,346,018	$0

Tax-Exempt Bond Allocation

Recommended: $88,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor: San Diego Pacific Associates, a California Limited Partnership
Contact: Caleb Roope
Address: 430 East State Street, Suite 100
Eagle, ID 83616
Phone: 208.461.0022
Email: calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer: California Municipal Finance Authority (CMFA)
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: Citi Community Capital

Development Team

General Partner(s) or Principal Owner(s):	Central Valley Coalition for Affordable Housing TPC Holdings IX, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Central Valley Coalition for Affordable Housing The Pacific Companies
Investor/Consultant:	Boston Financial
Management Agent:	ConAm Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	227	
No. / % of Low Income Units:	225	100.00%
Average Targeted Affordability:	59.94%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Diego County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	40	18%
50% AMI:	29	13%
60% AMI:	8	4%
70% AMI*:	148	66%

*CTCAC restricted only

Unit Mix

54	SRO/Studio Units
54	1-Bedroom Units
59	2-Bedroom Units
60	3-Bedroom Units
227	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
30	SRO/Studio	30%	$795
20	SRO/Studio	50%	$1,326
2	SRO/Studio	60%	$1,591
2	SRO/Studio	70%	$1,833
6	1 Bedroom	30%	$852
5	1 Bedroom	50%	$1,420
2	1 Bedroom	60%	$1,704
41	1 Bedroom	70%	$1,988
2	2 Bedrooms	30%	$1,023
2	2 Bedrooms	50%	$1,705
2	2 Bedrooms	60%	$2,046
53	2 Bedrooms	70%	$2,387
2	3 Bedrooms	30%	$1,182
2	3 Bedrooms	50%	$1,970
2	3 Bedrooms	60%	$2,364
52	3 Bedrooms	70%	$2,758
2	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$21,271,714
Construction Costs	$91,611,554
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$6,525,000
Soft Cost Contingency	$980,000
Relocation	$0
Architectural/Engineering	$1,490,000
Const. Interest, Perm. Financing	$14,251,600
Legal Fees	$225,000
Reserves	$1,566,004
Other Costs	$7,232,147
Developer Fee	$18,000,000
Commercial Costs	$0
Total	**$163,153,019**

Residential

Construction Cost Per Square Foot:	$398
Per Unit Cost:	$718,736
Estimated Hard Per Unit Cost:	$347,964
True Cash Per Unit Cost*:	$668,747
Bond Allocation Per Unit:	$387,665
Bond Allocation Per Restricted Rental Unit:	$1,142,857

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$88,000,000
Citibank: Taxable	$6,294,339
Bonneville: Recycled Tax- Exempt	$35,000,000
HCD: IIG	$7,470,000
Deferred Costs	$1,566,004
Fee Waiver	$652,638
Deferred Developer Fee	$18,000,000
Tax Credit Equity	$6,170,038

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$45,500,000
Bonneville: Recycled Tax- Exempt	$35,000,000
HCD: IIG	$8,300,000
Fee Waiver	$652,638
Deferred Developer Fee	$12,000,000
Tax Credit Equity	$61,700,381
TOTAL	**$163,153,019**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$141,269,577
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$183,650,450
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$7,346,018
Approved Developer Fee (in Project Cost & Eligible Basis):	$18,000,000
Federal Tax Credit Factor:	$0.83992

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

Development costs are roughly $668,747 per unit. The factors affecting this cost includes the high cost of building in the area, podium parking structure, extensive offsite improvements, a requirement to pay state prevailing wages, and high land cost.

The current legal description is part of a larger site and the project site’s parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-706 must be completed as part of the placed in service package.

This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $5,700. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $4,868 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 93.110%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Livingston B Street, located at Winton Parkway and B Street in Livingston on a 3.95 acre site, requested and is being recommended for a reservation of $1,782,651 in annual federal tax credits and $25,173,657 of tax-exempt bond cap to finance the new construction of 80 units of housing, consisting of 79 restricted rental units and 1 unrestricted manager's unit. The project will have 36 one-bedroom units, 24 two-bedroom units, and 20 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in August 2026. The project will be developed by Self-Help Enterprises and will be located in Senate District 14 and Assembly District 27.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) and Permanent Local Housing Allocation (PLHA) programs of HCD.

Project Number CA-24-716

Project Name Livingston B Street
Site Address: Winton Parkway and B Street
Livingston, CA 95334
County: Merced
Census Tract: 3.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,782,651	$0
Recommended:	$1,782,651	$0

Tax-Exempt Bond Allocation
Recommended: $25,173,657

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Self-Help Enterprises
Contact: Betsy McGovern-Garcia
Address: 8445 West Elowin Court
Visalia, CA 93291
Phone: 559-802-1653
Email: BetsyG@selfhelpenterprises.org

Bond Financing Information
CDLAC Applicant/Bond Issuer: California Municipal Finance Authority
Bond Counsel: Jones Hall, A Professional Law Corporation
Private Placement Purchaser: U.S. Bank National Association

Development Team
General Partner(s) or Principal Owner(s): SHE Livingston B Street LLC
General Partner Type: Nonprofit
Parent Company(ies): Self-Help Enterprises
Developer: Self-Help Enterprises
Investor/Consultant: California Housing Partnership
Management Agent: AWI Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	10	
Total # of Units:	80	
No. / % of Low Income Units:	79	100.00%
Average Targeted Affordability:	46.51%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME - American Resuce Plan (ARP)	

Information

Housing Type:	Large Family
Geographic Area:	Central Valley Region
State Ceiling Pool:	Rural
Set Aside:	N/A
Homeless Set Aside Units:	16
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	16	20%
40% AMI:	8	10%
50% AMI:	40	51%
60% AMI:	15	19%

Unit Mix

36	1-Bedroom Units
24	2-Bedroom Units
20	3-Bedroom Units
80	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
6	1 Bedroom	30%	$495
6	2 Bedrooms	30%	$594
4	3 Bedrooms	30%	$685
4	1 Bedroom	40%	$660
4	2 Bedrooms	40%	$792
18	1 Bedroom	50%	$825
12	2 Bedrooms	50%	$990
10	3 Bedrooms	50%	$1,143
8	1 Bedroom	60%	$937
1	2 Bedrooms	60%	$1,188
6	3 Bedrooms	60%	$1,371
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$2,164,000
Construction Costs	$31,458,757
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,635,083
Soft Cost Contingency	$248,765
Relocation	$0
Architectural/Engineering	$1,005,000
Const. Interest, Perm. Financing	$3,701,443
Legal Fees	$95,000
Reserves	$180,888
Other Costs	$1,487,382
Developer Fee	$5,812,993
Commercial Costs	$0
Total	**$47,789,311**

Residential

Construction Cost Per Square Foot:	$432
Per Unit Cost:	$597,366
Estimated Hard Per Unit Cost:	$373,061
True Cash Per Unit Cost*:	$597,366
Bond Allocation Per Unit:	$314,671
Bond Allocation Per Restricted Rental Unit:	$318,654

Construction Financing

Source	Amount
US Bank: Tax-Exempt	$25,173,657
US Bank: Taxable	$4,559,503
HCD: HOME-ARP	$8,836,587
City of Livingston: PHLA	$438,217
Deferred Costs	$2,246,219
Deferred Developer Fee	$3,312,993
Tax Credit Equity	$3,222,135

Permanent Financing

Source	Amount
US Bank: Tax-Exempt	$1,965,000
HCD: HOME-ARP	$9,818,430
HCD: AHSC	$15,000,000
City of Livingston: PLHA	$438,217
Sponsor Loan: CMF[1]	$500,000
Deferred Developer Fee	$3,312,993
Tax Credit Equity	$16,754,671
TOTAL	**$47,789,311**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Capital Magnet Funds

Determination of Credit Amount(s)

Requested Eligible Basis:	$44,566,284
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$44,566,284
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,782,651
Approved Developer Fee (in Project Cost & Eligible Basis):	$5,812,993
Federal Tax Credit Factor:	$0.93987

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
The current legal description is part of a larger site and the project site's parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-716 must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 99.529%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Sunnydale HOPE SF Block 7, located at 65 Santos Street in San Francisco on a 1.02 acre site, requested and is being recommended for a reservation of $5,121,561 in annual federal tax credits and $53,305,000 of tax-exempt bond cap to finance the new construction of 89 units of housing, consisting of 88 restricted rental units and 1 unrestricted manager's unit. The project will have 13 one-bedroom units, 44 two-bedroom units, 23 three-bedroom units, and 9 four-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Mercy Housing California and will be located in Senate District 11 and Assembly District 17.

The project will be receiving rental assistance in the form of MHSA Rental Assistance. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number	CA-24-719
Project Name	Sunnydale HOPE SF Block 7
Site Address:	65 Santos Street San Francisco, CA 94134
County:	San Francisco
Census Tract:	605.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,121,561	$0
Recommended:	$5,121,561	$0

Tax-Exempt Bond Allocation

Recommended:	$53,305,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Sunnydale Block 7 Housing Partners, L.P.
Contact:	Elizabeth Kuwada
Address:	1256 Market Street San Francisco, CA 94102
Phone:	415-355-7133
Email:	elizabeth.kuwada@mercyhousing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	City and County of San Francisco
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Sunnydale Block 7 LLC Related/Sunnydale Block 7 Development CO,LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Mercy Housing Calwest The Related Companies of California
Developer:	Mercy Housing California
Investor/Consultant:	California Housing Partnership Corporation
Management Agent:	Mercy Housing Management Group

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	89	
No. / % of Low Income Units:	88	100.00%
Average Targeted Affordability:	38.57%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Francisco County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Sabrina Yang

55-Year Use / Affordability

Aggregate Targeting	Number of Units	of Affordable Units
30% AMI:	23	26%
50% AMI:	53	60%
60% AMI:	12	14%

Unit Mix

13	1-Bedroom Units
44	2-Bedroom Units
23	3-Bedroom Units
9	4-Bedroom Units
89	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
5	1 Bedroom	30%	$1,101
13	2 Bedrooms	30%	$1,322
4	3 Bedrooms	30%	$1,527
1	4 Bedrooms	30%	$1,704
4	1 Bedroom	50%	$1,499
19	2 Bedrooms	50%	$1,686
13	3 Bedrooms	50%	$1,874
8	4 Bedrooms	50%	$2,024
3	1 Bedroom	50%	$1,836
4	2 Bedrooms	50%	$2,203
2	3 Bedrooms	50%	$2,545
1	1 Bedroom	60%	$1,836
7	2 Bedrooms	60%	$2,203
4	3 Bedrooms	60%	$2,545
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$10,001
Construction Costs	$74,574,900
Construction Hard Cost Contingency	$3,782,561
Soft Cost Contingency	$567,195
Architectural/Engineering	$2,740,000
Const. Interest, Perm. Financing	$16,409,284
Legal Fees	$175,000
Reserves	$889,064
Other Costs	$3,905,807
Developer Fee	$4,036,468
Total	**$107,090,280**

Residential	
Construction Cost Per Square Foot:	$648
Per Unit Cost:	$1,203,262
Estimated Hard Per Unit Cost:	$754,960
True Cash Per Unit Cost*:	$1,185,998
Bond Allocation Per Unit:	$598,933
Bond Allocation Per Restricted Rental Unit:	$605,739

Construction Financing

Source	Amount
CitiBank: Tax-Exempt	$53,305,000
CitiBank: Taxable	$29,220,305
SF MOHCD[1]	$15,350,000
Accrued Interest	$820,983
Deferred Costs	$2,202,364
Deferred Developer Fee	$1,536,468
Tax Credit Equity	$4,655,160

Permanent Financing

Source	Amount
CitiBank: Tax-Exempt	$22,468,000
HCD: AHSC	$18,500,000
SF MOHCD[1]	$15,350,000
Accrued Interest	$820,983
Deferred Developer Fee	$1,536,468
Tax Credit Equity	$48,414,829
TOTAL	**$107,090,280**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]San Francisco Mayor’s Office of Housing and Community Development

Determination of Credit Amount(s)

Requested Eligible Basis:	$98,491,555
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$128,039,021
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,121,561
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,036,468
Federal Tax Credit Factor:	$0.94531

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 $1,185,998. The applicant stated that construction costs have increased due to all-electric building requirements and prevailing wages.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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

Tie Breaker: 137.413%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

River Grove II, located at 49177 Road 426 in Oakhurst on a 1.81 acre site, requested and is being recommended for a reservation of $1,402,719 in annual federal tax credits and $19,596,237 of tax-exempt bond cap to finance the new construction of 50 units of housing, consisting of 49 restricted rental units and 1 unrestricted manager's unit. The project will have 20 one-bedroom units, 15 two-bedroom units, and 15 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in September 2026. The project will be developed by Self-Help Enterprises and will be located in Senate District 4 and Assembly District 8.

The project financing includes state funding from the Infill Infrastructure Grant (IIG) and Permanent Local Housing Allocation (PLHA) programs of HCD.

Project Number	CA-24-724
Project Name	River Grove II
Site Address:	49177 Road 426 Oakhurst, CA 93644
County:	Madera
Census Tract:	104.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,402,719	$0
Recommended:	$1,402,719	$0

Tax-Exempt Bond Allocation	
Recommended:	$19,596,237

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	River Grove II, L.P.
Contact:	Betsy McGovern-Garcia
Address:	8445 West Elowin Court Visalia, CA 93291
Phone:	559-802-1653
Email:	betsyg@selfhelpenterprises.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	U.S. Bank National Association

Development Team

General Partner(s) or Principal Owner(s):	River Grove II LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Self-Help Enterprises
Developer:	Self-Help Enterprises
Investor/Consultant:	California Housing Partnership
Management Agent:	AWI Management Corporation

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	50	
No. / % of Low Income Units:	49	100.00%
Average Targeted Affordability:	45.91%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME / American Rescue Plan (ARP) / National Housing Trust Fund (NHTF)	

Information

Housing Type:	Large Family
Geographic Area:	Central Valley Region
State Ceiling Pool:	N/A
Set Aside:	N/A
Homeless Set Aside Units:	13
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Sabrina Yang

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	6	12%
40% AMI:	13	27%
50% AMI:	25	51%
60% AMI:	5	10%

Unit Mix

20	1-Bedroom Units
15	2-Bedroom Units
15	3-Bedroom Units
50	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
2	1 Bedroom	30%	$495
2	2 Bedrooms	30%	$594
2	3 Bedrooms	30%	$685
3	1 Bedroom	40%	$660
2	2 Bedrooms	40%	$792
2	3 Bedrooms	40%	$914
3	1 Bedroom	40%	$660
2	2 Bedrooms	40%	$792
1	3 Bedrooms	40%	$914
10	1 Bedroom	50%	$825
7	2 Bedrooms	50%	$990
8	3 Bedrooms	50%	$1,143
2	1 Bedroom	60%	$990
1	2 Bedrooms	60%	$1,188
2	3 Bedrooms	60%	$1,371
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,831,541
Construction Costs	$23,120,211
Construction Hard Cost Contingency	$1,226,011
Soft Cost Contingency	$371,435
Architectural/Engineering	$980,000
Const. Interest, Perm. Financing	$2,866,021
Legal Fees	$150,000
Reserves	$110,672
Other Costs	$1,998,875
Developer Fee	$4,574,084
Total	**$37,228,850**

Residential

Construction Cost Per Square Foot:	$477
Per Unit Cost:	$744,577
Estimated Hard Per Unit Cost:	$416,775
True Cash Per Unit Cost*:	$703,095
Bond Allocation Per Unit:	$391,925
Bond Allocation Per Restricted Rental Unit:	$399,923

Construction Financing

Source	Amount
US Bank: Tax-Exempt	$19,596,237
US Bank: Taxable	$2,767,699
HCD: HOME-ARP	$3,381,286
HCD: IIG	$2,729,400
HCD: NHTF	$2,155,656
Deferred Costs	$2,050,672
Deferred Developer Fee	$2,074,085
Tax Credit Equity	$2,473,816

Permanent Financing

Source	Amount
US Bank	$840,000
HOME	$12,000,000
HCD: HOME-ARP	$3,756,984
HCD: IIG	$2,729,400
HCD: NHTF	$2,661,304
Deferred Developer Fee	$2,074,084
Tax Credit Equity	$13,167,078
TOTAL	**$37,228,850**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$35,067,981
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$35,067,981
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,402,719
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,574,084
Federal Tax Credit Factor:	$0.93868

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 $703,095. The applicant noted that the per unit cost is attributed to prevailing wage requirements, escalating finance costs due to construction loan interest rates, and material costs.

River Grove II is the second phase of the River Grove development. River Grove I, which is currently under construction, features 70 units along with a community building, amenities, and parking that will be shared with River Grove II through a Joint Use Easement agreement. Both phases will be managed and owned by separate limited partnerships, and they will each have their own monitoring requirements. APN 065-080-053 has been split into Parcel 1 (River Grove I) and Parcel 2 (River Grove II). Both parcels currently share the same APN but will be assigned separate APNs upon construction completion. The legal description and APN for CA-24-724 must be completed as part of the placed-in-service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 68.845%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Arrowhead Grove Phase IV, located at 363 Elm Circle in San Bernardino on a 4.59 acre site, requested and is being recommended for a reservation of $3,056,472 in annual federal tax credits and $33,060,500 of tax-exempt bond cap to finance the new construction of 92 units of housing, consisting of 91 restricted rental units and 1 unrestricted manager's unit. The project will have 22 one-bedroom units, 46 two-bedroom units, and 24 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by National Community Renaissance of California and will be located in Senate District 23 and Assembly District 45.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number	CA-24-726
Project Name	Arrowhead Grove Phase IV
Site Address:	363 Elm Circle
	San Bernardino, CA 92410
County:	San Bernardino
Census Tract:	6401.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,056,472	$0
Recommended:	$3,056,472	$0

Tax-Exempt Bond Allocation

Recommended:	$33,060,500

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	National Community Renaissance of California
Contact:	Lesley Hampton
Address:	9692 Haven Ave, Suite 100
	Rancho Cucamonga, CA 91730
Phone:	909-204-3444
Email:	lhampton@nationalcore.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Statewide Communities Development Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Bank of America, N.A.

Development Team

General Partner(s) or Principal Owner(s):	NCRC AG4 MGP LLC
General Partner Type:	Nonprofit
Developer:	National Community Renaissance of California
Investor/Consultant:	Bank of America
Management Agent:	National Community Renaissance of California

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	7
Total # of Units:	92
No. / % of Low Income Units:	91 100.00%
Average Targeted Affordability:	47.75%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HOME / HUD Section 8 Project-based Vouchers (91 Units - 100%)

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Daisy Andrade
CTCAC Project Analyst:	Sabrina Yang

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	23	25%
40% AMI:	17	19%
50% AMI:	19	21%
60% AMI:	11	12%
70% AMI*:	11	12%
80% AMI*:	10	11%

*CTCAC restricted only

Unit Mix

22	1-Bedroom Units
46	2-Bedroom Units
24	3-Bedroom Units
92	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
6	1 Bedroom	30%	$480
12	2 Bedrooms	30%	$575
5	3 Bedrooms	30%	$666
3	1 Bedroom	40%	$576
5	2 Bedrooms	40%	$691
1	3 Bedrooms	40%	$799
8	3 Bedrooms	40%	$1,066
3	1 Bedroom	50%	$961
11	2 Bedrooms	50%	$1,152
5	3 Bedrooms	50%	$1,332
2	1 Bedroom	60%	$1,153
9	2 Bedrooms	60%	$1,382
5	1 Bedroom	70%	$1,345
5	2 Bedrooms	70%	$1,612
1	3 Bedrooms	70%	$1,865
3	1 Bedroom	80%	$1,538
4	2 Bedrooms	80%	$1,843
3	3 Bedrooms	80%	$2,132
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$7,222,170
Construction Costs	$37,134,595
Construction Hard Cost Contingency	$2,030,339
Soft Cost Contingency	$800,493
Architectural/Engineering	$1,495,000
Const. Interest, Perm. Financing	$4,828,020
Legal Fees	$325,000
Reserves	$772,432
Other Costs	$4,004,977
Developer Fee	$7,666,735
Total	**$66,279,761**

Residential

Construction Cost Per Square Foot:	$374
Per Unit Cost:	$720,432
Estimated Hard Per Unit Cost:	$336,423
True Cash Per Unit Cost*:	$709,563
Bond Allocation Per Unit:	$359,353
Bond Allocation Per Restricted Rental Unit:	$472,293

Construction Financing

Source	Amount
Bank of America: Tax-Exempt	$33,060,500
Bank of America: Taxable	$5,197,193
San Bernardino County: HOME	$4,500,000
City of San Bernardino: HOME	$4,410,000
HACSB²: Ground Lease	$3,600,000
Accrued Interest	$638,010
Deferred Costs	$1,454,748
Developer Fee Contribution	$4,166,735
Deferred Developer Fee	$1,000,000
General Partner Equity	$100
Tax Credit Equity	$8,252,475

Permanent Financing

Source	Amount
Bank of America	$10,731,668
HCD: AHSC	$8,735,000
San Bernardino County: HOME	$5,000,000
City of San Bernardino: HOME/LMIHAF¹	$4,900,000
HACSB²: Ground Lease	$3,600,000
Accrued Interest	$638,010
Developer Fee Contribution	$4,166,735
Deferred Developer Fee	$1,000,000
General Partner Equity	$100
Tax Credit Equity	$27,508,248
TOTAL	**$66,279,761**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
¹Low-and Moderate-Incoming Housing Asset Fund
²Housing Authority of the County of San Bernardino

Determination of Credit Amount(s)

Requested Eligible Basis:	$58,778,302
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$76,411,793
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,056,472
Approved Developer Fee (in Project Cost & Eligible Basis):	$7,666,735
Federal Tax Credit Factor:	$0.90000

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 $709,563. The applicant noted that the cost is attributed to the requirement of prevailing wage payments and required off-site improvements.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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
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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 132.192%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Sakura, located at 2000 16th Street in Sacramento on a 0.75 acre site, requested and is being recommended for a reservation of $2,022,553 in annual federal tax credits and $30,164,000 of tax-exempt bond cap to finance the new construction of 134 units of housing, consisting of 133 restricted rental units and 1 unrestricted manager's unit. The project will have 68 studio units, 65 one-bedroom units, and 1 two-bedroom unit, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Mutual Housing California and will be located in Senate District 8 and Assembly District 6.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number CA-24-727

Project Name Sakura

Site Address:	2000 16th Street Sacramento, CA 95818
County:	Sacramento
Census Tract:	20.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,022,553	$0
Recommended:	$2,022,553	$0

Tax-Exempt Bond Allocation

Recommended:	$30,164,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	2000 16th St Associates, LP
Contact:	Parker Evans
Address:	3321 Power Inn Road, Suite 320 Sacramento, CA 95826
Phone:	(916) 749-8045
Email:	parker@mutualhousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CA Public Finance Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Banner Bank

Development Team

General Partner(s) or Principal Owner(s):	2000 16th St Mutual Housing Association, LLC 2000 16th St CACDC Association, LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Mutual Housing California Capitol Area Community Development Corporation
Developer:	Mutual Housing California
Investor/Consultant:	California Housing Partnership
Management Agent:	Mutual Housing Management

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	134	
No. / % of Low Income Units:	133	100.00%
Average Targeted Affordability:	50.01%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Non-Targeted
Geographic Area:	Capital Region
State Ceiling Pool:	New Construction
Set Aside:	Northern Region
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	34	26%
50% AMI:	31	23%
60% AMI:	68	51%

Unit Mix

68	SRO/Studio Units
65	1-Bedroom Units
1	2-Bedroom Units
134	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
19	SRO/Studio	30%	$619
15	SRO/Studio	50%	$1,032
34	SRO/Studio	60%	$1,239
15	1 Bedroom	30%	$663
16	1 Bedroom	50%	$1,105
34	1 Bedroom	60%	$1,326
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application

Land and Acquisition	$4,934,241
Construction Costs	$32,615,849
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,722,112
Soft Cost Contingency	$443,119
Relocation	$0
Architectural/Engineering	$1,450,130
Const. Interest, Perm. Financing	$6,504,089
Legal Fees	$93,547
Reserves	$359,535
Other Costs	$2,523,899
Developer Fee	$6,693,267
Commercial Costs	$746,550
Total	**$58,086,338**

Residential

Construction Cost Per Square Foot:	$363
Per Unit Cost:	$427,145
Estimated Hard Per Unit Cost:	$218,680
True Cash Per Unit Cost*:	$372,189
Bond Allocation Per Unit:	$225,104
Bond Allocation Per Restricted Rental Unit:	$226,797

Construction Financing

Source	Amount
Banner Bank: Tax-Exempt	$30,164,000
Banner Bank: Taxable	$12,549,813
CADA[1]: Gap Loan	$4,000,000
CADA[1]: Seller Carryback	$3,280,000
Deferred Costs	$2,213,918
Deferred Developer Fee	$4,193,267
Tax Credit Equity	$1,685,340

Permanent Financing

Source	Amount
Banner Bank: Tax-Exempt	$2,557,000
CADA[1]: Gap Loan	$4,000,000
CADA[1]: Seller Carryback	$3,280,000
HCD: AHSC	$25,300,000
Sponsor Loan	$507,678
Deferred Developer Fee	$4,193,267
Tax Credit Equity	$18,248,393
TOTAL	**$58,086,338**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Capital Area Development Authority

Determination of Credit Amount(s)

Requested Eligible Basis:	$50,563,828
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$50,563,828
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,022,553
Approved Developer Fee in Project Cost:	$6,693,267
Approved Developer Fee in Eligible Basis:	$6,590,915
Approved Developer Fee (in Project Cost & Eligible Basis):	
Federal Tax Credit Factor:	$0.90225

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 108.414%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

North Fair Oaks Apartments, located at 430-434 Douglas Avenue and 429-431 Macarthur Avenue in Unincorporated Redwood City on a 0.46 acre site, requested and is being recommended for a reservation of $2,997,139 in annual federal tax credits and $34,263,756 of tax-exempt bond cap to finance the new construction of 86 units of housing, consisting of 85 restricted rental units and 1 unrestricted manager's unit. The project will have 47 studio units, 29 one-bedroom units, 5 two-bedroom units, and 5 three-bedroom units, serving special needs tenants with rents affordable to households earning 20%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in February 2027. The project will be developed by Affirmed Housing Group, Inc. and will be located in Senate District 13 and Assembly District 21.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Housing for a Healthy California (HHC) program of HCD and Mental Health Services Act (MHSA) through CalHFA.

Project Number	CA-24-731
Project Name	North Fair Oaks Apartments
Site Address:	430-434 Douglas Avenue and 429-431 Macarthur Avenue Unincorporated Redwood City, CA 94063
County:	San Mateo
Census Tract:	6105.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$2,997,139	$0
Recommended:	$2,997,139	$0

Tax-Exempt Bond Allocation

Recommended:	$34,263,756

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Compass for Affordable Housing
Contact:	Robin Martinez
Address:	13520 Evening Creek Drive North, Suite 560 San Diego, CA 92128
Phone:	(858) 386-4211
Email:	robin@compassfah.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Muncipal Finance Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Silicon Valley Bank, a division of First-Citizens Bank & Trust Company

Development Team

General Partner(s) or Principal Owner(s):	CFAH Housing, LLC AHG North Fair Oaks, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Compass for Affordable Housing Affirmed Housing Group, Inc.
Developer:	Affirmed Housing Group, Inc.
Investor/Consultant:	Red Stone Equity Partners
Management Agent:	Solari Enterprises, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	86	
No. / % of Low Income Units:	85	100.00%
Average Targeted Affordability:	42.89%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (24 Units - 28%)	

Information

Housing Type:	Special Needs
Geographic Area:	South and West Bay Region
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	39
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	39	46%
50% AMI:	2	2%
60% AMI:	44	52%

Unit Mix

47	SRO/Studio Units
29	1-Bedroom Units
5	2-Bedroom Units
5	3-Bedroom Units
86	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
14	SRO/Studio	20%	$685
6	SRO/Studio	30%	$1,028
2	SRO/Studio	30%	$1,028
25	SRO/Studio	60%	$2,056
10	1 Bedroom	20%	$734
5	1 Bedroom	30%	$1,101
2	1 Bedroom	30%	$1,101
12	1 Bedroom	60%	$2,203
1	2 Bedrooms	50%	$2,203
3	2 Bedrooms	60%	$2,644
1	3 Bedrooms	50%	$2,546
4	3 Bedrooms	60%	$3,055
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$8,011,083
Construction Costs	$36,987,200
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,219,516
Soft Cost Contingency	$640,591
Relocation	$100,000
Architectural/Engineering	$3,300,000
Const. Interest, Perm. Financing	$6,314,197
Legal Fees	$1,133,500
Reserves	$475,000
Other Costs	$1,933,010
Developer Fee	$7,518,679
Commercial Costs	$0
Total	**$68,632,776**

Residential	
Construction Cost Per Square Foot:	$532
Per Unit Cost:	$798,056
Estimated Hard Per Unit Cost:	$364,012
True Cash Per Unit Cost*:	$757,339
Bond Allocation Per Unit:	$398,416
Bond Allocation Per Restricted Rental Unit:	$403,103

Construction Financing

Source	Amount
Silicon Valley Bank: Tax-Exempt	$34,263,756
Lument Securities, LLC	$2,087,222
San Mateo County: Measure K	$11,157,315
San Mateo County: HHC	$6,213,322
San Mateo County: MHSA	$1,980,000
Deferred Costs	$1,494,749
Tax Credit Equity	$11,436,411

Permanent Financing

Source	Amount
Lument Real Estate Capital, LLC	$14,342,233
Lument Securities, LLC	$2,087,222
San Mateo County: Measure K	$12,397,017
San Mateo County: HHC	$6,213,322
San Mateo County: MHSA	$2,200,000
Deferred Developer Fee	$3,501,608
Tax Credit Equity	$27,891,374
TOTAL	**$68,632,776**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$57,643,208
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$74,936,170
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$2,997,139
Approved Developer Fee (in Project Cost & Eligible Basis):	$7,518,679
Federal Tax Credit Factor:	$0.93060

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 $757,339. The applicant noted that the per unit cost is attributed to high land prices in a prime location, additional parking spaces, a concrete podium design, ADA standards, energy efficiency, and prevailing wage requirements.

The project will restrict 39 (45%) of the units to serve special needs tenants, consisting of homeless households with mental illness and other homeless households.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 114.821%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Veteran Commons, located at 11269 Garfield Avenue in Downey on a 2.24 acre site, requested and is being recommended for a reservation of $3,181,709 in annual federal tax credits and $34,045,000 of tax-exempt bond cap to finance the new construction of 100 units of housing, consisting of 99 restricted rental units and 1 unrestricted manager's unit. The project will have 50 one-bedroom units, 40 two-bedroom units, and 10 three-bedroom units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in March 2027. The project will be developed by Abode Communities and will be located in Senate District 30 and Assembly District 64.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Infill Infrastructure Grant (IIG) and Veterans Housing and Homelessness Prevention (VHHP) programs of HCD.

Project Number	CA-24-732

Project Name	Veteran Commons
Site Address:	11269 Garfield Avenue Downey, CA 90242
County:	Los Angeles
Census Tract:	9800.12

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,181,709	$0
Recommended:	$3,181,709	$0

Tax-Exempt Bond Allocation	
Recommended:	$34,045,000

CTCAC Applicant Information	
CTCAC Applicant/CDLAC Sponsor:	Veteran Commons, L.P.
Contact:	Lara Regus
Address:	1149 South Hill Street, Suite 700 Los Angeles, CA 90015
Phone:	213-225-2812
Email:	lregus@abodecommunities.org

Bond Financing Information	
CDLAC Applicant/Bond Issuer:	Los Angeles County Development Authority
Bond Counsel:	Kutak Rock LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Veteran Commons MGP, LLC Veteran Commons CGP, LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Abode Communities PATH Ventures
Developer:	Abode Communities
Investor/Consultant:	California Housing Partnership
Management Agent:	Abode Communities

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	3	
Total # of Units:	100	
No. / % of Low Income Units:	99	100.00%
Average Targeted Affordability:	46.58%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Project-based Vouchers (50 Units - 50%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	Balance of Los Angeles County
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	50
CDLAC Project Analyst:	Daisy Andrade
CTCAC Project Analyst:	Jacob Couch

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	20	20%
40% AMI:	10	10%
50% AMI:	45	45%
60% AMI:	24	24%

Unit Mix

50	1-Bedroom Units
40	2-Bedroom Units
10	3-Bedroom Units
100	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
15	1 Bedroom	30%	$780
35	1 Bedroom	50%	$1,300
4	2 Bedrooms	30%	$936
8	2 Bedrooms	40%	$1,248
8	2 Bedrooms	50%	$1,326
19	2 Bedrooms	60%	$1,872
1	3 Bedrooms	30%	$1,081
2	3 Bedrooms	40%	$1,442
2	3 Bedrooms	50%	$1,473
5	3 Bedrooms	60%	$2,163
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$912,658
Construction Costs	$43,624,806
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,392,711
Soft Cost Contingency	$666,609
Relocation	$0
Architectural/Engineering	$2,619,609
Const. Interest, Perm. Financing	$7,691,054
Legal Fees	$235,000
Reserves	$1,092,657
Other Costs	$2,193,388
Developer Fee	$3,800,000
Commercial Costs	$0
Total	**$67,228,492**

Residential

Construction Cost Per Square Foot:	$448
Per Unit Cost:	$672,285
Estimated Hard Per Unit Cost:	$379,476
True Cash Per Unit Cost*:	$659,285
Bond Allocation Per Unit:	$340,450
Bond Allocation Per Restricted Rental Unit:	$343,889

Construction Financing

Source	Amount
Citi: Tax-Exempt	$34,045,000
Citi: Taxable	$3,738,725
HCD: IIG	$2,880,000
LACDA: AHTF[1]	$16,500,000
LACDA: Accrued Interest	$798,210
LISC: NEF[2]	$80,000
Deferred Costs	$2,197,657
Deferred Developer Fee	$1,300,000
Tax Credit Equity	$5,688,900

Permanent Financing

Source	Amount
Citi: Tax-Exempt	$3,551,000
HCD: IIG	$3,200,000
HCD: VHHP	$10,189,227
LACDA: AHTF[1]	$16,600,000
LACDA: Accrued Interest	$798,210
LISC: NEF[2]	$80,000
GCAHT[3]	$2,339,889
Deferred Developer Fee	$1,300,000
Tax Credit Equity	$29,170,166
TOTAL	**$67,228,492**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Los Angeles County Development Authority: Affordable Housing Trust Fund
[2]Local Initiatives Support Corporation: National Equity Fund Grant
[3]Gateway Cities Affordable Housing Trust

Determination of Credit Amount(s)

Requested Eligible Basis:	$61,186,707
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$79,542,719
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,181,709
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,800,000
Federal Tax Credit Factor:	$0.91681

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 $659,285 per unit. The applicant noted that the per unit cost is attributed to construction costs, higher interest rates, and high insurance premiums.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 134.473%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Victory Boulevard, located at 17100 Victory Boulevard in Los Angeles on a 1.84 acre site, requested and is being recommended for a reservation of $7,014,614 in annual federal tax credits and $19,999,198 in total state tax credits and $78,697,978 of tax-exempt bond cap to finance the new construction of 194 units of housing, consisting of 192 restricted rental units and 2 unrestricted manager's units. The project will have 44 studio units, 52 one-bedroom units, 50 two-bedroom units, and 48 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in April 2027. The project will be developed by Linc Housing Corporation and will be located in Senate District 27 and Assembly District 46.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Contract.

Project Number	CA-24-735
Project Name	Victory Boulevard
Site Address:	17100 Victory Boulevard
	Los Angeles, CA 91316
County:	Los Angeles
Census Tract:	9800.24

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$7,014,614	$19,999,198
Recommended:	$7,014,614	$19,999,198

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation
Recommended: $78,697,978

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Linc Housing Corporation
Contact:	Anders Plett
Address:	3590 Elm Avenue
	Long Beach, CA 90807
Phone:	562-684-1100
Email:	aplett@linchousing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	HACLA
Bond Counsel:	Hawkins, Delafield & Wood LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Linc Victory Blvd, LLC Victory Boulevard Apartments LLC
General Partner Type:	Nonprofit
Parent Company(ies):	Linc Housing Corporation La Cienega LOMOD, Inc.
Developer:	Linc Housing Corporation
Investor/Consultant:	California Housing Partnership
Management Agent:	National Community Renaissance

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	2	
Total # of Units:	194	
No. / % of Low Income Units:	192	100.00%
Average Targeted Affordability:	44.44%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Contract (162 Units - 85%)	

Information

Housing Type:	Large Family
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	87
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Sabrina Yang

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	97	51%
50% AMI:	66	34%
80% AMI*:	29	15%

*CTCAC restricted only

Unit Mix

44 SRO/Studio Units
52 1-Bedroom Units
50 2-Bedroom Units
48 3-Bedroom Units
194 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
44	SRO/Studio	30%	$728
43	1 Bedroom	30%	$780
5	2 Bedrooms	30%	$936
5	3 Bedrooms	30%	$1,081
32	2 Bedrooms	50%	$1,560
34	3 Bedrooms	50%	$1,803
9	1 Bedroom	80%	$2,080
11	2 Bedrooms	80%	$2,496
9	3 Bedrooms	80%	$2,885
2	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$8,190,818
Construction Costs	$93,134,912
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,657,037
Soft Cost Contingency	$953,896
Relocation	$0
Architectural/Engineering	$2,090,611
Const. Interest, Perm. Financing	$17,248,161
Legal Fees	$648,328
Reserves	$1,364,789
Other Costs	$3,601,614
Developer Fee	$17,595,184
Commercial Costs	$0
Total	**$149,485,350**

Residential	
Construction Cost Per Square Foot:	$462
Per Unit Cost:	$770,543
Estimated Hard Per Unit Cost:	$410,784
True Cash Per Unit Cost*:	$710,774
Bond Allocation Per Unit:	$405,660
Bond Allocation Per Restricted Rental Unit:	$482,810

Construction Financing

Source	Amount
CitiBank: Tax-Exempt	$78,697,978
CitiBank: Taxable	$38,626,360
HACLA[1]	$750,000
Deferred Costs	$5,505,958
Deferred Developer Fee	$11,595,185
General Partner Equity	$100
Tax Credit Equity	$14,309,770

Permanent Financing

Source	Amount
CitiBank: Tax-Exempt	$53,805,000
HACLA[1]	$750,000
Deferred Developer Fee	$11,595,185
General Partner Equity	$99
Tax Credit Equity	$83,335,066
TOTAL	**$149,485,350**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Housing Authority of the City Los Angeles

Determination of Credit Amount(s)

Requested Eligible Basis:	$134,896,414
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$175,365,338
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$7,014,614
Total State Credit:	$19,999,198
Approved Developer Fee (in Project Cost & Eligible Basis):	$17,595,184
Federal Tax Credit Factor:	$0.93713
State Tax Credit Factor:	$0.88000

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 $710,744. The applicant noted that the per unit cost is attributed to the requirement of prevailing wage payments and the project being fully electric.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 102.381%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Distel Circle, located at 330 Distel Circle in Los Altos on a 0.87 acre site, requested and is being recommended for a reservation of $4,096,134 in annual federal tax credits and $10,431,853 in total state tax credits and $47,511,721 of tax-exempt bond cap to finance the new construction of 90 units of housing, consisting of 88 restricted rental units and 2 unrestricted manager's units. The project will have 24 studio units, 20 one-bedroom units, 23 two-bedroom units, and 23 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by EAH Inc. and will be located in Senate District 13 and Assembly District 23.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH) program of HCD.

Project Number	CA-24-736
Project Name	Distel Circle
Site Address:	330 Distel Circle Los Altos, CA 94022
County:	Santa Clara
Census Tract:	5104.00

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$4,096,134	$10,431,853
Recommended:	$4,096,134	$10,431,853

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$47,511,721

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	330 Distel Circle, L.P.
Applicant for State Credits:	
Contact:	Welton Jordan
Address:	22 Pelican Way San Rafael, CA 94901
Phone:	415-295-8876
Email:	welton.jordan@eahhousing.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Wells Fargo Bank, N.A.

Development Team

General Partner / Principal Owner:	330 Distel Circle EAH, LLC
General Partner Type:	Nonprofit
Parent Company:	EAH Inc.
Developer:	EAH Inc.
Investor/Consultant:	Community Economics, Inc.
Management Agent:	EAH Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	90	
No. / % of Low Income Units:	88	100.00%
Average Targeted Affordability:	44.21%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HOME / HUD Section 8 Project-based Vouchers (32 Units - 36%)	

Information

Housing Type:	Large Family
Geographic Area:	South and West Bay Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	22
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	47	53%
50% AMI:	10	11%
60% AMI:	25	28%
80% AMI*:	6	7%

*CTCAC restricted only

Unit Mix

24	SRO/Studio Units
20	1-Bedroom Units
23	2-Bedroom Units
23	3-Bedroom Units
90	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
14	SRO/Studio	30%	$968
6	SRO/Studio	50%	$1,613
4	SRO/Studio	60%	$1,936
11	1 Bedroom	30%	$1,037
8	1 Bedroom	60%	$2,074
1	1 Bedroom	80%	$2,766
9	2 Bedrooms	30%	$1,244
1	2 Bedrooms	30%	$1,244
2	2 Bedrooms	30%	$1,244
2	2 Bedrooms	50%	$2,073
5	2 Bedrooms	60%	$2,488
2	2 Bedrooms	80%	$3,318
2	3 Bedrooms	30%	$1,437
8	3 Bedrooms	30%	$1,437
2	3 Bedrooms	50%	$2,396
8	3 Bedrooms	60%	$2,875
3	3 Bedrooms	80%	$3,834
2	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$7,941,090
Construction Costs	$55,525,946
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$5,399,545
Soft Cost Contingency	$1,228,440
Relocation	$0
Architectural/Engineering	$2,590,984
Const. Interest, Perm. Financing	$7,236,282
Legal Fees	$125,000
Reserves	$797,501
Other Costs	$7,894,348
Developer Fee	$6,500,000
Commercial Costs	$0
Total	**$95,239,137**

Residential

Construction Cost Per Square Foot:	$566
Per Unit Cost:	$1,058,213
Estimated Hard Per Unit Cost:	$535,498
True Cash Per Unit Cost*:	$897,960
Bond Allocation Per Unit:	$527,908
Bond Allocation Per Restricted Rental Unit:	$579,411

Construction Financing

Source	Amount
Wells Fargo: Tax-Exempt	$47,511,721
Wells Fargo: Taxable	$9,535,204
Santa Clara County	$14,600,000
Santa Clara County: Land	$7,360,000
FHLBank San Francisco: AHP	$1,320,000
Waived Impact Fees	$4,644,344
Deferred Developer Fee	$2,418,351
Deferred Costs	$4,119,150
Tax Credit Equity	$3,730,366

Permanent Financing

Source	Amount
CCRC: Tax-Exempt	$16,277,800
Santa Clara County	$14,600,000
Santa Clara County: Land	$7,360,000
FHLBank San Francisco: AHP	$1,320,000
Waived Impact Fees	$4,644,344
Deferred Developer Fee	$2,418,351
General Partner Equity	$1,281,649
Solar Tax Credit Equity	$399,213
Tax Credit Equity	$46,937,780
TOTAL	**$95,239,137**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$78,771,804
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$102,403,346
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,096,134
Total State Credit:	$10,431,853
Approved Developer Fee (in Project Cost & Eligible Basis):	$6,500,000
Federal Tax Credit Factor:	$0.93707
State Tax Credit Factor:	$0.82000

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 $897,960. The applicant noted that the per unit cost is attributed to prevailing wages requirements, larger unit sizes, LEED Gold certification, covered parking, Bay Area development expenses, and premium materials mandated by Los Altos design standards.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 96.643%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Larkin Pine Senior Housing, located at 1303 Larkin Street in San Francisco on a 0.71 acre site, requested and is being recommended for a reservation of $1,282,006 in annual federal tax credits and $13,987,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 63 units of housing, consisting of 62 restricted rental units and 1 unrestricted manager's unit. The project has 45 studio units, 18 one-bedroom units, serving tenants with rents affordable to households earning 40% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2026. The project will be developed by Chinatown Community Development Center, Inc. and is located in Senate District 11 and Assembly District 17.

Larkin Pine Senior Housing is a re-syndication of an existing Low Income Housing Tax Credit (LIHTC) project, Larkin Pine Senior Housing (CA-92-140). See Resyndication and Resyndication Transfer Event below for additional information. The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers and HUD Rental Assistance Demonstration (RAD). The project financing includes state funding from the Loan Program Restructuring (LPR) - Rental Housing Construction Program (RHCP) program of HCD.

Project Number	CA-24-737
Project Name	Larkin Pine Senior Housing
Site Address:	1303 Larkin Street San Francisco, CA 94109
County:	San Francisco
Census Tract:	111.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,282,006	$0
Recommended:	$1,282,006	$0

Tax-Exempt Bond Allocation

Recommended:	$13,987,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Chinatown Community Development Center, Inc.
Contact:	Sharon Christen
Address:	615 Grant Avenue
Phone:	415-875-7468
Email:	sharon.christen@chinatowncdc.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	City and County of San Francisco
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Chase Bank

Development Team

General Partner(s) or Principal Owner(s):	Chinatown Community Development Center, Inc.
General Partner Type:	Nonprofit
Parent Company(ies):	Chinatown Community Development Center, Inc.
Developer:	Chinatown Community Development Center, Inc.
Investor/Consultant:	California Housing Partnership Corporation
Management Agent:	Chinatown Community Development Center, Inc.

Project Information

Construction Type:	Acquisition & Rehabilitation
Total # Residential Buildings:	1
Total # of Units:	63
No. / % of Low Income Units:	62 100.00%
Average Targeted Affordability:	32.63%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HUD RAD (29 Units - 46%) / HUD Section 8 Project-based Vouchers (15 Units - 24%)

Information

Housing Type:	Non-Targeted
Geographic Area:	San Francisco County
State Ceiling Pool:	Other Rehabilitation
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
40% AMI:	62	100%

Unit Mix

45	SRO/Studio Units
18	1-Bedroom Units
63	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
15	SRO/Studio	40%	$1,371
14	1 Bedroom	40%	$1,469
12	SRO/Studio	40%	$1,371
3	1 Bedroom	40%	$1,469
18	SRO/Studio	40%	$500
1	1 Bedroom	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$9,263,139
Construction Costs	$0
Rehabilitation Costs	$12,381,146
Construction Hard Cost Contingency	$1,839,631
Soft Cost Contingency	$427,227
Relocation	$2,112,031
Architectural/Engineering	$678,733
Const. Interest, Perm. Financing	$3,262,773
Legal Fees	$271,971
Reserves	$704,000
Other Costs	$483,239
Developer Fee	$3,048,393
Commercial Costs	$0
Total	**$34,472,284**

Residential

Construction Cost Per Square Foot:	$397
Per Unit Cost:	$547,179
Estimated Hard Per Unit Cost:	$163,875
True Cash Per Unit Cost*:	$530,538
Bond Allocation Per Unit:	$222,016
Bond Allocation Per Restricted Rental Unit:	$225,597

Construction Financing

Source	Amount
Chase: Tax-Exempt	$13,987,000
Chase: Taxable	$1,951,547
HCD LPR RHCP	$3,473,704
SF MOHCD¹ PASS²	$3,596,412
SF MOHCD¹ PASS²	$584,497
SF MOHCD¹ ENP³	$2,494,853
SF MOHCD¹: Acquisition	$4,061,151
Acquired Reserves	$51,818
Deferred Accrued Interest	$430,550
Deferred Costs	$1,752,689
Deferred Developer Fee	$1,048,393
Tax Credit Equity	$1,039,670

Permanent Financing

Source	Amount
HCD LPR RHCP	$3,473,704
SF MOHCD¹ PASS²	$6,500,452
SF MOHCD¹ PASS²	$3,596,412
SF MOHCD¹ PASS²	$584,497
SF MOHCD¹ ENP³	$1,500,000
SF MOHCD¹ ENP³	$994,853
SF MOHCD¹: Acquisition	$4,061,151
Acquired Reserves	$51,818
Deferred Accrued Interest	$430,550
Deferred Developer Fee	$1,048,393
Tax Credit Equity	$12,230,455
TOTAL	**$34,472,284**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
¹San Francisco Mayor's Office of Housing and Community Development
²Preservation and Seismic Safety Program
³Existing Nonprofit Owned Rental Housing

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$22,212,108
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$3,174,392
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$28,875,741
Qualified Basis (Acquisition):	$3,174,392
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$1,155,030
Maximum Annual Federal Credit, Acquisition:	$126,976
Total Maximum Annual Federal Credit:	$1,282,006
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,048,393
Federal Tax Credit Factor:	$0.95401

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
This SRO project requested and was granted a waiver to the in-unit refrigerator requirement because the project includes an existing common area kitchen facility for tenants, which will be updated as part of the rehabilitation.

The reservation of tax credits is contingent upon verification of the HUD RAD rental subsidy annual amount, number of units receiving assistance, term, and expiration date by the bond issuance deadline.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event
Prior to closing, the applicant or its assignee shall obtain CTCAC's consent to assign and assume the existing Regulatory Agreement CA-92-140. To be eligible for a new award of tax credits, the owner must provide documentation with the Form 8609 request (the placed in service submission) that the acquisition date and the placed in service date both occurred after the existing federal 15 year compliance period was completed. For resyndications that were originally rehabilitation and acquisition, the resyndication acquisition date cannot occur before the last rehabilitation credit year of the original credit period.

As required by the IRS, the newly resyndicated project will continue to use the originally assigned Building Identification Numbers (BINs).

The newly resyndicated project shall continue to meet the rents and income targeting levels in the existing regulatory agreement(s) and any deeper targeting levels in the new regulatory agreement(s) for the duration of the new regulatory agreement(s). Existing households determined to be income-qualified for purposes of IRC §42 credit during the 15-year compliance period are concurrently income-qualified households for purposes of the extended use agreement. As a result, any household determined to be income qualified at the time of move-in under the existing regulatory agreement (CA-92-140) is a qualified low-income household for the subsequent allocation (existing household eligibility is “grandfathered”).

The project is a resyndication where the existing regulatory agreement requires service amenities. The project shall provide a similar or greater level of services for a period of at least 15 years under the new regulatory agreement. The project is deemed to have met this requirement based on CTCAC staff's review of the commitment in the application. The services documented in the placed in service package will be reviewed by CTCAC staff for compliance with this requirement at the time of the placed in service submission.

This project is a resyndication occurring concurrently with a Transfer Event without distribution of Net Project Equity, and thus is waived from the requirements under CTCAC Regulation Section 10320(b)(4)(B).

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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 277.273%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Kooser Apartments, located at 1371 Kooser Road in San Jose on a 1.63 acre site, requested and is being recommended for a reservation of $5,902,201 in annual federal tax credits and $31,579,858 in total state tax credits and $73,708,167 of tax-exempt bond cap to finance the new construction of 191 units of housing, consisting of 189 restricted rental units and 2 unrestricted manager's units. The project will have 75 studio units, 18 one-bedroom units, 48 two-bedroom units, and 50 three-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in September 2027. The project will be developed by Affirmed Housing Group and will be located in Senate District 15 and Assembly District 28.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH) program of HCD.

Project Number	CA-24-738
Project Name	Kooser Apartments
Site Address:	1371 Kooser Road San Jose, CA 95118
County:	Santa Clara
Census Tract:	5029.10

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$5,902,201	$31,579,858
Recommended:	$5,902,201	$31,579,858

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$73,708,167

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Compass for Affordable Housing
Contact:	Robin Martinez
Address:	13520 Evening Creek Drive North, #560 San Diego, CA 92128
Phone:	858.386.4211
Email:	robin@compassfah.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	City of San Jose
Bond Counsel:	Anzel Galvan LLP
Public Sale:	Credit Enhanced
Underwriter:	Lument Securities, LLC
Credit Enhancement Provider:	Banner Bank
Rating:	AAA

Development Team

General Partner(s) or Principal Owner(s):	AHG Kooser LLC CFAH Housing LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Affirmed Housing Group, Inc Compass for Affordable Housing
Developer:	Affirmed Housing Group
Investor/Consultant:	Boston Financial
Management Agent:	Solari Enterprises

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	191	
No. / % of Low Income Units:	189	100.00%
Average Targeted Affordability:	46.05%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (30 Units - 16%)	

Information

Housing Type:	Large Family
Geographic Area:	South and West Bay Region
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	86
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Sabrina Yang

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	50	26%
40% AMI:	17	9%
50% AMI:	63	33%
60% AMI:	39	21%
70% AMI*:	20	11%

*CTCAC restricted only

Unit Mix

75	SRO/Studio Units
18	1-Bedroom Units
48	2-Bedroom Units
50	3-Bedroom Units
191	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
20	SRO/Studio	30%	$968
8	SRO/Studio	40%	$968
44	SRO/Studio	50%	$1,613
3	SRO/Studio	60%	$1,866
10	1 Bedroom	30%	$1,037
3	1 Bedroom	40%	$1,037
5	1 Bedroom	50%	$1,383
10	2 Bedrooms	30%	$1,244
2	2 Bedrooms	40%	$1,244
10	2 Bedrooms	50%	$1,659
16	2 Bedrooms	60%	$2,488
10	2 Bedrooms	70%	$2,903
10	3 Bedrooms	30%	$1,437
4	3 Bedrooms	40%	$1,437
4	3 Bedrooms	50%	$1,917
20	3 Bedrooms	60%	$2,875
10	3 Bedrooms	70%	$3,354
2	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,843,484
Construction Costs	$104,691,987
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$6,301,906
Soft Cost Contingency	$1,819,972
Relocation	$0
Architectural/Engineering	$3,450,000
Const. Interest, Perm. Financing	$14,088,052
Legal Fees	$233,500
Reserves	$1,463,587
Other Costs	$11,301,969
Developer Fee	$11,700,000
Commercial Costs	$0
Total	**$156,894,457**

Residential

Construction Cost Per Square Foot:	$693
Per Unit Cost:	$821,437
Estimated Hard Per Unit Cost:	$461,254
True Cash Per Unit Cost*:	$791,594
Bond Allocation Per Unit:	$385,907
Bond Allocation Per Restricted Rental Unit:	$436,143

Construction Financing

Source	Amount
Banner Bank: Tax-Exempt	$73,708,167
Banner Bank: Taxable	$21,410,242
County of Santa Clara¹	$1,800,000
City of San Jose	$19,062,289
Lument Securities LLC	$6,275,845
Deferred Costs	$9,633,587
Tax Credit Equity	$25,004,327

Permanent Financing

Source	Amount
Lument	$40,019,791
County of Santa Clara¹	$2,000,000
City of San Jose	$19,551,066
Lument Securities LLC	$6,275,845
Deferred Developer Fee	$5,700,000
Tax Credit Equity	$83,347,755
TOTAL	**$156,894,457**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
¹includes NPLH and Measure A - Affordable Housing Bond Funds

Determination of Credit Amount(s)

Requested Eligible Basis:	$147,555,016
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$147,555,016
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,902,201
Total State Credit:	$31,579,858
Approved Developer Fee (in Project Cost & Eligible Basis):	$11,700,000
Federal Tax Credit Factor:	$0.93060
State Tax Credit Factor:	$0.90000

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 $791,594. The applicant noted that the per unit cost is attributed to land cost, material costs, parking garage costs, costs required to meet GreenPoint Rated Platinum and LEED Gold, and prevailing wages.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 101.853%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Westside Village, located at 850 Almar Avenue in Santa Cruz on a 0.91 acre site, requested and is being recommended for a reservation of $1,648,928 in annual federal tax credits and $7,600,000 in total state tax credits and $18,446,853 of tax-exempt bond cap to finance the new construction of 38 units of housing, consisting of 37 restricted rental units and 1 unrestricted manager's unit. The project will have 23 two-bedroom units, and 15 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in March 2027. The project will be developed by CRP Affordable Housing & Community Development LLC and will be located in Senate District 17 and Assembly District 28.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number CA-24-740

Project Name	Westside Village
Site Address:	850 Almar Avenue Santa Cruz, CA 95060
County:	Santa Cruz
Census Tract:	1011.00

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$1,648,928	$7,600,000
Recommended:	$1,648,928	$7,600,000

* The applicant made an election to sell (certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation
Recommended: $18,446,853

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	CRP Westside Village LP
Applicant for State Credits:	PSCDC Westside LLC
Contact:	Paul Salib
Address:	122 East 42nd Street, Suite 1903 New York, NY 10168
Phone:	212-776-1914
Email:	psalib@crpaffordable.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partners or Principal Owners:	PSCDC Westside LLC CRP Westside Village AGP LLC
General Partner Type:	Joint Venture
Parent Companies:	Pacific Southwest Community Development Corporation CRP Affordable Housing and Community Development LLC
Developer:	CRP Affordable Housing & Community Development LLC
Investor/Consultant:	RBC Capital Markets
Management Agent:	Cambridge Real Estate Services, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	38	
No. / % of Low Income Units:	37	100.00%
Average Targeted Affordability:	46.21%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (26 Units - 66%)	

Information

Housing Type:	Large Family
Geographic Area:	Central Coast Region
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	25	68%
80% AMI*:	12	32%

*CTCAC restricted only

Unit Mix

23	2-Bedroom Units
15	3-Bedroom Units
38	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
10	2 Bedrooms	80%	$3,259
13	2 Bedrooms	30%	$1,222
2	3 Bedrooms	80%	$3,766
12	3 Bedrooms	30%	$1,412
1	3 Bedrooms	Manager Unit	$0

Project Cost Summary at Application

Land and Acquisition	$5,400,000
Construction Costs	$19,562,120
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,007,000
Soft Cost Contingency	$326,430
Relocation	$0
Architectural/Engineering	$1,250,000
Const. Interest, Perm. Financing	$3,771,628
Legal Fees	$325,000
Reserves	$465,355
Other Costs	$2,307,845
Developer Fee	$4,136,107
Commercial Costs	$0
Total	**$38,551,485**

Residential

Construction Cost Per Square Foot:	$502
Per Unit Cost:	$1,014,513
Estimated Hard Per Unit Cost:	$445,717
True Cash Per Unit Cost*:	$963,217
Bond Allocation Per Unit:	$485,444
Bond Allocation Per Restricted Rental Unit:	$737,874

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$18,446,853
Citibank: Taxable	$10,805,768
Deferred Costs	$4,126,461
Tax Credit Equity	$5,172,403

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$15,912,629
Deferred Developer Fee	$1,949,245
Tax Credit Equity	$20,689,611
TOTAL	**$38,551,485**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$31,710,155
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$41,223,202
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,648,928
Total State Credit:	$7,600,000
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,136,107
Federal Tax Credit Factor:	$0.83992
State Tax Credit Factor:	$0.90000

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 $963,217. The applicant noted that the per unit cost is affected by a requirement to pay prevailing wages, specialized construction measures to address high-water table conditions at the project's site, escalating cost of construction materials, and high acquisition cost of the Santa Cruz region.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: None.

Standard Conditions

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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 113.087%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Villa Verde, located at 84824 Calle Verde in Coachella on a 9.44 acre site, requested and is being recommended for a reservation of $3,948,871 in annual federal tax credits and $42,578,583 of tax-exempt bond cap to finance the new construction of 116 units of housing, consisting of 115 restricted rental units and 1 unrestricted manager's unit. The project will have 16 one-bedroom units, 56 two-bedroom units, and 44 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in November 2025 and be completed in November 2027. The project will be developed by Abode Communities and will be located in Senate District 18 and Assembly District 36.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from HCD's No Place Like Home (NPLH) and Permanent Local Housing Allocation (PLHA) programs.

Project Number	CA-24-744
Project Name	Villa Verde
Site Address:	84824 Calle Verde Coachella, CA 92236
County:	Riverside
Census Tract:	457.08

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,948,871	$0
Recommended:	$3,948,871	$0

Tax-Exempt Bond Allocation

Recommended:	$42,578,583

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Abode Communities
Contact:	Lara Regus
Address:	1149 South Hill Street, Suite 700 Los Angeles, CA 90015
Phone:	213-225-2812
Email:	lregus@abodecommunities.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Agency
Bond Counsel:	Jones Hall, A Professional Law Corporation
Private Placement Purchaser:	Wells Fargo Bank, N.A.

Development Team

General Partners or Principal Owners:	Villa Verde I GP, LLC
General Partner Type:	Nonprofit
Parent Company:	Abode Communities
Developer:	Abode Communities
Investor/Consultant:	California Housing Partnership Corporation
Management Agent:	Abode Communities

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	20	
Total # of Units:	116	
No. / % of Low Income Units:	115	100.00%
Average Targeted Affordability:	40.52%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (78 Units - 67%)	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	50
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	66	57%
50% AMI:	26	23%
60% AMI:	23	20%

Unit Mix

16	1-Bedroom Units
56	2-Bedroom Units
44	3-Bedroom Units
116	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
16	1 Bedroom	30%	$576
30	2 Bedrooms	30%	$691
4	3 Bedrooms	30%	$799
6	2 Bedrooms	30%	$691
10	3 Bedrooms	30%	$799
8	2 Bedrooms	50%	$1,152
4	3 Bedrooms	50%	$1,332
3	2 Bedrooms	50%	$1,152
11	3 Bedrooms	50%	$1,332
8	2 Bedrooms	60%	$1,383
15	3 Bedrooms	60%	$1,599
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,869,946
Construction Costs	$49,721,438
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,731,233
Soft Cost Contingency	$509,302
Relocation	$0
Architectural/Engineering	$2,390,716
Const. Interest, Perm. Financing	$8,463,178
Legal Fees	$214,211
Reserves	$1,450,946
Other Costs	$4,549,969
Developer Fee	$9,905,195
Commercial Costs	$0
Total	**$82,806,134**

Residential

Construction Cost Per Square Foot:	$443
Per Unit Cost:	$713,846
Estimated Hard Per Unit Cost:	$380,953
True Cash Per Unit Cost*:	$630,078
Bond Allocation Per Unit:	$367,057
Bond Allocation Per Restricted Rental Unit:	$370,249

Construction Financing

Source	Amount
Wells Fargo: Tax-Exempt	$42,578,583
HCD: PLHA	$8,000,000
HACR[1]	$219,892
HACR[1]: Taxable Housing Bond	$450,000
HACR[1]: Seller Carryback	$1,411,842
Low Income Investment Fund	$14,609,617
Deferred Costs	$2,897,146
Deferred Interest	$476,158
Deferred Developer Fee	$8,305,195
General Partner Equity	$100
Tax Credit Equity	$3,857,601

Permanent Financing

Source	Amount
CCRC: Tax-Exempt	$16,938,000
HCD: NPLH	$11,279,429
HCD: PLHA	$8,000,000
HACR[1]	$219,892
HACR[1]: Taxable Housing Bond	$450,000
HACR[1]: Seller Carryback	$1,411,842
Deferred Interest	$476,158
Deferred Developer Fee	$8,305,195
General Partner Equity	$100
Tax Credit Equity	$35,725,518
TOTAL	**$82,806,134**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Housing Authority of the County of Riverside

Determination of Credit Amount(s)

Requested Eligible Basis:	$75,939,831
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$98,721,780
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,948,871
Approved Developer Fee (in Project Cost & Eligible Basis):	$9,905,195
Federal Tax Credit Factor:	$0.90470

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
This 116-unit application was submitted as a Hybrid project serving large families. The project is comprised of a 9% component (yet to apply) consisting of 36 units and a 4% component (CA-24-744) consisting of 116 units. All units in the project will have access to a community room, supportive services offices, resident services office, laundry rooms, and outdoor patio.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 105.295%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 300 De Haro, located at 300 De Haro Street in San Francisco on a 0.62 acre site, requested and is being recommended for a reservation of $6,739,725 in annual federal tax credits and $101,746,126 of tax-exempt bond cap to finance the new construction of 425 units of housing, consisting of 421 restricted rental units and 4 unrestricted manager's units. The project will have 425 studio units, serving tenants with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in April 2027. The project will be developed by MRK Partners Inc. and will be located in Senate District 11 and Assembly District 17.

Project Number CA-24-745

Project Name 300 De Haro
Site Address: 300 De Haro Street
San Francisco, CA 94103
County: San Francisco
Census Tract: 607.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$6,739,725	$0
Recommended:	$6,739,725	$0

Tax-Exempt Bond Allocation
Recommended: $101,746,126

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	De Haro MRK LLC
Contact:	Sydne Garchik
Address:	2711 North Sepulveda Boulevard # 526 Manhattan Beach, CA 90266
Phone:	424.999.4581
Email:	sgarchik@mrkpartners.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	300 De Haro Holdings LLC Pacific Southwest Community Development Corporation
General Partner Type:	Joint Venture
Parent Company(ies):	Aspire Housing LLC Pacific Southwest Community Development Corporation
Developer:	MRK Partners Inc.
Investor/Consultant:	R4 Capital LLC
Management Agent:	WinnResidential California LP

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	425
No. / % of Low Income Units:	421 100.00%
Average Targeted Affordability:	60.02%
Federal Set-Aside Elected:	40%/60% Average Income
Federal Subsidy:	Tax-Exempt

Information

Housing Type:	Non-Targeted
Geographic Area:	San Francisco County
State Ceiling Pool:	N/A
Set Aside:	N/A
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	58	14%
50% AMI:	43	10%
60% AMI:	103	24%
70% AMI*:	217	52%

*CTCAC restricted only

Unit Mix

425 SRO/Studio Units
425 Total Units

Unit Type & Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
58 SRO/Studio	30%	$1,028
43 SRO/Studio	50%	$1,713
103 SRO/Studio	60%	$2,056
217 SRO/Studio	70%	$2,399
4 SRO/Studio	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$16,350,000
Construction Costs	$102,581,300
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$7,287,543
Soft Cost Contingency	$1,454,691
Relocation	$0
Architectural/Engineering	$5,262,999
Const. Interest, Perm. Financing	$22,278,244
Legal Fees	$1,858,000
Reserves	$2,359,580
Other Costs	$16,460,599
Developer Fee	$28,107,159
Commercial Costs	$0
Total	**$204,000,115**

Residential

Construction Cost Per Square Foot:	$537
Per Unit Cost:	$480,000
Estimated Hard Per Unit Cost:	$218,050
True Cash Per Unit Cost*:	$417,184
Bond Allocation Per Unit:	$239,403
Bond Allocation Per Restricted Rental Unit:	$498,756

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$101,746,126
Citibank: Recycled Tax-Exempt	$16,324,009
Citibank: Taxable	$16,341,466
Net Operating Income	$2,667,061
Deferred Costs	$4,053,591
Deferred Developer Fee	$26,696,839
General Partner Equity	$17,200,000
Tax Credit Equity	$18,971,023

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$94,082,805
Net Operating Income	$2,667,061
Deferred Developer Fee	$26,696,839
General Partner Equity	$17,200,000
Tax Credit Equity	$63,353,410
TOTAL	**$204,000,115**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$168,642,956
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	$168,642,956
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$6,739,725
Approved Developer Fee (in Project Cost & Eligible Basis):	$28,107,159
Federal Tax Credit Factor:	$0.94000

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
This Project's annual per unit operating expense total is below the CTCAC published per unit operating minimums of $8,925. As allowed by CTCAC Regulation Section 10327(g)(1), CTCAC approves an annual per unit operating expense total of $7,587 on agreement of the permanent lender and equity investor.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 134.510%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Avanzando San Ysidro, located at two sites (see below) in San Diego County on a total of 1.5 acres, requested and is being recommended for a reservation of $4,609,523 in annual federal tax credits and $49,000,000 of tax-exempt bond cap to finance the new construction of 103 units of housing, consisting of 101 restricted rental units and 2 unrestricted manager's units. The project will have 26 one-bedroom units, 25 two-bedroom units, and 52 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in May 2027. The project will be developed by Hitzke Development Corporation and will be located in Senate District 18 and Assembly District 80.

The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC), Regional Early Action Planning (REAP), and Infrastructure Infill Grant - Catalytic Qualifying Infill Area (IIG-C) programs of HCD.

Project Number CA-24-746

Project Name Avanzando San Ysidro

Site Address:	Site 1: Cypress 125 Cypress Drive San Diego, CA 92173 County: San Diego Census Tract: 100.13	Site 2: Cottonwood & South Vista 210-240 South Vista Avenue & 317 Cottonwood Road San Diego, CA 92173 County: San Diego Census Tract: 100.13

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,609,523	$0
Recommended:	$4,609,523	$0

Tax-Exempt Bond Allocation
Recommended: $49,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Avanzando San Ysidro, LP.
Contact:	Georgette Gomez
Address:	119 West Hall Avenue San Ysidro, CA 92173
Phone:	619-428-1115
Email:	georgetteg@casafamiliar.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CalHFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citi Community Capital

Development Team

General Partner(s) or Principal Owner(s):	Avanzando San Ysidro, LLC Hitzke Development Corporation
General Partner Type:	Joint Venture
Parent Company(ies):	Casa Familiar, Inc. Hitzke Development Corporation
Developer:	Hitzke Development Corporation
Investor/Consultant:	PNC Real Estate
Management Agent:	ConAm Management Corporation Casa Familiar, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	3	
Total # of Units:	103	
No. / % of Low Income Units:	101	100.00%
Average Targeted Affordability:	46.34%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Diego County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	11	11%
40% AMI:	40	40%
50% AMI:	25	25%
60% AMI:	25	25%

Unit Mix

26	1-Bedroom Units
25	2-Bedroom Units
52	3-Bedroom Units
103	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
3	1 Bedroom	30%	$852
15	1 Bedroom	40%	$1,136
8	1 Bedroom	50%	$1,420
4	2 Bedrooms	30%	$1,023
12	2 Bedrooms	40%	$1,364
4	2 Bedrooms	50%	$1,705
5	2 Bedrooms	60%	$2,046
4	3 Bedrooms	30%	$1,182
13	3 Bedrooms	40%	$1,576
13	3 Bedrooms	50%	$1,970
20	3 Bedrooms	60%	$2,364
2	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$800,000
Construction Costs	$58,929,044
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,200,000
Soft Cost Contingency	$321,240
Relocation	$375,000
Architectural/Engineering	$1,298,246
Const. Interest, Perm. Financing	$7,314,650
Legal Fees	$533,336
Reserves	$425,000
Other Costs	$4,203,450
Developer Fee	$15,004,901
Commercial Costs	$1,934,500
Total	**$94,339,367**

Residential

Construction Cost Per Square Foot:	$532
Per Unit Cost:	$897,135
Estimated Hard Per Unit Cost:	$513,833
True Cash Per Unit Cost*:	$884,654
Bond Allocation Per Unit:	$475,728
Bond Allocation Per Restricted Rental Unit:	$485,149

Construction Financing

Source	Amount
Citi: Tax-Exempt	$49,000,000
Citi: Taxable	$2,250,000
Citi: Recycled Tax-Exempt	$12,500,000
County of San Diego	$2,760,000
Tax Credit Equity	$27,829,367

Permanent Financing

Source	Amount
Citi	$3,695,000
HCD: AHSC	$20,200,000
HCD: REAP	$4,125,000
SDHC[1]: IIG-C	$6,019,116
SDHC[1]	$4,120,000
County of San Diego	$2,760,000
Managing General Partner Equity	$90
Administrative General Partner Equity	$10
Developer Fee Contribution	$12,004,901
Deferred Developer Fee	$1,312,402
Tax Credit Equity	$40,102,848
TOTAL	**$94,339,367**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]San Diego Housing Commission

Determination of Credit Amount(s)

Requested Eligible Basis:	$88,836,834
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$115,487,884
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,609,523
Approved Developer Fee (in Project Cost & Eligible Basis):	$15,004,901
Federal Tax Credit Factor:	$0.87000

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 $897,135. The applicant noted that the per unit cost is attributed to prevailing wages, construction loan interest, framing costs related to construction of townhomes, roof decking materials, and a soil stability program.

This project intends to make the Tax Credit Units available for eventual tenant ownership at the end of the initial 15 year compliance period. The applicant provided a plan which should be updated in the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 111.951%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Century + Restorative Care Village Phase I, located at 1321 North Mission Road in Los Angeles on a 1.35 acre site, requested and is being recommended for a reservation of $4,903,823 in annual federal tax credits and $53,223,000 of tax-exempt bond cap to finance the new construction of 146 units of housing, consisting of 145 restricted rental units and 1 unrestricted manager's unit. The project will have 80 studio units, 57 one-bedroom units, and 9 two-bedroom units, serving special needs tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in July 2027. The project will be developed by Century Affordable Development, Inc. and will be located in Senate District 26 and Assembly District 54.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) and No Place Like Home (NPLH) programs of HCD.

Project Number CA-24-750

Project Name Century + Restorative Care Village Phase I

Site Address:	1321 North Mission Road Los Angeles, CA 90033
County:	Los Angeles
Census Tract:	1999.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,903,823	$0
Recommended:	$4,903,823	$0

Tax-Exempt Bond Allocation

Recommended: $53,223,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Century Affordable Development, Inc.
Contact:	Oscar Alvarado
Address:	1000 Corporate Pointe Culver City, CA 90230
Phone:	(310) 642-2079
Email:	oalvarado@century.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Los Angeles County Development Authority
Bond Counsel:	Stradling, Yocca, Carlson & Rauth
Private Placement Purchaser:	Wells Fargo Bank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Century Affordable Development, Inc.
General Partner Type:	Nonprofit
Parent Company(ies):	Century Affordable Development, Inc.
Developer:	Century Affordable Development, Inc.
Investor/Consultant:	California Housing Partnership Corporation
Management Agent:	Century Villages Property Management, LLC

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	146	
No. / % of Low Income Units:	145	100.00%
Average Targeted Affordability:	44.07%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (75 Units - 52%)	

Information

Housing Type:	Special Needs
Geographic Area:	Balance of Los Angeles County
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	75
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	77	53%
60% AMI:	68	47%

Unit Mix

80	SRO/Studio Units
57	1-Bedroom Units
9	2-Bedroom Units
146	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
56	SRO/Studio	30%	$728
4	1 Bedroom	30%	$780
12	SRO/Studio	30%	$728
3	1 Bedroom	30%	$780
2	2 Bedrooms	30%	$936
12	SRO/Studio	60%	$1,456
50	1 Bedroom	60%	$1,560
6	2 Bedrooms	60%	$1,872
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$1,081,844
Construction Costs	$66,668,256
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,375,000
Soft Cost Contingency	$442,899
Relocation	$0
Architectural/Engineering	$4,056,059
Const. Interest, Perm. Financing	$11,176,106
Legal Fees	$215,000
Reserves	$874,626
Other Costs	$2,941,738
Developer Fee	$12,300,560
Commercial Costs	$0
Total	**$103,132,088**

Residential

Construction Cost Per Square Foot:	$604
Per Unit Cost:	$706,384
Estimated Hard Per Unit Cost:	$387,531
True Cash Per Unit Cost*:	$641,312
Bond Allocation Per Unit:	$364,541
Bond Allocation Per Restricted Rental Unit:	$367,055

Construction Financing

Source	Amount
Wells Fargo: Tax-Exempt	$53,223,000
Wells Fargo: Taxable	$23,561,224
LACDA²: NPLH	$9,900,000
Deferred Costs	$2,381,826
Deferred Developer Fee	$9,500,560
Tax Credit Equity	$4,565,478

Permanent Financing

Source	Amount
CCRC¹	$11,035,000
HCD: AHSC	$25,000,000
LACDA²: NPLH	$10,000,000
Deferred Developer Fee	$9,500,560
Tax Credit Equity	$47,596,528
TOTAL	**$103,132,088**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
¹California Community Reinvestment Corporation
²Los Angeles County Development Authority

Determination of Credit Amount(s)

Requested Eligible Basis:	$94,304,296
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$122,595,585
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,903,823
Approved Developer Fee (in Project Cost & Eligible Basis):	$12,300,560
Federal Tax Credit Factor:	$0.97060

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
The project will restrict 75 (52%) of the units to serve special needs tenants, consisting of homeless populations.

The current legal description is part of a larger site and the project site's parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-750 must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 107.875%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Weingart Tower 1B, located at 554-562 South San Pedro Street in Los Angeles on a 0.23 acre site, requested and is being recommended for a reservation of $4,158,853 in annual federal tax credits and $45,163,792 of tax-exempt bond cap to finance the new construction of 104 units of housing, consisting of 103 restricted rental units and 1 unrestricted manager's unit. The project will have 103 studio units, 1 two-bedroom unit, serving special needs tenants with rents affordable to households earning 20%-50% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in March 2027. The project will be developed by Weingart Center Association and will be located in Senate District 28 and Assembly District 57.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH) and Multifamily Housing Program (MHP) programs of HCD.

Project Number	CA-24-751
Project Name	Weingart Tower 1B
Site Address:	554-562 South San Pedro Street Los Angeles, CA 90013
County:	Los Angeles
Census Tract:	2063.03

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,158,853	$0
Recommended:	$4,158,853	$0

Tax-Exempt Bond Allocation

Recommended:	$45,163,792

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Weingart Tower 1B, LP
Contact:	Ben Rosen
Address:	566 South San Pedro Street Los Angeles, CA 90013
Phone:	213.689.2183
Email:	benr@weingart.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Los Angeles Housing Department
Bond Counsel:	Kutak Rock LLP
Private Placement Purchaser:	U.S. Bank National Association

Development Team

General Partner(s) or Principal Owner(s):	WC Towers 1B LLC Related/554 S. San Pedro Development Co., LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Weingart Center Association The Related Companies of California, LLC
Developer:	Weingart Center Association
Investor/Consultant:	US Bank Corp.
Management Agent:	Barker Management, Incorporated

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	104
No. / % of Low Income Units:	103 100.00%
Average Targeted Affordability:	29.86%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (103 Units - 100%)

Information

Housing Type:	Special Needs
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	103
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	81	79%
50% AMI:	22	21%

Unit Mix

103	SRO/Studio Units
1	2-Bedroom Units
104	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
28	SRO/Studio	20%	$485
40	SRO/Studio	30%	$728
13	SRO/Studio	30%	$728
22	SRO/Studio	50%	$1,021
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$4,149,749
Construction Costs	$56,098,772
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$4,079,100
Soft Cost Contingency	$550,000
Relocation	$0
Architectural/Engineering	$884,000
Const. Interest, Perm. Financing	$5,787,985
Legal Fees	$538,000
Reserves	$1,260,918
Other Costs	$6,247,809
Developer Fee	$10,431,905
Commercial Costs	$0
Total	**$90,028,238**

Residential

Construction Cost Per Square Foot:	$1,048
Per Unit Cost:	$865,656
Estimated Hard Per Unit Cost:	$448,683
True Cash Per Unit Cost*:	$853,637
Bond Allocation Per Unit:	$434,267
Bond Allocation Per Restricted Rental Unit:	$438,483

Construction Financing

Source	Amount
U.S. Bank: Tax Exempt	$45,163,792
LACDA[1]: NPLH	$10,078,000
LAHD: HHH	$16,000,000
HHH: Deferred Interest	$881,000
Deferred Costs	$1,155,086
General Partner Contribution	$7,931,905
Deferred Developer Fee	$1,250,000
General Partner Equity	$100
Tax Credit Equity	$7,568,355

Permanent Financing

Source	Amount
U.S. Bank	$10,310,000
HCD: MHP	$6,985,455
LACDA[1]: NPLH	$10,078,000
LAHD: HHH	$16,000,000
HHH: Deferred Interest	$881,000
General Partner Contribution	$7,931,905
General Partner Equity	$100
Tax Credit Equity	$37,841,778
TOTAL	**$90,028,238**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Los Angeles County Development Authority

Determination of Credit Amount(s)

Requested Eligible Basis:	$79,977,944
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$103,971,327
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,158,853
Approved Developer Fee (in Project Cost & Eligible Basis):	$10,431,905
Federal Tax Credit Factor:	$0.90991

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 development cost of $853,637 per unit. Applicant noted costs are due to prevailing wage requirements, construction costs associated with small build site staging, and building an 11 story high-rise. Additionally, applicant noted all units would be fully furnished.

The proposed rent does not include a utility allowance. The owner will pay for all utilities.

The project will restrict 103 (100%) of the units to serve special needs tenants, consisting of homeless individuals.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 108.815%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Harrington Grove Apartments, located at 791 Harrington Way in Folsom on a 1.94 acre site, requested and is being recommended for a reservation of $1,184,988 in annual federal tax credits and $13,273,135 of tax-exempt bond cap to finance the new construction of 52 units of housing, consisting of 51 restricted rental units and 1 unrestricted manager's unit. The project will have 24 one-bedroom units, 15 two-bedroom units, and 13 three-bedroom units, serving families with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in July 2025 and be completed in September 2026. The project will be developed by West Development Ventures, LLC and will be located in Senate District 6 and Assembly District 7.

Project Number	CA-24-753

Project Name	Harrington Grove Apartments
Site Address:	791 Harrington Way Folsom, CA 95630
County:	Sacramento
Census Tract:	84.03

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,184,988	$0
Recommended:	$1,184,988	$0

Tax-Exempt Bond Allocation	
Recommended:	$13,273,135

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	West Development Ventures, LLC
Contact:	Mike Kelley
Address:	520 Capitol Mall, Suite 150 Sacramento, CA 95814
Phone:	(916) 834-5986
Email:	mikek@westdv.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	West Development Ventures, LLC Central Valley Coalition for Affordable Housing Pacific West Communities, Inc.
General Partner Type:	Joint Venture
Parent Company(ies):	West Development Ventures, LLC Central Valley Coalition for Affordable Housing Pacific West Communities, Inc.
Developer:	West Development Ventures, LLC
Investor/Consultant:	Boston Financial
Management Agent:	Aperto Property Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	2	
Total # of Units:	52	
No. / % of Low Income Units:	51	100.00%
Average Targeted Affordability:	59.42%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	Capital Region
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	6	12%
50% AMI:	7	14%
60% AMI:	27	53%
80% AMI*:	11	22%

*CTCAC restricted only

Unit Mix

24	1-Bedroom Units
15	2-Bedroom Units
13	3-Bedroom Units
52	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
3	1 Bedroom	30%	$663
3	1 Bedroom	50%	$1,105
13	1 Bedroom	60%	$1,326
5	1 Bedroom	80%	$1,769
2	2 Bedrooms	30%	$795
2	2 Bedrooms	50%	$1,326
7	2 Bedrooms	60%	$1,591
3	2 Bedrooms	80%	$2,122
1	3 Bedrooms	30%	$919
2	3 Bedrooms	50%	$1,532
7	3 Bedrooms	60%	$1,839
3	3 Bedrooms	80%	$2,452
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,450,000
Construction Costs	$14,486,547
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$724,000
Soft Cost Contingency	$200,000
Relocation	$0
Architectural/Engineering	$900,000
Const. Interest, Perm. Financing	$1,655,300
Legal Fees	$120,000
Reserves	$283,064
Other Costs	$2,022,943
Developer Fee	$2,972,377
Commercial Costs	$0
Total	**$24,814,231**

Residential	
Construction Cost Per Square Foot:	$322
Per Unit Cost:	$477,197
Estimated Hard Per Unit Cost:	$244,374
True Cash Per Unit Cost*:	$468,065
Bond Allocation Per Unit:	$255,253
Bond Allocation Per Restricted Rental Unit:	$331,828

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$13,273,135
Bonneville: Recycled Tax-Exempt	$4,555,000
City of Folsom	$2,700,000
Deferred Costs	$283,064
Deferred Developer Fee	$2,972,077
Tax Credit Equity	$1,030,955

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$6,775,000
Bonneville: Recycled Tax-Exempt	$4,555,000
City of Folsom	$2,700,000
Deferred Developer Fee	$474,835
Tax Credit Equity	$10,309,396
TOTAL	**$24,814,231**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$22,788,224
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$29,624,691
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,184,988
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,972,377
Federal Tax Credit Factor:	$0.87000

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 84.399%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Oak View Ranch Senior Apartments, located at 24960 Adams Avenue in Murrieta on a 1.47 acre site, requested and is being recommended for a reservation of $1,737,117 in annual federal tax credits and $19,066,355 of tax-exempt bond cap to finance the new construction of 81 units of housing, consisting of 80 restricted rental units and 1 unrestricted manager's unit. The project will have 72 one-bedroom units, and 9 two-bedroom units, serving special needs tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in December 2026. The project will be developed by National Community Renaissance of California and will be located in Senate District 32 and Assembly District 71.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-754

Project Name	Oak View Ranch Senior Apartments
Site Address:	24960 Adams Avenue Murrieta, CA 92562
County:	Riverside
Census Tract:	498.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,737,117	$0
Recommended:	$1,737,117	$0

Tax-Exempt Bond Allocation	
Recommended:	$19,066,355

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	National Community Renaissance of California
Contact:	Lesley Hampton
Address:	9692 Haven Avenue, Suite 100 Rancho Cucamonga, CA 91730
Phone:	909-204-3444
Email:	lhampton@nationalcore.org

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CSCDA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Bank of America, N.A.

Development Team

General Partner(s) or Principal Owner(s):	NCRC Murrieta Senior MGP LLC
General Partner Type:	Nonprofit
Parent Company(ies):	National Community Renaissance of California
Developer:	National Community Renaissance of California
Investor/Consultant:	Bank of America
Management Agent:	National Community Renaissance of California

Project Information

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	81
No. / % of Low Income Units:	80 100.00%
Average Targeted Affordability:	39.99%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (40 Units - 50%) / American Rescue Plan Act (ARPA)

Information

Housing Type:	Special Needs
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	40
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Cynthia Compton

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	40	50%
40% AMI:	20	25%
60% AMI:	20	25%

Unit Mix

72 1-Bedroom Units
9 2-Bedroom Units
81 Total Units

Unit Type & Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
35 1 Bedroom	30%	$576
5 2 Bedrooms	30%	$691
18 1 Bedroom	40%	$769
2 2 Bedrooms	40%	$922
19 1 Bedroom	60%	$1,153
1 2 Bedrooms	60%	$1,383
1 2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application

Land and Acquisition	$1,335,000
Construction Costs	$21,989,307
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,094,466
Soft Cost Contingency	$174,890
Relocation	$0
Architectural/Engineering	$1,375,000
Const. Interest, Perm. Financing	$2,329,389
Legal Fees	$90,000
Reserves	$285,861
Other Costs	$3,418,712
Developer Fee	$4,357,317
Commercial Costs	$0
Total	**$36,449,942**

Residential

Construction Cost Per Square Foot:	$289
Per Unit Cost:	$449,999
Estimated Hard Per Unit Cost:	$233,199
True Cash Per Unit Cost*:	$430,799
Bond Allocation Per Unit:	$235,387
Bond Allocation Per Restricted Rental Unit:	$238,329

Construction Financing

Source	Amount
Bank of America: Tax-Exempt	$19,066,355
MHA[1]: Land	$1,260,000
MHA[1]: ARPA Grant	$1,500,000
County of Riverside	$3,227,147
Sponsor Loan: TRFF[2] Grant	$1,000,000
Fee Waiver	$526,400
Accrued Interest	$228,844
Deferred Costs	$1,561,390
Developer Fee Contribution	$2,152,202
Deferred Developer Fee	$1,028,834
General Partner Equity	$100
Tax Credit Equity	$4,898,670

Permanent Financing

Source	Amount
Bank of America: Tax-Exempt	$5,424,662
MHA[1]: Land	$1,260,000
MHA[1]: ARPA Grant	$1,500,000
County of Riverside	$7,000,000
Sponsor Loan: TRFF[2] Grant	$1,000,000
Fee Wavier	$526,400
Accrued Interest	$228,844
Developer Fee Contribution	$2,152,202
Deferred Developer Fee	$1,028,834
General Partner Equity	$100
Tax Credit Equity	$16,328,900
TOTAL	**$36,449,942**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Murrieta Housing Authority
[2]The Rauch Family Foundation

Determination of Credit Amount(s)

Requested Eligible Basis:	$33,406,100
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$43,427,930
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$1,737,117
Approved Developer Fee (in Project Cost & Eligible Basis):	$4,357,317
Federal Tax Credit Factor:	$0.94000

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 132.037%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Viscar Terrace Apartments, located at 40475 Vista Murrieta and 40600 Myers Lane in Murrieta on a 5.74 acre site, requested and is being recommended for a reservation of $5,091,936 in annual federal tax credits and $23,316,924 in total state tax credits and $52,265,807 of tax-exempt bond cap to finance the new construction of 172 units of housing, consisting of 170 restricted rental units and 2 unrestricted manager's units. The project will have 78 one-bedroom units, 48 two-bedroom units, 38 three-bedroom units, and 8 four-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Etapes Corporation and will be located in Senate District 28 and Assembly District 67.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-756
Project Name	Viscar Terrace Apartments
Site Address:	40475 Vista Murrieta and 40600 Myers Lane Murrieta, CA 92562
County:	Riverside
Census Tract:	432.06

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$5,091,936	$23,316,924
Recommended:	$5,091,936	$23,316,924

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$52,265,807

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Viscar Terrace LP
Applicant for State Credits:	Rio Hondo Community Development Corporation
Contact:	Tung Tran
Address:	13681 Newport Avenue, Suite 8230 Tustin, CA 92780
Phone:	714-330-9987
Email:	ttran@etapescorp.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Auth.
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Viscar Terrace LLC Rio Hondo Community Development Corporation
General Partner Type:	Joint Venture
Parent Company(ies):	TEREDS LLC Rio Hondo Community Development Corporation
Developer:	Etapes Corporation
Investor/Consultant:	U.S. Bank
Management Agent:	FPI Management, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	5	
Total # of Units:	172	
No. / % of Low Income Units:	170	100.00%
Average Targeted Affordability:	50.53%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (68 Units - 40%)	

Information

Housing Type:	Large Family
Geographic Area:	Inland Empire Region
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	N/A
CDLAC Project Analyst:	Danielle Stevenson
CTCAC Project Analyst:	Nick White

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	51	30%
40% AMI:	17	10%
60% AMI:	76	45%
70% AMI*:	26	15%

*CTCAC restricted only

Unit Mix

78	1-Bedroom Units
48	2-Bedroom Units
38	3-Bedroom Units
8	4-Bedroom Units
172	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
11	1 Bedroom	30%	$576
18	2 Bedrooms	30%	$691
18	3 Bedrooms	30%	$799
4	4 Bedrooms	30%	$891
5	1 Bedroom	40%	$769
4	2 Bedrooms	40%	$922
4	3 Bedrooms	40%	$1,066
4	4 Bedrooms	40%	$1,189
50	1 Bedroom	60%	$1,153
18	2 Bedrooms	60%	$1,383
8	3 Bedrooms	60%	$1,599
12	1 Bedroom	70%	$1,345
7	2 Bedrooms	70%	$1,613
7	3 Bedrooms	70%	$1,865
1	2 Bedrooms	Manager’s Unit	$0
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$4,770,471
Construction Costs	$65,032,268
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,239,113
Soft Cost Contingency	$565,697
Relocation	$0
Architectural/Engineering	$2,137,000
Const. Interest, Perm. Financing	$11,493,048
Legal Fees	$354,214
Reserves	$1,518,843
Other Costs	$5,459,771
Developer Fee	$12,772,414
Commercial Costs	$0
Total	**$107,342,841**

Residential	
Construction Cost Per Square Foot:	$416
Per Unit Cost:	$624,086
Estimated Hard Per Unit Cost:	$329,862
True Cash Per Unit Cost*:	$578,457
Bond Allocation Per Unit:	$303,871
Bond Allocation Per Restricted Rental Unit:	$362,957

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$52,265,807
Citibank: Taxable	$31,874,193
Net Operating Income	$837,158
Deferred Costs	$1,599,176
Deferred Developer Fee	$10,669,946
Tax Credit Equity	$10,096,561

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$30,692,888
Net Operating Income	$837,158
Deferred Developer Fee	$7,848,276
Solar Tax Credit Equity	$409,500
Tax Credit Equity	$67,555,019
TOTAL	**$107,342,841**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$97,921,843
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$127,298,396
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,091,936
Total State Credit:	$23,316,924
Approved Developer Fee (in Project Cost & Eligible Basis):	$12,772,414
Federal Tax Credit Factor:	$0.91000
State Tax Credit Factor:	$0.91000

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:
The current legal description is part of a larger site and the project site's parcel (legal description and APN) have not yet been finalized. The legal description and APN for CA-24-756 must be completed as part of the placed in service package.

The project has received tentative approval from the Housing Authority of the County of Riverside to use the Energy Efficient Utility Allowance schedule. The project is required to provide full approval from the Housing Authority to use these utility allowances at the placed in service submission.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 80.353%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Tampico Motel Conversion, located at 120 South State College Boulevard and 2016 East Center Street in Anaheim on a 0.51 acre site, requested and is being recommended for a reservation of $1,122,797 in annual federal tax credits and $13,105,723 of tax-exempt bond cap to finance the new construction & adaptive reuse of 32 units of housing, consisting of 31 restricted rental units and 1 unrestricted manager's unit. The project will have 31 studio units, 1 one-bedroom unit, serving special needs tenants with rents affordable to households earning 30% of area median income (AMI). The rehabilitation is expected to begin in June 2025 and be completed in September 2026. The project will be developed by Jamboree Housing Corporation and will be located in Senate District 34 and Assembly District 68.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-757
Project Name	Tampico Motel Conversion
Site Address:	120 South State College Boulevard and 2016 East Center Street Anaheim, CA 92806
County:	Orange
Census Tract:	864.02

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$1,122,797	$0
Recommended:	$1,122,797	$0

Tax-Exempt Bond Allocation
Recommended: $13,105,723

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Center Housing Partners LP
Contact:	Victoria Rodriguez
Address:	17701 Cowan Avenue, Suite 200 Irvine, CA 92614
Phone:	949-214-2325
Email:	vrodriguez@jamboreehousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Anaheim Housing Authority
Bond Counsel:	Stradling, Yocca, Carlson & Rauth
Private Placement Purchaser:	Banner Bank

Development Team

General Partner or Principal Owner:	JHC-Center LLC
General Partner Type:	For Profit
Parent Company:	Jamboree Housing Corporation
Developer:	Jamboree Housing Corporation
Investor/Consultant:	Boston Financial
Management Agent:	Quality Management Group

Project Information

Construction Type:	New Construction & Adaptive Reuse
Total # Residential Buildings:	2
Total # of Units:	32
No. / % of Low Income Units:	31 100.00%
Average Targeted Affordability:	12.85%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (31 Units - 100%)

Information

Housing Type:	Special Needs
Geographic Area:	Orange County
State Ceiling Pool:	New Construction
Set Aside:	N/A
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	31	100%

Unit Mix

31 SRO/Studio Units
1 1-Bedroom Units
32 Total Units

Unit Type & Number	2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
31 SRO/Studio	30%	$355
1 1 Bedroom	Manager Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$5,120,000
Construction Costs	$10,581,500
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$1,026,000
Soft Cost Contingency	$579,640
Relocation	$0
Architectural/Engineering	$675,000
Const. Interest, Perm. Financing	$1,698,231
Legal Fees	$300,000
Reserves	$852,411
Other Costs	$2,155,308
Developer Fee	$2,944,000
Commercial Costs	$0
Total	**$25,932,090**

Residential

Construction Cost Per Square Foot:	$958
Per Unit Cost:	$810,378
Estimated Hard Per Unit Cost:	$286,375
True Cash Per Unit Cost*:	$642,013
Bond Allocation Per Unit:	$409,554
Bond Allocation Per Restricted Rental Unit:	$422,765

Construction Financing

Source	Amount
Banner Bank: Tax-Exempt	$13,105,723
Banner Bank: Taxable	$694,277
AHA: HHAP¹	$1,822,960
Orangewood Foundation	$750,000
Seller Carryback	$5,120,000
Deferred Costs	$1,696,472
Deferred Developer Fee	$1,060,597
General Partner Equity	$694,000
Tax Credit Equity	$988,061

Permanent Financing

Source	Amount
Banner Bank: Tax-Exempt	$1,951,058
Anaheim Housing Authority (AHA)	$4,838,145
AHA: HHAP¹	$2,430,614
Orangewood Foundation	$750,000
Seller Carryback	$5,120,000
Deferred Developer Fee	$267,662
General Partner Equity	$694,000
Tax Credit Equity	$9,880,611
TOTAL	**$25,932,090**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
¹Homeless Housing, Assistance and Prevention

Determination of Credit Amount(s)

Requested Eligible Basis:	$18,047,089
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$4,611,500
Applicable Fraction:	100.00%
Qualified Basis:	$23,461,216
Qualified Basis (Acquisition):	$4,611,500
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$938,337
Maximum Annual Federal Credit, Acquisition:	$184,460
Total Maximum Annual Federal Credit:	$1,122,797
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,944,000
Federal Tax Credit Factor:	$0.88000

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
This project will include the adaptive reuse of an existing 34-room motel first built in the 1960s with an addition completed in the 1980s. The buildings are currently vacant. Upon completion, the project will provide 31 LIHTC units and 1 manager unit.

The project will restrict 31 (100%) of the units to serve special needs tenants consisting of transition age youth.

The proposed rent does not include a utility allowance. The owner will pay for all utilities.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 106.531%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Locke Lofts, located at 345 North Madison Avenue in Los Angeles on a 0.8 acre site, requested and is being recommended for a reservation of $4,123,078 in annual federal tax credits and $50,000,000 of tax-exempt bond cap to finance the new construction of 148 units of housing, consisting of 146 restricted rental units and 2 unrestricted manager's units. The project will have 119 studio units, 18 one-bedroom units, and 11 two-bedroom units, serving tenants with rents affordable to households earning 20%-40% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by Pacific West Communities, Inc. and will be located in Senate District 24 and Assembly District 53.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the Affordable Housing and Sustainable Communities (AHSC) program of HCD.

Project Number	CA-24-759
Project Name	Locke Lofts
Site Address:	345 North Madison Avenue Los Angeles, CA 90004
County:	Los Angeles
Census Tract:	1927.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,123,078	$0
Recommended:	$4,123,078	$0

Tax-Exempt Bond Allocation

Recommended:	$50,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Locke Lofts Associates, a California Limited Partnership
Contact:	Caleb Roope
Address:	430 East State Street, Suite 100 Eagle, ID 83616
Phone:	(208) 461-0022
Email:	calebr@tpchousing.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Los Angeles Housing Department
Bond Counsel:	Kutak Rock, LLP
Private Placement Purchaser:	California Bank & Trust, a division of Zions Bancorporation, N.A.

Development Team

General Partner(s) or Principal Owner(s):	TPC Holdings IX, LLC Flexible PSH Solutions, Inc.
General Partner Type:	Joint Venture
Parent Company(ies):	Pacific West Communities, Inc. Flexible PSH Solutions, Inc.
Developer:	Pacific West Communities, Inc.
Investor/Consultant:	Boston Financial Investment Management
Management Agent:	The John Stewart Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	148	
No. / % of Low Income Units:	146	100.00%
Average Targeted Affordability:	29.18%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (100 Units - 68%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	City of Los Angeles
State Ceiling Pool:	New Construction
Set Aside:	Homeless Set Aside
Homeless Set Aside Units:	100
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Brett Andersen

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
20% AMI:	58	40%
30% AMI:	42	29%
40% AMI:	46	32%

Unit Mix

119	SRO/Studio Units
18	1-Bedroom Units
11	2-Bedroom Units
148	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
50	SRO/Studio	20%	$485
35	SRO/Studio	30%	$728
34	SRO/Studio	40%	$971
5	1 Bedroom	20%	$520
5	1 Bedroom	30%	$780
8	1 Bedroom	40%	$1,040
3	2 Bedrooms	20%	$624
2	2 Bedrooms	30%	$936
4	2 Bedrooms	40%	$1,248
2	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$13,055,000
Construction Costs	$52,026,986
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$5,140,000
Soft Cost Contingency	$800,000
Relocation	$76,550
Architectural/Engineering	$1,535,000
Const. Interest, Perm. Financing	$6,966,500
Legal Fees	$230,000
Reserves	$1,917,715
Other Costs	$2,677,787
Developer Fee	$10,342,167
Commercial Costs	$0
Total	**$94,767,705**

Residential	
Construction Cost Per Square Foot:	$755
Per Unit Cost:	$640,322
Estimated Hard Per Unit Cost:	$299,969
True Cash Per Unit Cost*:	$594,091
Bond Allocation Per Unit:	$337,838
Bond Allocation Per Restricted Rental Unit:	$342,466

Construction Financing

Source	Amount
CBT: Tax-Exempt	$50,000,000
CBT: Taxable	$23,614,784
Bonneville: Tax-Exempt	$5,000,000
Deferred Costs	$2,347,715
Deferred Developer Fee	$9,342,167
General Partner Equity	$1,000,000
Tax Credit Equity	$3,463,039

Permanent Financing

Source	Amount
California Bank & Trust (CBT)	$14,300,000
Bonneville	$5,000,000
HCD: AHSC	$20,000,000
LAHD: AHMP[1]	$12,995,146
Deferred Developer Fee	$6,842,167
General Partner Equity	$1,000,000
Tax Credit Equity	$34,630,392
TOTAL	**$94,767,705**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Los Angeles Housing Department: Affordable Housing Managed Pipeline

Determination of Credit Amount(s)

Requested Eligible Basis:	$79,289,953
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$103,076,939
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,123,078
Approved Developer Fee (in Project Cost & Eligible Basis):	$10,342,167
Federal Tax Credit Factor:	$0.83992

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
The project will restrict 100 (68%) of the units to serve special needs tenants, consisting of Homeless tenants.

The current legal description is part of a larger site and the project site's parcel legal description and APN have not yet been finalized. The legal description and APN for CA-24-759 must be completed as part of the placed in service package.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 122.062%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 160 Freelon, located at 160 Freelon Street in San Francisco on a 0.3 acre site, requested and is being recommended for a reservation of $4,603,977 in annual federal tax credits and $48,900,000 of tax-exempt bond cap to finance the new construction of 85 units of housing, consisting of 84 restricted rental units and 1 unrestricted manager's unit. The project will have 15 studio units, 24 one-bedroom units, 23 two-bedroom units, and 23 three-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in April 2027. The project will be developed by Related Irvine Development Company and will be located in Senate District 11 and Assembly District 17.

The project financing includes state funding from the Affordable Housing and Sustainable Communities Affordable Housing Development (AHSC AHD) program of HCD.

Project Number	CA-24-767
Project Name	160 Freelon
Site Address:	160 Freelon Street San Francisco, CA 94107
County:	San Francisco
Census Tract:	180.00

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,603,977	$0
Recommended:	$4,603,977	$0

Tax-Exempt Bond Allocation
Recommended: $48,900,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	160 Freelon Housing Partners, L.P.
Contact:	Ann Silverberg
Address:	44 Montgomery Street, Suite 1310 San Francisco, CA 94104
Phone:	(415) 677-4009
Email:	asilverberg@related.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	City and County of San Francisco
Bond Counsel:	Stradling, Yocca, Carlson & Rauth
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	Related/160 Freelon Development Co., LLC SFHDC 160 Freelon LLC
General Partner Type:	Joint Venture
Parent Company(ies):	The Related Companies of California, LLC San Francisco Housing Development Corporation
Developer:	Related Irvine Development Company
Investor/Consultant:	Raymond James Affordable Housing Investments, Inc.
Management Agent:	Related Management Company

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	85	
No. / % of Low Income Units:	84	100.00%
Average Targeted Affordability:	38.73%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	

Information

Housing Type:	Large Family
Geographic Area:	San Francisco County
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	22
CDLAC Project Analyst:	Jake Salle
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	22	26%
40% AMI:	30	36%
50% AMI:	14	17%
60% AMI:	18	21%

Unit Mix

15 SRO/Studio Units
24 1-Bedroom Units
23 2-Bedroom Units
23 3-Bedroom Units
85 Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
12	SRO/Studio	40%	$1,370
3	SRO/Studio	50%	$1,713
11	1 Bedroom	30%	$250
10	1 Bedroom	40%	$1,469
3	1 Bedroom	50%	$1,836
6	2 Bedrooms	30%	$250
4	2 Bedrooms	40%	$1,762
4	2 Bedrooms	50%	$2,203
8	2 Bedrooms	60%	$2,644
5	3 Bedrooms	30%	$250
4	3 Bedrooms	40%	$2,036
4	3 Bedrooms	50%	$2,545
10	3 Bedrooms	60%	$2,997
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$501
Construction Costs	$67,737,044
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,372,822
Soft Cost Contingency	$807,207
Relocation	$0
Architectural/Engineering	$3,565,977
Const. Interest, Perm. Financing	$14,725,720
Legal Fees	$470,040
Reserves	$565,000
Other Costs	$2,439,294
Developer Fee	$6,777,000
Commercial Costs	$0
Total	**$100,460,605**

Residential	
Construction Cost Per Square Foot:	$1,015
Per Unit Cost:	$1,181,889
Estimated Hard Per Unit Cost:	$697,370
True Cash Per Unit Cost*:	$1,172,748
Bond Allocation Per Unit:	$575,294
Bond Allocation Per Restricted Rental Unit:	$582,143

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$48,900,000
Citibank: Taxable	$16,511,096
SF MOHCD[1]	$22,577,921
SF MOHCD[1]: Accrued Interest	$1,776,000
Deferred Costs	$3,565,000
Deferred Developer Fee	$777,000
General Partner Equity	$100
Tax Credit Equity	$6,353,488

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$3,973,000
HCD: AHSC	$29,000,000
SF MOHCD[1]	$22,577,921
SF MOHCD[1]: Accrued Interest	$1,776,000
Deferred Developer Fee	$777,000
General Partner Equity	$100
Tax Credit Equity	$42,356,584
TOTAL	**$100,460,605**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]San Francisco Mayor's Office of Housing and Community Development

Determination of Credit Amount(s)

Requested Eligible Basis:	$88,546,874
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$115,110,936
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$4,603,977
Approved Developer Fee (in Project Cost & Eligible Basis):	$6,777,000
Federal Tax Credit Factor:	$0.92000

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 $1,172,748. The applicant noted that the per unit cost is affected by payment of prevailing wages, installation of a vapor intrusion mitigation system, and use of Type I-B construction that requires a deep pile foundation.

The property is owned by the City and County of San Francisco and leased to the applicant.

The current legal description is part of a larger site and the project site's legal description and APN have not yet been finalized. The legal description and APN for CA-24-767 must be completed as part of the Placed-in-Service package.

The project will restrict 22 of the units (26%) to serve special needs tenants consisting of homeless populations.

The proposed rent for the 22 special needs/homeless units does not include a utility allowance. The owner will pay for all utilities for these units.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
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
Total Points	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: 136.369%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Moreland Apartments, located at 4375 Payne Avenue in San Jose on a 7.08 acre site, requested and is being recommended for a reservation of $4,131,931 in annual federal tax credits and $55,894,252 of tax-exempt bond cap to finance the acquisition & rehabilitation of 160 units of housing, consisting of 159 restricted rental units and 1 unrestricted manager's unit. The project has 80 one-bedroom units, and 80 two-bedroom units, serving tenants with rents affordable to households earning 30%-80% of area median income (AMI). The construction is expected to begin in January 2025 and be completed in December 2025. The project will be developed by Gung Ho - Moreland, LLC and is located in Senate District 15 and

The project is currently at-risk, but is being recommended for a reservation of tax credits that will preserve affordability for an additional 55 years. The project will be receiving rental assistance in the form of HUD Section 8 Project-based Contract.

Project Number	CA-24-768
Project Name	Moreland Apartments
Site Address:	4375 Payne Avenue San Jose, CA 95117
County:	Santa Clara
Census Tract:	5063.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$4,131,931	$0
Recommended:	$4,131,931	$0

Tax-Exempt Bond Allocation
Recommended: $55,894,252

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Reliant - Moreland, LP
Contact:	Mike April
Address:	601 California Street, Suite 1150 San Francisco, CA 94108
Phone:	(415) 501-9605
Email:	mapril@reliantgroup.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citi Community Capital

Development Team

General Partner(s) or Principal Owner(s):	Gung Ho - Moreland, LLC Rainbow - Moreland, LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Gung Ho Partners, LLC Rainbow Housing Assistance Corporation
Developer:	Gung Ho - Moreland, LLC
Investor/Consultant:	R4 MACA Acquisition LP
Management Agent:	Cornerstone Reliant GP FKA Reliant Property Management, Inc.

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	8	
Total # of Units:	160	
No. / % of Low Income Units:	159	100.00%
Average Targeted Affordability:	44.22%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Contract (159 Units - 99%)	

Information

Housing Type:	At-Risk
Geographic Area:	South and West Bay Region
State Ceiling Pool:	Preservation
Set Aside:	N/A
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	49	31%
50% AMI:	108	68%
80% AMI*:	2	1%

*CTCAC restricted only

Unit Mix

80	1-Bedroom Units
80	2-Bedroom Units
160	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
55	1 Bedroom	50%	$1,728
48	2 Bedrooms	50%	$2,073
2	2 Bedrooms	50%	$2,073
3	2 Bedrooms	50%	$2,073
25	1 Bedroom	30%	$1,037
21	2 Bedrooms	30%	$1,244
3	2 Bedrooms	30%	$1,244
1	2 Bedrooms	80%	$3,318
1	2 Bedrooms	80%	$3,318
1	2 Bedrooms	Manager's Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$73,411,883
Construction Costs	$0
Rehabilitation Costs	$16,995,030
Construction Hard Cost Contingency	$1,699,503
Soft Cost Contingency	$450,000
Relocation	$383,460
Architectural/Engineering	$250,000
Const. Interest, Perm. Financing	$9,914,437
Legal Fees	$470,681
Reserves	$1,378,301
Other Costs	$1,274,188
Developer Fee	$12,485,142
Commercial Costs	$0
Total	**$118,712,625**

Residential	
Construction Cost Per Square Foot:	$137
Per Unit Cost:	$741,954
Estimated Hard Per Unit Cost:	$90,685
True Cash Per Unit Cost*:	$690,166
Bond Allocation Per Unit:	$349,339
Bond Allocation Per Restricted Rental Unit:	$356,014

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$55,894,252
Citibank: Recycled Tax-Exempt	$14,455,748
Net Operating Income	$3,309,657
Deferred Developer Fee	$10,595,091
Tax Credit Equity	$34,457,878

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$45,894,252
Citibank: Recycled Tax-Exempt	$14,455,748
CMFA[1]: Subordinate Tax-Exempt	$10,000,000
Net Operating Income	$3,309,657
Deferred Developer Fee	$8,286,132
Tax Credit Equity	$36,766,836
TOTAL	**$118,712,625**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]California Municipal Finance Authority

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$25,262,867
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$70,456,560
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$32,841,727
Qualified Basis (Acquisition):	$70,456,560
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$1,313,669
Maximum Annual Federal Credit, Acquisition:	$2,818,262
Total Maximum Annual Federal Credit:	$4,131,931
Approved Developer Fee (in Project Cost & Eligible Basis):	$12,485,142
Federal Tax Credit Factor:	$0.88982

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 $741,954. The applicant noted that the per unit cost is attributed to the full site renovation, contingency, construction costs, acquisition costs for ten buildings, and construction interest and holding costs.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 146.746%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

The project, 4575 Scotts Valley Apartments, located at 4575 Scotts Valley Drive in Scotts Valley on a 2.3 acre site, requested and is being recommended for a reservation of $3,896,318 in annual federal tax credits and $16,138,146 in total state tax credits and $41,923,146 of tax-exempt bond cap to finance the new construction of 100 units of housing, consisting of 99 restricted rental units and 1 unrestricted manager's unit. The project will have 21 one-bedroom units, 40 two-bedroom units, and 39 three-bedroom units, serving families with rents affordable to households earning 30%-70% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in March 2027. The project will be developed by CRP Affordable Housing & Community Development LLC and will be located in Senate District 17 and Assembly District 28.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers.

Project Number	CA-24-771
Project Name	4575 Scotts Valley Apartments
Site Address:	4575 Scotts Valley Drive Scotts Valley, CA 95066
County:	Santa Cruz
Census Tract:	1209.02

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$3,896,318	$16,138,146
Recommended:	$3,896,318	$16,138,146

* The applicant made an election to sell (Certificate) all or any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$41,923,146

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	4575 Scotts Valley Apartments LP
Applicant for State Credits:	PSCDC Scotts LLC
Contact:	Paul Salib
Address:	122 East 42nd Street, Suite 1903 New York, CA 10168
Phone:	212-776-1914
Email:	psalib@crpaffrodable.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	California Housing Finance Agency
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser:	Citibank, N.A.

Development Team

General Partner(s) or Principal Owner(s):	PSCDC Scotts LLC CRP 4575 Scotts Valley Apartments AGP LLC WB 4575 Scotts Valley Apartments AGP LLC
General Partner Type:	Joint Venture
Parent Company(ies):	Pacific Southwest Community Development Corporation CRP Affordable Housing and Community Development LLC Workbench
Developer:	CRP Affordable Housing & Community Development LLC
Investor/Consultant:	Redstone Equity Partners
Management Agent:	Cambridge Real Estate Services, Inc.

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	3	
Total # of Units:	100	
No. / % of Low Income Units:	99	100.00%
Average Targeted Affordability:	53.42%	
Federal Set-Aside Elected:	40%/60% Average Income	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (40 Units - 40%)	

Information

Housing Type:	Large Family
Geographic Area:	Central Coast Region
State Ceiling Pool:	Rural
Set Aside:	N/A
CDLAC Project Analyst:	Brandon Medina
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	22	22%
50% AMI:	21	21%
60% AMI:	1	1%
70% AMI*:	55	56%

*CTCAC restricted only

Unit Mix

21	1-Bedroom Units
40	2-Bedroom Units
39	3-Bedroom Units
100	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
1	1 Bedroom	60%	$1,637
10	1 Bedroom	50%	$1,637
10	1 Bedroom	30%	$1,018
25	2 Bedrooms	70%	$2,639
7	2 Bedrooms	50%	$2,037
8	2 Bedrooms	30%	$1,222
30	3 Bedrooms	70%	$3,028
3	3 Bedrooms	50%	$2,354
1	3 Bedrooms	50%	$2,354
4	3 Bedrooms	30%	$1,412
1	3 Bedrooms	Manager Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$9,000,000
Construction Costs	$49,158,390
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,500,000
Soft Cost Contingency	$631,820
Relocation	$0
Architectural/Engineering	$2,000,000
Const. Interest, Perm. Financing	$8,434,673
Legal Fees	$325,000
Reserves	$779,349
Other Costs	$4,552,116
Developer Fee	$9,773,372
Commercial Costs	$0
Total	**$87,154,721**

Residential	
Construction Cost Per Square Foot:	$473
Per Unit Cost:	$871,547
Estimated Hard Per Unit Cost:	$426,419
True Cash Per Unit Cost*:	$813,056
Bond Allocation Per Unit:	$419,231
Bond Allocation Per Restricted Rental Unit:	$952,799

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$41,923,146
Citibank: Taxable	$23,786,118
Deferred Costs	$9,827,721
Tax Credit Equity	$11,617,736

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$34,834,654
Deferred Developer Fee	$5,849,125
Tax Credit Equity	$46,470,942
TOTAL	**$87,154,721**

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

Determination of Credit Amount(s)

Requested Eligible Basis:	$74,929,188
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$97,407,944
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,896,318
Total State Credit:	$16,138,146
Approved Developer Fee (in Project Cost & Eligible Basis):	$9,773,372
Federal Tax Credit Factor:	$0.81992
State Tax Credit Factor:	$0.90000

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 $813,056. The applicant noted that the per unit cost is attributed to a requirement to pay prevailing wages, the escalating cost of building materials, and the special construction type required by this project.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: None.

Standard Conditions
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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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	10
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	120

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: 111.615%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Casa de la Luz, located at 744-754 South Kern Avenue in Unincorporated East Los Angeles on a 0.74 acre site, requested and is being recommended for a reservation of $3,124,556 in annual federal tax credits and $36,749,241 of tax-exempt bond cap to finance the new construction of 95 units of housing, consisting of 93 restricted rental units and 2 unrestricted manager's units. The project will have 20 studio units, 45 one-bedroom units, and 30 two-bedroom units, serving tenants with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in May 2025 and be completed in May 2027. The project will be developed by Hollywood Community Housing Corporation and will be located in Senate District 26 and Assembly District 52.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH) and Affordable Housing and Sustainable Communities (AHSC) programs of HCD.

Project Number CA-24-774

Project Name Casa de la Luz
Site Address: 744-754 South Kern Avenue
Unincorporated East Los Angeles, CA 90022
County: Los Angeles
Census Tract: 5316.04

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$3,124,556	$0
Recommended:	$3,124,556	$0

Tax-Exempt Bond Allocation
Recommended: $36,749,241

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: Casa de la Luz, L.P.
Contact: Sarah Letts
Address: 5020 Santa Monica Boulevard
Los Angeles, CA 90029
Phone: 323-454-6201
Email: sletts@hollywoodhousing.org

Bond Financing Information
CDLAC Applicant/Bond Issuer: Los Angeles County Development Authority
Bond Counsel: Kutak Rock LLP
Private Placement Purchaser: Citi Community Capital

Development Team
General Partner(s) or Principal Owner(s): HCHC Casa de la Luz GP, LLC
General Partner Type: Nonprofit
Parent Company(ies): Hollywood Community Housing Corporation
Developer: Hollywood Community Housing Corporation
Investor/Consultant: California Housing Partnership Corporation
Management Agent: Barker Management, Inc

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	95	
No. / % of Low Income Units:	93	100.00%
Average Targeted Affordability:	46.78%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (40 Units - 43%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	Balance of Los Angeles County
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	40
CDLAC Project Analyst:	Daisy Andrade
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	40	43%
50% AMI:	3	3%
60% AMI:	50	54%

Unit Mix

20	SRO/Studio Units
45	1-Bedroom Units
30	2-Bedroom Units
95	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
20	SRO/Studio	30%	$728
20	1 Bedroom	30%	$780
25	1 Bedroom	60%	$1,560
3	2 Bedrooms	50%	$1,560
25	2 Bedrooms	60%	$1,872
2	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$5,842,830
Construction Costs	$44,823,951
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$2,254,339
Soft Cost Contingency	$312,959
Relocation	$1,000,000
Architectural/Engineering	$2,050,000
Const. Interest, Perm. Financing	$9,805,123
Legal Fees	$220,000
Reserves	$562,319
Other Costs	$2,108,818
Developer Fee	$3,500,000
Commercial Costs	$0
Total	**$72,480,339**

Residential

Construction Cost Per Square Foot:	$545
Per Unit Cost:	$762,951
Estimated Hard Per Unit Cost:	$393,100
True Cash Per Unit Cost*:	$752,425
Bond Allocation Per Unit:	$386,834
Bond Allocation Per Restricted Rental Unit:	$395,153

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$36,749,241
Citibank: Taxable	$22,500,180
LACDA[1]: NPLH	$6,900,000
Deferred Costs	$2,231,270
Deferred Developer Fee	$1,000,000
General Partner Equity	$100
Tax Credit Equity	$3,099,548

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$7,883,000
HCD: AHSC	$27,063,951
LACDA[1]: NPLH	$7,000,000
Deferred Developer Fee	$1,000,000
General Partner Equity	$100
Tax Credit Equity	$29,533,288
TOTAL	**$72,480,339**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Los Angeles County Development Authority

Determination of Credit Amount(s)

Requested Eligible Basis:	$60,087,607
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$78,113,889
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$3,124,556
Approved Developer Fee (in Project Cost & Eligible Basis):	$3,500,000
Federal Tax Credit Factor:	$0.94520

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 $762,951. The applicant noted that the per unit cost is attributed to the use of more expensive materials to maximize density, the construction of a five-story building with subterranean parking, extensive environmental remediation, tenant relocation, increased utility requirements, and rising insurance costs.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 93.655%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Cudahy Seniors, located at 4610 Santa Ana Street in Cudahy on a 1.34 acre site, requested and is being recommended for a reservation of $5,090,331 in annual federal tax credits and $52,300,000 of tax-exempt bond cap to finance the new construction of 140 units of housing, consisting of 138 restricted rental units and 2 unrestricted manager's units. The project will have 129 one-bedroom units, and 11 two-bedroom units, serving special needs tenants with rents affordable to households earning 30%-50% of area median income (AMI). The construction is expected to begin in June 2025 and be completed in June 2027. The project will be developed by National Community Renaissance of California and will be located in Senate District 33 and Assembly District 64.

The project will be receiving rental assistance in the form of HUD Section 8 Project-based Vouchers. The project financing includes state funding from the No Place Like Home (NPLH) and Infill Infrastructure Grant (IIG) programs of HCD.

Project Number CA-24-775

Project Name Cudahy Seniors

Site Address:	4610 Santa Ana Street Cudahy, CA 90201
County:	Los Angeles
Census Tract:	5343.01

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$5,090,331	$0
Recommended:	$5,090,331	$0

Tax-Exempt Bond Allocation

Recommended:	$52,300,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Cudahy Senior Apartments LP
Contact:	Kevin Chin
Address:	9692 Haven Avenue, Suite 100 Rancho Cucamonga, CA 91730
Phone:	909-969-4168
Email:	kchin@nationalcore.og

Bond Financing Information

CDLAC Applicant/Bond Issuer:	Los Angeles County Development Authority
Bond Counsel:	Kutak Rock LLP
Private Placement Purchaser:	Citi Community Capital

Development Team

General Partner(s) or Principal Owner(s):	NCRC CS GP LLC PRIMA CS GP LLC
General Partner Type:	Nonprofit
Parent Company(ies):	National Community Renaissance of California Prima Development
Developer:	National Community Renaissance of California
Investor/Consultant:	Bank of America, N.A.
Management Agent:	National Community Renaissance of California

Project Information

Construction Type:	New Construction	
Total # Residential Buildings:	1	
Total # of Units:	140	
No. / % of Low Income Units:	138	100.00%
Average Targeted Affordability:	33.99%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HOME - American Rescue Plan (ARP) / HUD Section 8 Project-based Vouchers (69 Units - 50%) / Affordable Housing Trust Fund (AHTF)	

Information

Housing Type:	Special Needs
Geographic Area:	Balance of Los Angeles County
State Ceiling Pool:	New Construction
Set Aside:	N/A
Homeless Set Aside Units:	69
CDLAC Project Analyst:	Erin Deblaquiere
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	97	70%
40% AMI:	27	20%
50% AMI:	14	10%

Unit Mix

129	1-Bedroom Units
11	2-Bedroom Units
140	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
68	1 Bedroom	30%	$780
1	1 Bedroom	30%	$780
26	1 Bedroom	30%	$780
24	1 Bedroom	40%	$1,040
10	1 Bedroom	50%	$1,300
2	2 Bedrooms	30%	$936
3	2 Bedrooms	40%	$1,248
4	2 Bedrooms	50%	$1,560
2	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$1,398,865
Construction Costs	$71,399,804
Rehabilitation Costs	$0
Construction Hard Cost Contingency	$3,638,994
Soft Cost Contingency	$100,000
Relocation	$0
Architectural/Engineering	$2,224,032
Const. Interest, Perm. Financing	$6,641,278
Legal Fees	$250,000
Reserves	$785,000
Other Costs	$3,879,454
Developer Fee	$11,418,396
Commercial Costs	$0
Total	**$101,735,823**

Residential

Construction Cost Per Square Foot:	$886
Per Unit Cost:	$726,684
Estimated Hard Per Unit Cost:	$437,196
True Cash Per Unit Cost*:	$708,827
Bond Allocation Per Unit:	$373,571
Bond Allocation Per Restricted Rental Unit:	$378,986

Construction Financing

Source	Amount
Citibank: Tax-Exempt	$52,300,000
LACDA[1]: HOME-ARP	$3,000,000
HCD: IIG	$6,700,000
LACDA[1]: AHTF	$5,000,000
LACDA[1]: NPLH	$3,240,000
LACDA[1]: 4th DCP[2]	$10,000,000
City of Cudahy	$1,500,000
FHLB: AHP[3]	$1,000,000
Deferred Costs	$1,222,000
Deferred Developer Fee	$2,500,000
General Partner Equity	$8,918,396
Tax Credit Equity	$6,355,427

Permanent Financing

Source	Amount
Citibank: Tax-Exempt	$13,161,000
LACDA[1]: HOME-ARP	$3,000,000
HCD: IIG	$6,700,000
LACDA[1]: AHTF	$5,000,000
LACDA[1]: NPLH	$3,240,000
LACDA[1]: 4th DCP[2]	$10,000,000
City of Cudahy	$1,500,000
FHLB: AHP[3]	$1,000,000
Deferred Developer Fee	$1,367,314
General Partner Equity	$8,918,396
Tax Credit Equity	$47,849,113
TOTAL	**$101,735,823**

*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee
[1]Los Angeles County Development Authority
[2]District Community Program
[3]Federal Home Loan Bank of San Francisco: Affordable Housing Program

Determination of Credit Amount(s)

Requested Eligible Basis:	$97,918,643
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	$127,294,235
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	$5,090,331
Approved Developer Fee (in Project Cost & Eligible Basis):	$11,418,396
Federal Tax Credit Factor:	$0.94000

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 $708,827. The applicant noted the cost per unit is due to increased costs related to construction, and prevailing wage requirements. Addtionally, the applicant noted the projects unique site conditions that require a health protective mitigation plan to address liquefaction and soil vapor issues.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event: 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).

Point Criteria	**New Const. Max. Points**	**Rehabilitation Max. Points**	**Points Scored**
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
Total Points	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: 116.792%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

San Joaquin Senior, San Joaquin Apartments and California Apartments, located at 21900, 22150 and 22200 West California Avenue in San Joaquin on a 8.17 acre site, requested and is being recommended for a reservation of $727,456 in annual federal tax credits and $2,043,644 in total state tax credits and $10,000,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 100 units of housing, consisting of 99 restricted rental units and 1 unrestricted manager's unit. The project has 27 one-bedroom units, 40 two-bedroom units, 25 three-bedroom units, and 8 four-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in March 2025 and be completed in December 2025. The project will be developed by Community Preservation Partners and is located in Senate District 14 and Assembly District 27.

San Joaquin Senior, San Joaquin Apartments and California Apartments is a re-syndication of three existing Low Income Housing Tax Credit (LIHTC) projects: San Joaquin Senior Apartments (CA-90-111), San Joaquin Apartments (CA-90-112), and California Apartments (CA-93-003). See Resyndication and Resyndication Transfer Event below for additional information. The project will be receiving rental assistance in the form of USDA RHS 521 Rental Assistance.

Project Number	CA-24-785
Project Name	San Joaquin Senior, San Joaquin Apartments and California Apartments
Site Address:	21900, 22150 and 22200 West California Avenue San Joaquin, CA 93660
County:	Fresno
Census Tract:	82.00

Tax Credit Amounts	**Federal/Annual**	**State/Total** *
Requested:	$727,456	$2,043,644
Recommended:	$727,456	$2,043,644

* The applicant made an election not to sell (Certificate) any portion of the state credits.

Tax-Exempt Bond Allocation

Recommended:	$10,000,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	SJ3 Investment Group, LP
Contact:	Edward Mackay
Address:	531 Mill Road Auburn, CA 95603
Phone:	530.888.7097
Email:	beneficialhousing@gmail.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Public Sale:	Credit Enhanced
Underwriter:	Stifel, Nicolaus & Company
Credit Enhancement Provider:	Moody’s Investors Service

Development Team

General Partner(s) or Principal Owner(s):	Edward Mackay Enterprises, LLC
	The Beneficial Housing Foundation
General Partner Type:	Joint Venture
Parent Company(ies):	SJ3 Investment Group, LLC
	WNC & Associates, Inc.
Developer:	Community Preservation Partners
Investor/Consultant:	WNC
Management Agent:	AWI Management Corporation

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	23	
Total # of Units:	100	
No. / % of Low Income Units:	99	100.00%
Average Targeted Affordability:	53.93%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / USDA RHS 521 (97 Units - 98%) / USDA RD 515	

Information

Housing Type:	Large Family
Geographic Area:	Central Valley Region
State Ceiling Pool:	Other Rehabilitation
Set Aside:	N/A
CDLAC Project Analyst:	Anthony Wey
CTCAC Project Analyst:	Chris Saenz

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	20	20%
60% AMI:	79	80%

Unit Mix

27	1-Bedroom Units
40	2-Bedroom Units
25	3-Bedroom Units
8	4-Bedroom Units
100	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
4	1 Bedroom	30%	$495
15	1 Bedroom	60%	$990
1	2 Bedrooms	60%	$1,158
1	1 Bedroom	30%	$495
3	1 Bedroom	60%	$990
4	2 Bedrooms	30%	$594
14	2 Bedrooms	60%	$1,158
2	3 Bedrooms	30%	$685
10	3 Bedrooms	60%	$1,371
1	4 Bedrooms	30%	$765
2	4 Bedrooms	60%	$1,530
1	4 Bedrooms	60%	$1,530
1	1 Bedroom	30%	$495
3	1 Bedroom	60%	$990
3	2 Bedrooms	30%	$594
18	2 Bedrooms	60%	$1,158
3	3 Bedrooms	30%	$685
9	3 Bedrooms	60%	$1,371
1	4 Bedrooms	30%	$765
3	4 Bedrooms	60%	$1,530
1	3 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application	
Land and Acquisition	$3,316,411
Construction Costs	$0
Rehabilitation Costs	$9,300,000
Construction Hard Cost Contingency	$928,000
Soft Cost Contingency	$150,000
Relocation	$450,000
Architectural/Engineering	$407,000
Const. Interest, Perm. Financing	$3,048,102
Legal Fees	$150,000
Reserves	$804,000
Other Costs	$901,608
Developer Fee	$2,167,910
Commercial Costs	$0
Total	**$21,623,031**

Residential

Construction Cost Per Square Foot:	$108
Per Unit Cost:	$216,230
Estimated Hard Per Unit Cost:	$80,000
True Cash Per Unit Cost*:	$212,521
Bond Allocation Per Unit:	$100,000
Bond Allocation Per Restricted Rental Unit:	$101,010

Construction Financing

Source	Amount
Bonneville: Tax-Exempt	$10,000,000
USDA RD 515 Assumption	$3,266,411
Acquired Reserves	$1,080,361
Net Operating Income	$206,890
Deferred Developer Fee	$1,517,537
Tax Credit Equity	$5,551,833

Permanent Financing

Source	Amount
Bonneville: Tax-Exempt	$8,939,000
USDA RD 515 Assumption	$3,266,411
Acquired Reserves	$1,080,361
Net Operating Income	$206,890
Deferred Developer Fee	$370,951
Tax Credit Equity	$7,759,418
TOTAL	**$21,623,031**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$15,720,348
130% High Cost Adjustment:	No
Requested Eligible Basis (Acquisition):	$2,466,042
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$15,720,348
Qualified Basis (Acquisition):	$2,466,042
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$628,814
Maximum Annual Federal Credit, Acquisition:	$98,642
Total Maximum Annual Federal Credit:	$727,456
Total State Credit:	$2,043,644
Approved Developer Fee (in Project Cost & Eligible Basis):	$2,167,910
Federal Tax Credit Factor:	$0.87000
State Tax Credit Factor:	$0.70000

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

This project has senior housing in combination with non-senior housing. The applicant has provided a third-party legal opinion stating that the project complies with fair housing law, per CTCAC Regulation Section 10322(h)(34).

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event
Prior to closing, the applicant or its assignee shall obtain CTCAC's consent to assign and assume the existing Regulatory Agreements: CA-90-111, CA-93-003, and CA-90-112. To be eligible for a new award of tax credits, the owner must provide documentation with the Form 8609 request (the placed in service submission) that the acquisition date and the placed in service date both occurred after the existing federal 15 year compliance period was completed. For resyndications that were originally rehabilitation and acquisition, the resyndication acquisition date cannot occur before the last rehabilitation credit year of the original credit period.

As required by the IRS, the newly resyndicated project will continue to use the originally assigned Building Identification Numbers (BINs).

The newly resyndicated project shall continue to meet the rents and income targeting levels in the existing regulatory agreements and any deeper targeting levels in the new regulatory agreements for the duration of the new regulatory agreements. Existing households determined to be income-qualified for purposes of IRC §42 credit during the 15-year compliance period are concurrently income-qualified households for purposes of the extended use agreement. As a result, any household determined to be income qualified at the time of move-in under the existing regulatory agreements (CA-90-111, CA-93-003, and CA-90-112) is a qualified low-income household for the subsequent allocation (existing household eligibility is “grandfathered”).

The project is a resyndication where the existing regulatory agreements require service amenities. The project shall provide a similar or greater level of services for a period of at least 15 years under the new regulatory agreement. The project is deemed to have met this requirement based on CTCAC staff’s review of the commitment in the application. The services documented in the placed in service package will be reviewed by CTCAC staff for compliance with this requirement at the time of the placed in service submission.

The project is a re-syndication occurring concurrently with a Transfer Event without distribution of Net Project Equity, and thus is waived from setting aside a Short Term Work Capitalized Replacement Reserve that is otherwise required.

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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 221.970%

CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Qualified Private Activity Tax-Exempt Bond Project
December 11, 2024

Lake Isabella Senior Apartments I & II, located at 2701 Eskine Creek Road in Lake Isabella on a 2.95 acre site, requested and is being recommended for a reservation of $716,565 in annual federal tax credits and $7,750,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 86 units of housing, consisting of 85 restricted rental units and 1 unrestricted manager's unit. The project has 84 one-bedroom units, and 2 two-bedroom units, serving seniors with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in March 2025 and be completed in December 2025. The project will be developed by Community Preservation Partners and is located in Senate District 12 and Assembly District 32.

Lake Isabella Senior Apartments I & II is a re-syndication of two existing Low Income Housing Tax Credit (LIHTC) projects, Lake Isabella Senior Apartments (CA-1990-109) and Lake Isabella Senior II Apartments (CA-1994-093). See Resyndication and Resyndication Transfer Event below for additional information. The project will be receiving rental assistance in the form of USDA RHS 521 Rental Assistance.

Project Number CA-24-787

Project Name Lake Isabella Senior Apartments I & II
Site Address: 2701 Eskine Creek Road
Lake Isabella, CA 93240
County: Kern
Census Tract: 52.05

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$716,565	$0
Recommended:	$716,565	$0

Tax-Exempt Bond Allocation
Recommended: $7,750,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Lake Isabella Investment Group, LP
Contact:	Edward Mackay
Address:	531 Mill Road Auburn, CA 95603
Phone:	530.888.7097
Email:	beneficialhousing@gmail.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Orrick, Herrington & Sutcliffe LLP
Public Sale:	Credit Enhanced
Underwriter:	Stifel, Nicolaus & Company, Incorporated
Credit Enhancement Provider:	Bonneville Mortgage Company

Development Team

General Partner(s) or Principal Owner(s):	Edward Mackay Enterprises, LLC The Beneficial Housing Foundation
General Partner Type:	Joint Venture
Parent Company(ies):	Edward Mackay Enterprises, LLC The Beneficial Housing Foundation
Developer:	Community Preservation Partners
Investor/Consultant:	WNC
Management Agent:	AWI Management Corporation

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	22	
Total # of Units:	86	
No. / % of Low Income Units:	85	100.00%
Average Targeted Affordability:	53.60%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / USDA Section 515	

Information

Housing Type:	Seniors
Geographic Area:	Central Valley Region
State Ceiling Pool:	Other Rehabilitation
Set Aside:	N/A
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	17	20%
60% AMI:	68	80%

Unit Mix

84	1-Bedroom Units
2	2-Bedroom Units
86	Total Units

Unit Type & Number		2024 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
9	1 Bedroom	30%	$495
36	1 Bedroom	60%	$990
8	1 Bedroom	30%	$495
31	1 Bedroom	60%	$990
1	2 Bedrooms	60%	$1,184
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$3,155,217
Construction Costs	$0
Rehabilitation Costs	$6,546,170
Construction Hard Cost Contingency	$650,117
Soft Cost Contingency	$150,000
Relocation	$358,000
Architectural/Engineering	$339,500
Const. Interest, Perm. Financing	$1,975,054
Legal Fees	$150,000
Reserves	$602,400
Other Costs	$789,702
Developer Fee	$1,631,622
Commercial Costs	$0
Total	**$16,347,782**

Residential

Construction Cost Per Square Foot:	$114
Per Unit Cost:	$190,090
Estimated Hard Per Unit Cost:	$65,407
True Cash Per Unit Cost*:	$188,670
Bond Allocation Per Unit:	$90,116
Bond Allocation Per Restricted Rental Unit:	$91,176

Construction Financing

Source	Amount
Bonneville: Tax-Exempt	$7,750,000
USDA RD 515	$3,105,217
Existing Reserves	$544,499
Net Operating Income	$183,773
Deferred Developer Fee	$1,292,135
Tax Credit Equity	$3,472,158

Permanent Financing

Source	Amount
Bonneville: Tax-Exempt	$6,158,000
USDA RD 515	$3,105,217
Existing Reserves	$544,499
Net Operating Income	$183,773
Deferred Developer Fee	$122,177
Tax Credit Equity	$6,234,116
TOTAL	**$16,347,782**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$11,360,998
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$3,144,820
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$14,769,297
Qualified Basis (Acquisition):	$3,144,820
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$590,772
Maximum Annual Federal Credit, Acquisition:	$125,793
Total Maximum Annual Federal Credit:	$716,565
Approved Developer Fee (in Project Cost & Eligible Basis):	$1,631,622
Federal Tax Credit Factor:	$0.87000

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: None.

CDLAC Analyst Comments: None.

Resyndication and Resyndication Transfer Event
As required by the IRS, the newly resyndicated project will continue to use the originally assigned Building Identification Numbers (BINs).

The newly resyndicated project shall continue to meet the rents and income targeting levels in the existing regulatory agreement and any deeper targeting levels in the new regulatory agreement for the duration of the new regulatory agreement. Existing households determined to be income-qualified for purposes of IRC §42 credit during the 15-year compliance period are concurrently income-qualified households for purposes of the extended use agreement. As a result, any household determined to be income qualified at the time of move-in under the existing regulatory agreements (CA-1990-109) and (CA-1994-93) is a qualified low-income household for the subsequent allocation (existing household eligibility is "grandfathered").

The project is a re-syndication occurring concurrently with a Transfer Event without distribution of Net Project Equity, and thus is waived from setting aside a Short Term Work Capitalized Replacement Reserve that is otherwise required.

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.

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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.

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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).

Point Criteria	New Const. Max. Points	Rehabilitation Max. Points	Points Scored
Preservation and Other Rehabilitation Project Priorities	0	20	20
New Construction Density and Local Incentives	10	0	0
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	0
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	0
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
Total Points	120	110	110

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: 176.872%

AGENDA ITEM 5

Resolution No. 24/25-02 to adopt a regular rulemaking for new Regulation 10336 and amendments to the existing federal and state LIHTC programs regulations (Cal. Code of Regs., tit. 4, § 10300 et seq.). (Health and Saf. Code, § 50199.17.)

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
RESOLUTION NO. 24/25-02
December 11, 2024

ADOPTION OF A REGULAR RULEMAKING FOR NEW REGULATION 10336 AND AMENDMENTS TO THE EXISTING FEDERAL AND STATE LOW-INCOME HOUSING TAX CREDIT PROGRAMS REGULATIONS

WHEREAS, the California Tax Credit Allocation Committee ("CTCAC") is responsible for administering the Federal and State Low Income Housing Tax Credit ("LIHTC") programs in California (Health & Saf. Code, § 50199.4 et seq.); and

WHEREAS, CTCAC is authorized to adopt, amend, and repeal regulations for the allocation of low-income housing tax credits (Health and Saf. Code, § 50199.17); and

WHEREAS, CTCAC has identified certain programmatic changes that will provide a more equitable method of allocation and better administration of the tax credit program in California; and

WHEREAS, CTCAC has provided a notice of proposed action to the public at least 21 days before the close of the public comment period and held a public hearing before the close of the public comment period, as required pursuant to Health and Safety Code section 50199.17; and

WHEREAS, regulations take effect immediately upon adoption by CTCAC (Health & Saf. Code, § 50199.17).

NOW, THEREFORE, BE IT RESOLVED by the California Tax Credit Allocation Committee all of the following:

SECTION 1. The regular rulemaking for new California Code of Regulations, title 4, section 10336 and amendments to existing California Code of Regulations, title 4, sections 10300 et seq., as listed in Exhibit A, are adopted and take effect immediately.

SECTION 2: This resolution shall take effect immediately upon its adoption.

Attest: ___________________________
Chair

Date of Adoption: December 11, 2024

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE

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Director of HCD

TIENA JOHNSON HALL
Executive Director of CalHFA

EXECUTIVE DIRECTOR
MARINA WIANT

DATE: December 5, 2024

TO: Low-Income Housing Tax Credit Stakeholders

FROM: Marina Wiant, Executive Director

RE: Final Proposed Regulation Changes and Response to Comments

On September 10, 2024, California Tax Credit Allocation Committee (CTCAC) solicited feedback from stakeholders on the regulations through September 27, 2024. CTCAC staff carefully reviewed and considered the feedback received. On October 30, 2024, the California Tax Credit Allocation Committee ("CTCAC") released proposed regulation changes for a regular rulemaking for the Federal and State Low-Income Housing Tax Credit (LIHTC) programs and opened the 21-day public comment period. CTCAC staff subsequently held an in-person and virtual public hearing in Sacramento on November 12, 2024.

CTCAC accepted written comments on the initial proposed regulation changes through Wednesday, November 20, 2024. Numerous individuals, organizations, and groups formally commented on the proposed regulation changes in both oral and written form. CTCAC staff reviewed all comments received and finalized the recommendations for consideration and adoption to be presented to the Committee on Wednesday, December 11, 2024.

This memo includes the final proposed regulation changes, the initial statement of reasons, a brief summary of the comments received, staff's responses to comments, including explanations to any proposed revisions to the initially proposed changes, and the final proposed changes. CTCAC staff also received comments on regulation changes outside the scope of this regular rulemaking and will consider those comments for a future possible regulation change package. Those additional comments outside the scope of this regular rulemaking are not included in the document.

List of Proposed Regulation Changes, Comments Received,
and Responses to Comments
December 5, 2024

TECHNICAL / MINOR CHANGES

1. **Section 10302(a) through (vvv): Addition of definitions to address accessibility-related concerns and streamline and update definitions to improve the language in other sections of the regulations**

   The proposed changes to the definitions streamline the language, update abbreviations and references to ensure they remain current if statutory language is updated. Other proposed changes improve the reading of the text in other sections by referencing definitions. (Pages 2-10)

   Comments received: One commenter requested to expand the definition in Section 10302(g) to incorporate Health and Safety Code Section 50093.

   One commenter requested that the definition in Section 10302(h) be expanded to include more people because the federal definition does not include people who are at risk of institutionalization in the absence of affordable housing. The commenter explained that people should not have to move into a nursing facility before qualifying if they are otherwise qualified but cannot afford to stay in their home. The commenter requested the definition be expanded to include people who are at risk of institutionalization. The commenter provided an example where individuals with intellectual/developmental disabilities residing with elderly parents who can no longer care for them but who could live independently with support from, among other things, Medi-Cal waiver programs limiting the definition to people with incomes at 30% of AMI. Given the current housing crisis in California, the commenter requests that the requirement be modified to people as high as 50% of AMI but who meet the other requirements of the definition.

   One commenter suggested to clarify Homeless unit in the proposed definition in Section 10302(o)(1). The commenter also recommended removing “immediately” from Section 10302(o)(2) and clarify the intent of the language in Section 10302(o)(3) and align with MHP.

   One commenter stated that the new proposed definition in Section 10302(a)(a) includes references to laws that are generally unknown to architects and proposed removing those references in the proposed definition. The commenter suggested changing references from “Fair Housing Laws” to “Housing and Accessibility Requirements”. One commenter recommended some technical citations changes.

   One commenter requested using “agricultural worker” instead of “farmworker” in Section 10302(b)(b) to be consistent with HCD and “more inclusive and appropriate term.”

Four commenters supported continuing to include individuals transferring from one homeless unit to another in the definition of Homeless in Section 10302(kk). In addition, the commenters recommended that residents of Single Room Occupancy (SRO) units be treated in a comparable manner in Section 10302(kk)(3) as they frequently house individuals who were formerly homeless. In Section 10302(kk)(2), one commenter requested clarification that individuals/family must only meet one of the items listed (e.g., received Supportive Services or rental subsidies administered by a CoC or other program(s) for people experiencing homelessness, including a public housing authority's shelter plus care program or SRO Moderate Rehabilitation Program). One commenter expressed confusion over Sections 10302(kk)(2) and (3) and requested to include “Chronic Homelessness” in the definition of “Homeless”.

One commenter requested additions to the list of laws in the proposed definition in Section 10302(ll).

One commenter requested a list of specific programs exemplifying the types of qualifying supportive services for older adults be incorporated in the proposed definition in Section 10302(yy).

One commenter recommended adding domestic partnerships and relationships formed through marriage, adoption, and guardianship to the list in Section 10302(ddd)(1).

Two commenters supported the proposed change in Section 10302(kkk) as it expands the definition to better align with HCD’s definition and increases consistency among program requirements and populations served. One commenter recommended adding Transitioning Age Youth (TAY) as a population group to Section 10302(kkk). One commenter recommended clarity in Section 10302(kkk)(1) stating it is not clear whether “people with disabilities” is intended to reference the definition of “Disability” provided earlier in this section, in which case the phrasing or capitalization should be changed to clarify.

Five commenters had concerns with the “obtain and maintain housing” language in Section 10302(mmm). Four of the commenters recommended removing the proposed language “necessary to assist people obtain and maintain housing” and maintaining the rest of the definition to align with HCD’s definition. Another commenter suggested replacing the language with “maintain and stabilize” as proposed in Section 10302(kkk). One commenter noted an error to one of the citations referenced.

Response to comments: In response to the comment to the proposed definition in Section 10302(g), Health and Safety Code Section 50093 does not apply to the LIHTC program. The LIHTC program is administered by the Internal Revenue Service (IRS) where the rent and income limits are set by the Department of Housing and Urban Development (HUD) in accordance with IRS revenue rulings.

Staff declines to expand the proposed definition requested in Section 10302(h). Under the CTCAC regulations, people at-risk of homelessness are included as a Special Needs Population, which also includes people with disabilities and people existing in institutional settings or at risk of placement in institutional settings. For purposes of the LIHTC program, there is no apparent substantive benefit to expanding the definition. Additionally, this definition is consistent with the MHP Guidelines.

Staff agrees with the comments to the proposed definition in Section 10302(o)(1)-(3) and the changes have been incorporated in the final proposed change below.

Staff agrees with the comments relating to the proposed definition in Section 10302(aa) and the changes have been incorporated in the final proposed change below. In addition, the references from “Fair Housing Laws” to “Housing and Accessibility Requirements” have been changed throughout the CTCAC regulations.

Staff declines making the change from “farmworker” to “agricultural worker” in Section 10302(b)(b), to remain consistent with state statute.

Staff declines to make the change to treat residents of SRO units the same way as in Section 10302(kk)(3) as those residents are not necessarily individuals who were formerly homeless. The language in Section 10302(kk)(2) is clear that only one of the items listed must be met based on the “or” at the end of the sentence so no additional clarity is necessary. Sections 10302(kk)(1)-(3) is a restatement of CTCAC’s current definition of homelessness being moved from Section 10315 into the proposed section. Regarding Section 10302(kk)(2) the addition of “individuals or families receiving or who will receive or have received Supportive Services through Medi-Cal” will result in an overly broad definition whereby anyone on Medi-Cal who is receiving supportive services qualifies as homeless, regardless of housing status. Housed individuals and families receiving Medi-Cal Supportive Services would qualify under the Special Needs housing type. Regarding Section 10302(kk)(3), the intent of this language is for an individual or family to retain their qualification for a Low-Income Unit despite displacement. Anyone who initially qualified for a Low-Income Unit maintains their right to transfer to another Low-Income Unit despite being stably housed and otherwise qualifying for the program. Nothing prevents this individual or family from qualifying for other units upon displacement. Staff also included “Chronic Homelessness” in the definition of “Homeless,” in Section 10302(kk)(4). Regarding the request to include “Individuals or households At-Risk of Homelessness” to the definition of “Homeless,” CTCAC declines to adopt this recommendation as its current definition is consistent with HCD’s MHP Guidelines. However, also consistent with MHP Guidelines and Section 10336(b)(2)(B)(ii), CTCAC will clarify that Low-Income Unit vacancies may be filled through the local CES with a person at-risk of homelessness.

Staff agrees with some of the requested additions in Section 10302(ll) and incorporated those additions with some edits for brevity and added a catchall at the end for federal and state regulations implementing the laws. The changes are incorporated in the final proposed change below. Staff did not accept the addition of “and 28 C.F.R. parts 35 and 36” because these provisions are already cited in the definition.

Staff declines to include a specific list of supportive services in Section 10302(yyy) at this time, but intends to provide additional guidance to LIHTC owners and property managers about compliance with regulatory requirements for Special Needs Populations.

Staff declines to add Transitioning Age Youth (TAY) as a population group to Section 10302(kkk) at this time as Homeless youth is currently included in Section 10302(kkk)(7). Staff has made the change in Section 10302(kkk)(1) from "disabilities" to "Disabilities" to provide additional clarity. The changes are incorporated in the final proposed changes below.

Staff accepts the comment to remove "obtain and" from the text in Section 10302(mmm) and has corrected the citation noted by the commenter. The changes are incorporated in the final proposed changes below.

All remaining suggestions will be considered for a future rule making.

Final proposed change: Proceed as initially proposed except as noted below

(e) Alternative Accessibility Standards or "HUD Deeming Memo," HUD-2014-0042-001. The Alternative accessibility standard for accessibility in the U.S. Department of Housing and Urban Development's (HUD) notice at 70 Fed. Reg. 29,671 (May 23, 2014,) when used in conjunction with the requirements of 24 Code of Federal Regulations (C.F.R.) part 8 and 28 CFR part 35, including the 2010 Standards for Accessible Design (2010 ADAS) (28 C.F.R. part 35.104), available at https://www.ada.gov/law-and-regs/design-standards/2010-stds/.

(g) Area Median Income or AMI. HUD developed income limits based on median family income estimates and fair market rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan area, published annually on the CTCAC website.

(h) At-Risk of Homelessness. The condition experienced by people defined as "at risk of homelessness" in 24 CFR Section~~parts~~ 91.5 or 578.3.

(m) Certified Access Specialist or CASp. Any individual currently holding a valid certification of certified access specialist pursuant to subchapter 2.5 of title 21 of the California Code of Regulations (C.C.R.).

(o) Chronic Homelessness or Chronically Homeless. The condition experienced by people defined as "chronically homeless" in 24 CFR section~~parts~~ 91.5 or 578.3 and includes individuals and families:

(1) Residing in a place not meant for human habitation, emergency shelter, or safe haven, after experiencing Chronic Homelessness and subsequently residing in a Low-Income Unit~~Homeless unit~~ within the last year;

(2) Residing in transitional housing ~~immediately~~ after experiencing Chronic Homelessness; or

(3) Residing in an existing Low-Income Unit being rehabilitated with financial assistance from a state housing agency or being replaced by a project receiving

financial assistance from a state housing agency provided that, upon occupancy, the individual or family was~~immediately after~~ experiencing Chronic Homelessness.

(x) Disability. Has the same meaning as "disability" in the Americans with Disabilities Act (ADA) at 42 United States Code (U.S.C.) section 12102 or the California Fair Employment and Housing Act (FEHA) at Government Code (Gov. Code) section 12926 and C.C.R.~~alifornia Code of Regulations~~, title 2, section 14020.

(aa) Fair Housing Law(s). Includinge the California ~~Fair Employment and Housing Act (~~FEHA) (Gov. Code, § 12900 et seq.; 2 C.C.R. § 12005 et seq.); the Unruh Civil Rights Act (Unruh Act) (Civ. Code, § 51 et seq.); Gov.~~ernment~~ Code section 11135 and 2 C.C.R. § 14000 et seq. (the prohibition of discrimination in state-funded programs); Gov.~~ernment~~ Code section 8899.50 (the duty to affirmatively further fair housing); California's Housing Element Law (Gov. Code, § 65583 et seq.); ~~California Code of Regulations, title 2, sections 12264 – 12271 (legally permissible consideration of criminal history information in housing);~~ the Disabled Person Act (Civ. Code § 5, et seq.), Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.); the Americans with Disabilities Act of 1990 (ADA) (42 U.S.C. § 12101 et seq.); the Fair Housing Act (FHA) and amendments (42 U.S.C. § 3601 et seq.); the Fair Housing Amendments Act of 1988; Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); the Architectural Barriers Act of 1968 (42 U.S.C. § 4151 et seq.); the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101 – 6107); and all federal and state regulations implementing these laws.

(kk) Homeless or Homelessness. ~~As defined by Section 10315(b)(1) through (4)~~. The condition of individuals or households who meet the definition of "homeless" in HUD regulation, 24 CFR parts 91.5 or 578.3 and includes:

(1) Individuals or families subject to a Continuum of Care (CoC) emergency transfer plan;

(2) Individuals or families receiving or who received Supportive Services or rental subsidies administered by a CoC or other program(s) for people experiencing homelessness, including a public housing authority's shelter plus care program or SRO Moderate Rehabilitation Program; and

(3) Individuals or families of a development undergoing rehabilitation with Tax Credits, or being replaced by a Tax Credit-funded property, shall be deemed to qualify under this definition if they qualified upon initial occupancy~~who are otherwise transferring to a Homeless unit from a Homeless unit~~.

(4) Individuals defined as Chronically Homeless herein.

(5) People at-risk of homelessness referred to fill a Low-Income Unit vacancy through a local CES consistent with Section 10336(b)(2)(B)(ii).

(ll) Housing and Accessibility Requirements. Include California Building Code (CBC) Chapters 11 A and B; the Fair Housing Act (FHA) (42 U.S.C. § 3601 et seq.;~~) and its implementing regulations at~~ 24 C.F.R.~~ode of Federal Regulations~~ part 100)~~,; and~~ the ANSI A117.11986 design and construction standard incorporated by reference at 24 CFR~~ode of Federal Regulations~~ part 100.201a; the ADA (42 U.S.C. § 12101 et seq.;~~) and its implementing regulations at~~ 28 C.F.R.~~ode of Federal Regulations~~ part 35 (Title 11) and part 36 (Title III))~~; Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) and its implementing regulations at 24 Code of Federal Regulations part 8; and~~ the Uniform Federal Accessibility Standards (UFAS) at 24 C.F.R.~~ode of Federal Regulations part~~ 40, or, in the alternative, the Alternative Accessibility Standards (as defined in (e)) when used with the 2010 ADAS and CBC 11 B; the Department of Agriculture Regulations for Rural Housing Programs (7 CFR 15b); and all federal and state regulations implementing these laws.

(kkk) Special Needs Population(s). One or more of the following groups who need Supportive Services to maintain and stabilize their housing:

(1) People with ~~d~~Disabilities;

(2) At-Risk of Homelessness;

(3) Individuals with substance use disorders;

(4) Frequent users of public health or mental health services, as identified by a public health or mental health agency;

(5) Individuals who are fleeing domestic violence, sexual assault, and human trafficking;

(6) Individuals who are experiencing Homelessness or Chronic Homelessness;

(7) Homeless youth as defined in Government Code section 12957, subdivision (e)(2);

(8) Families meeting the definition of "Eligible family" under the Bringing Families Home program at WIC section 16523, who may or may not be participating in the program.

(9) Individuals exiting institutional settings or at risk of placement in an institutional setting;

(10) Older Adults in Need of Supportive Services; or

(11) Other specific groups with unique housing needs as determined by the Executive Director.

(mmm) Supportive Services. Services that address the special needs of people served by a project necessary to assist people obtain and maintain housing. Such services shall be consistent with the definition of "Supportive Services" in subdivision ~~(a)~~(29) of section 11360 of title 42 of the United States Code, and may include social, health, educational, income support and employment services and benefits, coordination of community building and educational activities, individualized needs assessment, and individualized assistance with obtaining services and benefits.

2. **Section 10315(a) and (b): Changes to the Nonprofit set-aside**

The proposed changes references definitions being proposed in #1 above. (Page 12-14)

Comments received: None

Final proposed change: Proceed as initially proposed

3. **Section 10315(e): Special Needs set-aside**

The proposed change is a conforming change and references a definition proposed in #1 above. (Page 15)

Comments received: None

Final proposed change: Proceed as initially proposed

4. **10315(h): Large Family Highest/High Resource Areas housing type goal**

   The proposed change cross-references the (first) tie breaker in Section 10325(c)(9). (Page 15-16)

   Comments received: None

   Final proposed change: Proceed as initially proposed

5. **Section 10317(c), (d), (g), (h), and (j): State tax credits**

   The proposed changes add numbering to hanging paragraphs. (Page 17-21)

   Comments received: None

   Final proposed change: Proceed as initially proposed

6. **Section 10320(b)(1)(D) and (E): Rent increase limit reference**

   The proposed change cross-references the rent increase limit moved to a newly proposed Section 10336(a). (Page 22)

   Comments received: None

   Final proposed change: Proceed as initially proposed

7. **Section 10320(b)(2)(B)(iii), (b)(2)(C), (4)(A)-(F), and (5): Transfer event**

   The proposed change adds numbering to hanging paragraphs and updates abbreviations. (Page 23-24)

   Comments received: None

   Final proposed change: Proceed as initially proposed

8. **Section 10322(f): Application changes**

   The proposed change clarifies the only cases where application changes are allowed. (Page 26)

Comments received: None

Final proposed change: Proceed as initially proposed

9. Section 10322(h)(1): Applicant statement

The proposed change clarifies the laws an applicant is agreeing to comply with. (Page 26-27)

Comments received: One commenter suggested referencing Fair Housing and Non-Discrimination Laws and Housing and Accessibility Requirements in subdivision (F).

Response to comments: Staff accepted the comment and included the change in the final proposed change below. In addition, staff made a change in subdivision (G) in response to a comment received on Section 10325(c)(2)(W) disclosing any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of fair housing or anti-discrimination laws and the status of the proceeding, as applicable.

Final proposed change:

(1) Applicant's Statement. A completed and signed version of the CTCAC Applicant Statement signifying the responsibility of the applicant to:

(A) provide application related documentation to the Committee upon request;

(B) be familiar with and comply with Credit program statutes and regulations;

(C) hold the Committee and its employees harmless from program-related matters;

(D) acknowledge the potential for program modifications resulting from statutory or regulatory actions;

(E) acknowledge that Credit amounts reserved or allocated may be reduced in some cases when the terms and amounts of project sources and uses of funds are modified

~~a.~~

~~(E)~~(F) agree to comply with local, state, and federal laws, constitutions, codes, standards, rules, guidelines, and regulations, including, without limitation, those that pertain to accessibility, construction, health and safety, labor, fair housing, fair employment practices, affirmatively furthering fair housing, nondiscrimination, and equal opportunity, including the Fair Housing and Non-Discrimination Laws and Housing and Accessibility Requirements ~~laws outlawing discrimination~~;

~~(F)~~(G) disclose any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of fair housing or anti-discrimination laws and the status of the proceeding, as applicable;

~~(G)~~(H) acknowledge that the Committee has recommended the applicant seek tax advice;

~~(H)~~(I) acknowledge that the application will be evaluated according to Committee regulations, and that Credit is not an entitlement;

~~(I)~~(J) acknowledge that continued compliance with program requirements is the responsibility of the applicant;

~~(J)~~(K) acknowledge that information submitted to the Committee is subject to the Public Records Act;

~~(K)~~(L) agree to enter with the Committee into a regulatory contract if Credit is allocated; and,

~~(L)~~(M) acknowledge, under penalty of perjury, that all information provided to the Committee is true and correct, and that applicant has an affirmative duty to notify the Committee of changes causing information in the application or other submittals to become false.

10. Section 10322(h)(5): Identification of project participants

The proposed change adds Supportive Services provider as project participant who needs to be identified. (Page 28)

Comments received: Two commenters requested to change "provider" to "coordinator" to clarify the supportive services coordinator is separate and distinct from the housing provider. Unlike a service provider, one commenter explained that a coordinator does not deliver services directly. Instead, their primary role is to connect tenants with supportive services.

Response to comments: Staff accepted the comment and included the change in the final proposed change below.

Final proposed change:

(5) Identification of project participants. For purposes of this Section all of the following project participants, if applicable will be considered to be members of the Development Team. The application must contain the company name and contact person, address, telephone number, and fax number of each:

(A) developer;

(B) general contractor;

(C) architect;

(D) attorney

(E) tax professional;

~~(E)~~(F) Supportive Services ~~provider~~coordinator, if applicable;

~~(F)~~(G) property management company;

~~(G)~~(H) consultant;

~~(H)~~(I) market analyst and/or appraiser; and

~~(I)~~(J) CNA consultant.

If any members of the Development Team have not yet been selected at the application filing deadline, each must be named and materials required above must be submitted at the 180 or 194 day deadline described in Section 10325(c)(7).

11. Section 10322(h)(10): Appraisals

The proposed change improves the reading of the text. (Page 30)

Comments received: None

Final proposed change: Proceed as initially proposed

12. Section 10322(h)(12): Architectural Drawings

The proposed changes clarify that the architect certification is specific to the design of the development and references a definition proposed in #1 above and updates an abbreviation. (Page 31)

Comments received: One commenter recommended changing the reference from Fair Housing Laws to the new Housing and Accessibility Requirements because the latter reflects the relevant architectural accessibility requirements.

Response to comments: Staff agrees with the changes regarding the reference to the new Housing and Accessibility Requirements and has made the change in the final proposed change below.

Final proposed change:

(12) Architectural drawings. Preliminary drawings of the proposed project, including a site plan, building elevations, and unit floor plans (including square footage of each unit). The project architect shall certify that the design of the development will comply with building codes and the physical building requirements of all applicable Housing and Accessibility Requirements~~fFair hHousing lLaws~~. In the case of rehabilitation projects proceeding without an architect, the entity performing the CNA~~apital Needs Assessment~~ shall note necessary fair housing improvements, and the applicant shall budget for and implement the related construction work. The site plan shall identify all areas or features proposed as project amenities, laundry facilities, recreation facilities and community space. Drawings shall be to a scale that clearly shows all requested information. Blueprints need not be submitted. A project applying as a High-Rise Project must include the project architect certification in accordance with the High-Rise Project definition in Section 10302.

13. Section 10322(h)(10) and (35)

The proposed changes update abbreviations. (Page 35)

Comments received: None

Final proposed change: Proceed as initially proposed

14. Section 10322(h)(34)

The proposed change references a definition proposed in #1 above. (Page 35)

Comments received: None

Final proposed change: Proceed as initially proposed

15. Section 10322(i)(8) and (13)-(22): Placed-in-Service application documents

The proposed changes reference definitions proposed in #1 above, corrects capitalizations, consolidates documentation for Compliance and Verification requirements and clarifies that the architect certification is specific to the design of the development as opposed to the physical development. (Page 36-38)

Comments received: One commenter recommended striking "and Fair Housing Laws" in subdivision (15) because the definition of Fair Housing Laws includes references to laws that are generally unknown to architects. As such, architects should not be asked to certify laws that we have no knowledge or professional purview over.

Response to comments: Staff agrees with the comment and will remove the "and Fair Housing Laws" from the text as shown in the final proposed change below.

Final proposed change: Proceed as initially proposed except as noted below

~~(16)~~ (15) a certification from the project architect or, in the case of rehabilitation projects, from an architect retained for the purpose of this certification, that the ~~physical buildings~~design of the development ~~are~~is in compliance with all applicable Housing and Accessibility Requirements~~ and Fair Housing Laws~~~~fair housing laws~~;

16. Section 10322(k)

The proposed change corrects a typo. (Page 38)

Comments received: None

Final proposed change: Proceed as initially proposed

17. Section 10325(a): 9% Applications

The proposed change removes the uncertainty of pending applications applying for 9% credits by establishing a deadline for which any project applying for 9% applications with a pending tax-exempt bond/4% application or previously awarded tax-exempt bonds/4% credits as of the 9% application filing deadline is deemed ineligible for 9% credits. The proposed schedule will allow sufficient time for an applicant to make the decision on whether to withdraw their tax-exempt bond/4% application or return their tax-exempt bond allocation/4% reservation in advance of the 9% application filing deadline if they wish to be eligible to apply for 9% credits. (Page 39)

Comments received: While supportive of the flexibility created by allowing applicants to withdraw their 4% application in advance of the 9% filing deadline, 10 commenters recommended removing the prohibition on concurrent 4% and 9% applications altogether. Six of commenters noted that in the interest of time and reducing costs, developers must pursue all possible funding sources to obtain full financing. With the overlap of 4% and 9% rounds, six of the commenters explained that there are times when a 4% application is still pending when a 9% application is due and it is not adequate to require developers to make a consequential withdrawal decision based on third-party sorts relying solely on self-scores, which are easily subject to change in the CTCAC and CDLAC review processes. Two of the commenters explained that many projects financed today, especially those supported by HCD, are interchangeable as to the type of credits (9% or 4%) they need for financial feasibility and sponsors often require as many chances to secure tax credits as are offered in any given year. One of the commenters asked CTCAC to consider timing the allocation calendar so that applicants have sufficient time to identify whether a project will receive an allocation under one program before applying for the alternative and provide a draft calendar of allocation dates soon so that we have adequate time to prepare our 2025 application pipeline.

One commenter supported the flexibility in allowing developers to make a decision on whether to withdraw their tax-exempt bond/4% tax credit application or return their tax-exempt bond/4% tax credit reservation in advance of the 9% tax credit application filing deadline to be eligible to apply for 9% tax credits.

One commenter suggested providing additional clarity for projects that have received a prior 4% award and have either not accepted such award or have accepted such award and subsequently returned it. The commenter suggested changes in the last sentence of the paragraph to provide that clarity.

Response to comments: Staff understands a project's need to apply for as many resources as possible which includes 4% and 9% credits. Given applications are reviewed based on ranking and in accordance with the CDLAC and CTCAC regulations, it can be challenging to have applications unexpectedly withdraw their 4% application on the preliminary recommendation list knowing that they will likely be successful after the CTCAC publishes the applicant list. In these cases, it can be disruptive to the sorting of the CDLAC applications and could result in significant changes and more application reviews with a very small timeframe to review them. By requiring the applicant to withdraw their 4% application by the 9% application deadline, it will allow staff more time to review any additional applications resulting from the withdrawal.

Staff will consider the application round deadlines and award meetings to allow applicants to make a more informed decision on whether to withdraw their application.

Staff agrees with the commenter regarding additional clarify being provided for projects that have received a prior 4% award and have either not accepted such award or have accepted such award and subsequently returned it. The additional changes have been incorporated in the final proposed change highlighted below.

Final proposed change:

(a) General. All applications not requesting Federal Tax Credits under the requirements of IRC Section 42(h)(4)(b) and Section 10326 of these Regulations (for buildings financed by tax-exempt bonds) shall compete for reservations of Credit Ceiling amounts during designated reservation cycles. Further, ~~no~~ projects that have~~s~~ ~~a~~ pending applications for ~~a~~ private activity bond allocations or that have~~s~~ previously received and accepted ~~a~~ private activity bond allocations that have not been returned as of the application filing deadline ~~will~~are ~~be~~ ineligible to compete under the Credit Ceiling competition for Federal Tax Credits.

18. Section 10325(c)(1)

The proposed change references a definition proposed in #1 above. (Page 42)

Comments received: None

Final proposed change: Proceed as initially proposed

19. Section 10325(c)(2)(V) and (W): Negative Points

The proposed change corrects a capitalization and adds documented violation of the Housing and Accessibility Requirements or Fair Housing Laws to the existing list of items that could warrant the issuance of negative points. (Page 44)

Comments received: One commenter had concerns with the phrase "documented violations" stating it is too vague because it does not specify what kind of documentation suffices. The commenter is unsure how CTCAC will receive information about violations and suggest adopting CDLAC language and require applicants to "disclose any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of fair housing or anti-discrimination laws and the status of the proceeding, as applicable.

Four commenters had concerns about the prospect of negative points for violations that they have not had a chance to address. Three of the commenters specifically noted concerns with violations of the Housing and Accessibility Requirements or Fair

Housing Laws. The commenters recommended opening an opportunity to appeal or cure a violation before assessing negative points.

Response to comments: Staff revised the language in the final proposed change below to clarity what constitutes a "documented violation". In response to the comment regarding how CTCAC will receive this information, staff has made an additional change in Section 10322(h)(1)(G) requiring the applicant to disclose any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of fair housing or anti-discrimination laws and the status of the proceeding, as applicable.

CTCAC currently has an appeal process for negative points in Section 10330(b)(2) providing an owner the opportunity to file an appeal.

Final proposed change: Proceed as initially proposed except as noted below

(W) Final decisions of any local, state, or federal regulatory or investigative body~~documented~~ finding violations of the Housing and Accessibility Requirements or Fair Housing Laws.

20. Section 10325(c)(6)(A) and (B): Lowest Income

The proposed changes update abbreviations and corrects a capitalization. (Page 52-53)

Comments received: None

Final proposed change: Proceed as initially proposed

21. Section 10325(c)(8)(B): Enhanced Accessibility and Visitability

The proposed changes references definitions proposed in #1 above and improves the reading of the text. (Page 54)

Comments received: One commenter recommended removing references to CBC 11A in the second bullet as all tax credit projects are considered publicly funded so only CBC 11B applies. In addition, the commenter stated that CBC 11A is different than 11B so it is impossible to conform to both at the same time.

One commenter stated that CASp involvement referenced in the eight bullet will add significant soft cost to any project, possibly $50,000. As such, the commenter recommended that it be allowable for Architect of Record to certify compliance.

One commenter suggested aligning the language regarding the CASp requirement with Section 10325(f)(7)(M)(iii).

Response to comments: Staff appreciates the comment regarding CBC 11A and the potential increased costs for CASp involvement. Staff has revised the language to remove CBC 11A and allow for either a CASp or an architect with demonstrated experience meeting federal accessibility requirements to certify to compliance with the requirements in subdivision (B).

Staff has aligned the language regarding the CASp requirement with the language in Section 10325(f)(7)(M)(iii) and it is incorporated in the final proposed change below.

Final proposed change:

(B) Enhanced Accessibility and Visitability. Project design incorporates accessibility provisions of the Housing and Building Accessibility Requirements~~California Building Code Chapter 11(B)~~ and the principles of Universal Design in at least half of the project's Low-Income Units, ~~by~~ including:

- Accessible routes of travel to the dwelling units with accessible 34" minimum clear-opening-width entry, and 34" clear width for all doors on an accessible path.
- Interior doors with lever hardware and 42" minimum width hallways. Fully accessible bathrooms complying with ~~California Building Code (~~CBC~~) Chapter 11(A) and~~ 11~~(~~B~~)~~. In addition, a 30"x48" clearance parallel to and centered on the bathroom vanity.
- Accessible kitchens with 30"x48" clearance parallel to and centered on the front of all major appliances and fixtures (refrigerator, oven, dishwasher and sink)
- Accessible ~~master~~primary bedroom size shall be at least 120 square feet (excluding the closet), shall accommodate a queen size bed, shall provide 36" in clearance around three sides of the bed, and shall provide required accessible clearances, free of all furnishings, at bedroom and closet doors. The ~~master~~primary bedroom closet shall be on an accessible path.
- Wiring for audio and visual doorbells required by UFAS shall be installed.
- Closets and balconies shall be located on an accessible route.
- These units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project consistent with 24 CFR ~~part~~Section 8.26.
- Applicant must commit to obtaining certification from a CASp or architect with demonstrated experience meeting federal ~~certification as to all~~ accessibility requirements~~confirmation from a Certified Accessibility Specialist that the above requirements have been met~~. 2 points

22. Section 10325(c)(8)(E)

The proposed change updates an abbreviation. (Page 54)

Comments received: None

Final proposed change: Proceed as initially proposed

23. Section 10325(c)(9)(A)

The proposed change improves the reading of the text. (Page 58)

Comments received: None

Final proposed change: Proceed as initially proposed

24. Section 10325(d)(1)

The proposed change improves the reading of the text and updates an abbreviation (Page 61 and 63)

Comments received: None

Final proposed change: Proceed as initially proposed

25. 10325(f): Basic thresholds

The proposed change clarifies that no application is complete if the basic threshold requirements in Section 10325(f) are not met at the time the application is filed. (Page 66)

Comments received: None

Final proposed change: Proceed as initially proposed

26. 10325(f)(1): Housing need and demand

The proposed change improves the reading of the text. (Page 66)

Comments received: None

Final proposed change: Proceed as initially proposed

27. Section 10325(f)(7)(E): Appliances

The proposed change improves the reading of the text. (Page 70)

Comments received: One commenter recommended "range" be removed from the appliances as there is no ENERGY STAR rated electric range.

Response to comments: The language in the section states, "As applicable, appliances provided or replaced within Low-Income Units and/or in on-site community facilities shall be ENERGY STAR rated, unless waived by the Executive Director." If there are no ENERGY STAR rated electric ranges, then it would not be applicable.

Final proposed change: Proceed as initially proposed

28. Section 10325(f)(7)(H)

The proposed change updates an abbreviation (Page 70)

Comments received: None

Final proposed change: Proceed as initially proposed

29. Section 10325(f)(7)(J): On-site manager's unit

The proposed changes add numbering to hanging paragraphs and improves the reading of the text by referencing the CTCAC Compliance Manual. (Page 70-71)

Comments received: One commenter supported the proposed changes. The commenter explained that requiring a full-time on-site manager for smaller buildings is economically burdensome when necessary management can be provided in other ways, which can be done in compliance with local, state and federal laws.

Response to comments: Staff corrected a typo in subdivision (iii) and rephrased the language in subdivision (iv) to not require a waiver, but rather allow equivalent management services after upon approval by and at the discretion of the Executive Director.

Final proposed change:

(J) On-Site Manager's Unit.

~~(J)~~ (i) An on-site manager's unit is required for~~Consistent with California State law,~~ projects with 16 or more Low-Income and Market-Rate Units ~~must have an on-site manager's unit~~. Projects with at least 161 Low-Income and Market-Rate Units shall provide a second on-site manager's unit for either another on-site manager or other maintenance personnel, and there shall be one additional on-site manager's unit for either another on-site manager or other maintenance personnel for each 80 Low-Income and Market-Rate Units beyond 161 units, up to a maximum of four on-site manager's units.

(ii) Scattered site projects totaling 16 or more Low-Income and Market-Rate Units must have at least one on-site manager's unit for the entire project, and at least one manager's unit at each site where that site's building(s) consist of 16 or more Low-Income and Market-Rate Units. Scattered sites within 100 yards of each other shall be treated as a single site for purposes of this paragraph~~e on-site manager rule only~~.

(iii) If an applicant or project owner proposes using~~to utilize~~ a ~~l~~Low-~~i~~Income ~~u~~Unit to meet the requirements of ~~of~~ subdivision (f)(7)(J), the owner must comply with the~~California and CTCAC~~ Resident Manager's Unit requirement set forth in CTCAC's Compliance Manual, available on CTCAC's website (https://www.treasurer.ca.gov/ctcac/compliance/manual.asp) and incorporated herein by reference~~manager unit requirements, the following applies: (1) the unit is considered a low-income restricted unit and must comply with all requirements associated with low-income~~

~~restricted units; (2) the unit is included in the applicable fraction; and (3) the tenant cannot be evicted upon employment termination. If employment is terminated, the project owner is responsible for continuing to meet California and CTCAC onsite manager unit requirements. Any application proposing to utilize a low-income unit to meet California and CTCAC manager unit requirements must include a description in the application of how the project will meet those requirements if employment is terminated~~.

(iv) At ~~T~~the Executive Director's discretion and upon approval by the Executive Director, in lieu of providing an on-site manager, a project may meet ~~may waive~~ the on-site manager unit requirements of subdivision (f)(7)(J)(i)-(ii) ~~if the Executive Director finds the project otherwise~~ by providing~~es~~ tenants with equivalent access to management services. For example~~In lieu of on-site manager units~~, a project may commit to employ an equivalent number of on-site full-time property management staff (at least one of whom is a property manager) and provide an equivalent number of desk or security staff who are not tenants and are capable of responding to emergencies for the hours when property management staff is not working. All staff or contractors performing desk or security work shall be knowledgeable of how the property's fire system operates and be trained in, and have participated in, fire evacuation drills for tenants. CTCAC reserves the right to require that one or more on-site managers' units be provided and occupied by property management staff if, in its sole discretion, it determines as part of any on-site inspection that the project has not been adequately operated and/or maintained. Nothing herein~~Any waiver granted under this subdivision does not~~ relieves the applicant from complying with any other local, state, or federal laws regarding on-site manager units.

30. Section 10325(f)(7)(K) and (L): Accessible housing unit(s) and waivers

The proposed changes add numbering to hanging paragraphs, update abbreviations, reference definitions proposed in #1 above and improve the reading of the text. The proposed changes in subdivisions 10325(f)(7)(K)(ii) and (iii) provide additional clarification to the requirements of Accessible Housing Units. (Page 71-72)

Comments received: One commenter recommended revising the first sentence to say: "All projects shall comply with the Housing and Building Accessibility Requirements in addition to the following..." to ensure applicants understand that all projects must provide some level of accessibility.

Two commenters suggested that rather than requiring that a certain percentage of units be "dedicated" as housing units with Mobility and Hearing/Vision Features in Section 10325(f)(7)(K)(i), the commenters requested that the requirement be that a percentage of these units be "made available" with these features upon request to retain the flexibility needed to meet the future resident's actual needs. The commenters added that many family projects do not even use all the accessible units required to be delivered and are frequently occupied by households that do not need accessibility features. One commenter suggested that CTCAC explain somewhere in this subsection that if a project chooses to combine Mobility Features and

Hearing/Vision Features in one unit, that unit cannot be double-counted as both a Mobility Unit and Hearing/Vision Unit to ensure that combining features into one unit does not result in a reduction in the overall number of Accessible Housing Units required in a project.

One commenter requested clarification on what is meant by “dedicate” in Sections 10325(f)(7)(K)(i) and (ii). One commenter stated that if the intent to replace “provide” with “dedicate” was to flag the requirement on housing providers to maintain the accessibility features of Accessible Housing Units over time, the commenter suggested adding “and maintain” wherever the word “dedicate” appears. The commenter recommended the deleted sections referenced in Section 10325(f)(7)(K)(i) and (ii) be restored because all of CBC 11B cannot be applied as a design standard for rehabilitation projects and would result in dozens of waivers.

In Section 10325(f)(7)(K)(ii) regarding the requirement that at least one of each common area facility type and amenities etc., one commenter recommended revising “shall also be made accessible utilizing CBC Chapter 11B” to “shall also be made accessible utilizing the Housing and Accessibility Requirements and CBC Chapter 11B.” The commenter also noted a correction from “or” to “and” in the last sentence preceding subdivision (a).

In Section 10325(f)(7)(K)(ii)(a), one commenter recommended only granting waivers when full compliance creates “physical infeasibility,” not when it is “impractical.” The commenter explained that physical infeasibility is a higher standard that means the architecture of the building makes full compliance not possible as opposed to “impractical,” which is overly broad. In the future, the commenter also suggested adopting a formal procedure applicants must use to request a waiver and objective standards for determining whether the waiver request will be granted or denied. The commenter stated that waiver requests and decisions should be documented and a matter of public record.

Response to comments: Staff agrees with the revision recommended in Section 10325(f)(7)(K) and incorporated the change in the final proposed change below.

Staff understands the concerns that accessible units required to be delivered and are frequently occupied by households that do not need accessibility features and therefore should be “made available” upon request. However, the purpose of the accessible units to be available and ready for residents when needed. For that reason, the accessible units need to be in place and ready to be leased. As it relates to the comment regarding the “double-counting” of Mobility Features and Hearing/Vision Features in a one unit, staff will consider for a future rulemaking.

In response to the concerns relating to the removal of the references in 10325(f)(7)(K)(i) and (ii), staff wanted to clarify that the legal design standards were not deleted but rather moved into the definitions of “Housing Unit with Mobility Features” and “Housing Unit with Hearing/Vision Features.” A “Housing Unit with Mobility Features,” by definition, must comply with CBC Ch. 11B 809.2-809.4 and a

“Housing Unit with Hearing/Vision Features” must comply with CBC Ch. 11B, including Section 809.5.

In response to the comments regarding “dedicate,” staff agrees and has withdrawn the proposed change from “provide” to “dedicate”. Staff also accepted the revisions by the commenter relating to the requirement that at least one of each common area facility type and amenities etc. and the correction from “or” to “and” in subdivision (ii). Staff also noted a typo in subdivision (b). All changes are incorporated in the final proposed change below.

Regarding waiver requests, staff will take formal procedure comments and consider for future rulemaking. Waiver requests and decisions are matters of public record, unless otherwise not disclosable under the PRA as determined on a case-by-case basis.

Final proposed change:

(K) Accessible Housing Unit(s). All ~~new construction~~ projects ~~providing Accessible Housing Units~~ shall comply with the Housing and Building Accessibility Requirements in addition to the following, unless otherwise specified:~~shall adhere to the provisions of California Building Code (CBC) Chapter 11(B) regarding accessibility to privately owned housing made available for public use in all respects except as follows: instead of the minimum requirements established in 11B 233.3.1.1 and 11B 233.3.1.3, all~~

~~(nnn)~~(i) All new construction projects must provide~~dedicate~~ a minimum of fifteen percent (15%) of the Low-Income Units as Housing Units with ~~m~~Mobility ~~f~~Features~~, as defined in CBC 11B 809.2 through 11B 809.4~~, and a minimum of ten percent (10%) of the Low-Income Units ~~with~~as Housing Units with Hearing/Vision ~~communications f~~Features~~, as defined in CBC 11B 809.5. These units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project consistent with 24 CFR Section 8.26~~.

(ii) Rehabilitation projects shall provide~~dedicate~~ a minimum of ten percent (10%) of the Low-Income Units as Housing Units with ~~m~~Mobility ~~f~~Features~~, as defined in CBC 11B 809.2 through 11B 809.4~~, and four percent (4%) as Housing Units with ~~communications~~Hearing/Vision ~~f~~Features~~, as defined in CBC 11B 809.5. To the maximum extent feasible and subject to reasonable health and safety requirements, these units shall be distributed throughout the project consistent with 24 CFR Section 8.26~~. At least one of each common area facility type and amenity, ~~as well as~~ paths of travel between accessible units and such facilities and amenities, the building entry and public right of way, and the leasing office or area shall also be made accessible utilizing the Housing and Accessibility Requirements and CBC Chapter 11~~(~~B~~)~~ as a design standard. In all other respects, applicable building code will apply. Projects with other~~particular~~ federal, state, or local funding sources may be required to meet additional accessibility requirements ~~related to these other sources~~. The Executive Director may approve a partial or full waiver to the requirements for the number of Accessible

Housing Units exceeding those required by the ADA, Section 504, and~~or~~ CBC Ch. 11B provided both of the following are met:

(a) The exemption does not pertain to any accessibility features required by applicable building codes, the CBC Chapter 11B, or federal law. The CBC Ch. 11B and federal law minimums are calculated on all units in the project, not just restricted units, and

(b) The Applicant and its architect demonstrate that full compliance with subsection (f)(7)(K)(ii) would be impractical or create an undue financial and administrative burden. Accessibility must be provided to the maximum extent feasible and the waiver must be obtained in advance.

(iii) Accessible Housing Units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project and be available in a sufficient range of sizes and amenities so that an individual with disabilities' choice of living arrangements is comparable to that of other persons eligible for housing assistance under the same project consistent with 24 CFR Section 8.26.

(L) Waiver.~~Except for paragraph (J) and (K), i~~If a rehabilitation applicant does not propose to meet any of the requirements of subdivisions (f)(7)(A) through (I)~~this subsection~~, its CNA~~apital Needs Assessment~~ must show why the requirements not being ~~that the standards not proposed to be~~ met are either unnecessary or excessively expensive. ~~The Executive Director may approve a waiver to paragraph (J) for a new construction or rehabilitation project, provided that tenants will have equivalent access to management services. The Executive Director may approve a waiver to paragraph (K) for a rehabilitation project, provided that the applicant and architect demonstrate that full compliance would be impractical or create an undue financial burden and not in conflict with federal or state law.~~ All waivers must be approved in advance by the Executive Director.

31. Section 10325(f)(7)(M), (M)(ii) and (iii): Compliance and verification

The proposed changes improve the reading of the text by cross-referencing specific subdivisions. For subdivision (iii), the proposed language clarifies the required documentation to be submitted in the place-in-service application. (Page 72-73)

Comments received: Eight commenters recommended that CTCAC require applicants to consult with a Certified Access Specialist (CASp) or accessibility-specialized architect prior to building permit issuance to ensure that plans are appropriate before construction commences rather than after construction completion as is too late and has proven to be costly and logistically problematic.

One commenter opposed the proposed change stating it was unnecessary and that the architect can confirm compliance of the accessible housing units. One commenter noted that by engaging a CASp or accessibility-specialized architect will add roughly $50,000 in cost per project.

Two commenters recommended that CTCAC defer compliance requirements to the federal, state, and local requirements already in place rather than creating a new layer that may be in conflict with other regulators' requirements.

One commenter suggested that failure to demonstrate compliance with accessibility requirements should result in disqualification, not just negative points. The commenter explained that disability access is a civil right and CTCAC should not entertain applications with known disability access violations, especially when there is a critical shortage of affordable accessible housing.

Response to comments: Staff has revised the language to add consistency with the CASp requirement in Section 10325(c)(8)(B) and is incorporated in the final proposed change below.

The regulations do not prohibit applicants to consult a CASp prior to issuance of building permits. The CASp or architect with demonstrated experience meeting federal accessibility standards certification is to ensure the compliance with the requirement.

While Section 10325(f)(7)(M)(iv) only references negative points, the Committee reserves the right to disqualify applicants for any reason under Section 10325(f)(6).

Final proposed change: Proceed as initially proposed except as noted below

(iii) For compliance with subdivision~~Subsection~~ (f)(7)(K), the project architect shall provide third party documentation confirming compliance by a CASp~~ with demonstrated experience meeting federal accessibility standards,~~ or by an architect with demonstrated experience meeting federal accessibility standards.

32. Section 10325(f)(8): Deferred-payment financing, residual receipts payment financing, grants and subsidies

The proposed change clarifies the requirement for deferred-payment financing, residual receipts payment financing, grants and subsidies. For subdivision (F), the proposed change updates update abbreviations. (Page 73)

Comments received: None

Final proposed change: Proceed as initially proposed

33. Section 10325(g)(1)(A), (D), (E) and (G): Large Family projects

The proposed changes add numbering and lettering to hanging paragraphs, cross-reference other subdivisions and improve the reading of the text. For subdivision (D), the proposed change clarifies the distance and how the distance is calculated for the requirement to be waived. (Page 75-77)

Comments received: To ensure equal access to project amenities for families with disabled members, one commenter suggested the following addition in subdivision (E): “In Housing Units with Mobility Features, washing machines and clothes dryers must comply with CBC 11B-611, be front-loading, and must be the same or equivalent type as provided in comparable units that do not have mobility features. In projects where washing machines and clothes dryers are provided in common areas, at least some washing machines and some clothes dryers must be front-loading and comply with CBC 11B-611.”

Response to comments: Staff appreciates the comment and will consider for future rulemaking.

Final proposed change: Proceed as initially proposed

34. Section 10325(g)(2)(B)-(K): Senior projects

The proposed changes add numbering and lettering to hanging paragraphs, cross-reference other subdivisions, reference federal and state codes, reference definitions proposed in #1 above, provide additional clarification to the requirements of Accessible Housing Units and improve the reading of the text. For subdivision (G), the proposed change clarifies the requirement for emergency call systems for frail elderly populations requiring assistance with activities of daily living within the Seniors housing type. (Page 77-78)

Comments received: One commenter reiterated their comments on Section 10325(f)(7)(K) on HUD’s prohibition against double-counting units with both Mobility and Hearing/Vision features, replacing “impractical” with “physically infeasible” as a basis for obtaining a waiver of accessibility requirements, and our suggestion that CTCAC adopt a formal process and objective standards for granting waivers of accessibility requirements. The commenter also reiterated their comments on Section 10325(g)(1)(G) regarding accessible washers and dryers in Housing Units with Mobility Features into subdivision (J). The commenter also noted a typo in Section 10325(g)(2)(C)(ii) where it references subdivision (g)(2)(C) when it should be subdivision (g)(2)(B).

Two commenters stated that the removal of the term “accessible route” in Section 10325(g)(2)(B) is a substantial expansion of the accessibility requirements for senior housing and is impractical to fulfill. The commenters explained that there should be no reason to spend tax credits and public funding on accessibility features that are only capable of being accessed by stairs or other physical barriers.

One commenter stated that the percentage of Low-Income Units as Housing Units with Mobility Features should not be increased to 50% in subdivision (B). If so, the commenter suggested delaying the change until 2027 due to the extended timelines for cities and counties to approve plans. The commenter supported the proposed change to subdivision (G). The commenter did not agree with the removal of the common areas being within one-half mile of the subject property as senior projects are sometimes part of master planned communities and it is helpful to allow developers to congregate common areas as appropriate for their tenants. At the very least, the commenter suggested changing the one-half mile to one-quarter mile.

Response to comments: Staff is appreciative of the comments and will consider for future rulemaking. Staff made the correction to the typo and the change is incorporated in the final proposed change below.

The removal of the term "accessible route" is simply from regulation text but still applies by reference in the definition of Housing Units with Mobility Features.

In response to the comment regarding an increase to 50% in subdivision (B), the language was simply restated from one half and is not resulting in an increase. With regard to the common area, staff has revised the language reducing the distance from one-half mile to one-quarter mile.

Final proposed change: Proceed as initially proposed except as noted below

(C) ~~All projects with elevators must comply with CBC Chapter 11(B) accessibility requirements for elevators. All project owners must provide adequate and visible notice to tenants of their ability to request conversion of their adaptable unit to an accessible unit. These units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project consistent with 24 CFR Section 8.26.~~ The Executive Director may approve a partial or full waiver to the requirements for the number of Accessible Housing Units exceeding those requirement by the ADA, Section 504, or CBC Ch. 11B provided:~~in advance for a rehabilitation project, provided that the applicant and architect demonstrate that full compliance would be impractical or create an undue financial burden;~~

(i) the exemption does not pertain to any accessibility features required
by the Housing and Building Accessibility Requirements, including the required minimum five percent (5%) Units with mobility features. The CBC Ch. 11B and federal law minimums are calculated on all units in the project, not just restricted units, and

(ii) ~~1.~~ Consistent with subsection Section 10325(f)(7)(M)(iii), the Applicant and its architect demonstrate that full compliance with subdivision (g)(2)(B~~C~~) would be impractical or create an undue financial and administrative burden. Accessibility must be provided to the maximum extent feasible and the waiver must be obtained in advance.

(H) For projects exceeding 20 units, ~~C~~common areas shall be provided on site, or within approximately one-~~half~~quarter mile of the subject property. For purposes of this part, common areas and shall include all interior amenity space, such as the rental office, community room, service space, computer labs, and gym, but shall not include laundry rooms or manager living units.

35. Section 10325(g)(4), (4)(B)(i) and (4)(B)(vi): At-Risk projects

The proposed changes add numbering and lettering to hanging paragraphs, cross-reference other subdivisions, reference state codes, update abbreviations and improve the reading of the text. (Page 81-82)

Comments received: None

Final proposed change: Proceed as initially proposed

36. **Section 10326(a)**

The proposed change updates an abbreviation. (Page 84)

Comments received: None

Final proposed change: Proceed as initially proposed

37. **Section 10326(g)(1) and (3)**

The proposed changes cross-reference the tax-exempt bond application requirements for site control and local approvals and zoning to the 9% application requirements in Sections 10325(f)(1) and 10325(f)(4). (Page 85-86)

Comments received: None

Final proposed change: Proceed as initially proposed

38. **Section 10326(g)(9) and (j)(2)**

The proposed change updates abbreviations. (Page 87-88)

Comments received: None

Final proposed change: Proceed as initially proposed

39. **Section 10327(c)(2)(A), (B)(i) and (ii)**

The proposed changes references definitions proposed in #1 above. (Page 89-90)

Comments received: None

Final proposed change: Proceed as initially proposed

40. **Section 10327(c)(5)(A): Basis Limit increase for prevailing wage**

The proposed change clarifies that the 20% increase to the basis limit is permitted for developments subject to the requirement to pay prevailing wages on the entire project. (Page 92)

Comments received: Two commenters supported the proposed change to require all of a development to be subject to prevailing wage requirements in order to receive a threshold basis limit increase. Three commenters suggested clarification on what is meant by “entire project” and stated that proof of prevailing wages is typically submitted for the construction contract only and asked for clarification as to whether the proposed change will require additional evidence.

Response to comments: The “entire project” was added to clarify that being required to pay prevailing wage on a portion of the project would not warrant a basis limit increase. No additional documentation beyond what is currently required in the regulations needs to be submitted.

Final proposed change: Proceed as initially proposed

41. Section 10327(c)(5)(C) and (f)

The proposed change updates an abbreviation. (Page 95 and 98)

Comments received: None

Final proposed change: Proceed as initially proposed

42. Section 10328(a)(4)

The proposed change cross-references the rent increase limit moved to a newly proposed Section 10336(a). (Page 100-101)

Comments received: None

Final proposed change: Proceed as initially proposed

43. Section 10328(f)

The proposed change references state codes. (Page 102)

Comments received: None

Final proposed change: Proceed as initially proposed

44. Section 10328(g)(2) and (6)

The proposed changes improve the reading of the text. (Page 103)

Comments received: None

Final proposed change: Proceed as initially proposed

45. Section 10330(a)(2)-(8) and (b)(1)-(2): Appeals

In subdivision (a)(2)-(8), the proposed changes clarify the only instances where an appeal may be filed and reference other subdivisions. For subdivision (b)(1) and (2), the proposed changes clarify the timing is based on calendar days and increase the response time for the appeal to the Executive Director from 5 days to 10 days to allow for a more thorough review. (Page 103)

Comments received: None

Final proposed change: Proceed as initially proposed

46. Section 10337(b)(2): Accessible units

The proposed change moves language regarding accessible units to the newly proposed Section 10336(b)(2)(B)(i). (Page 110)

Comments received: None

Final proposed change: Proceed as initially proposed

47. Section 10337(c)

The proposed change references the CTCAC Compliance Manual. (Page 111)

Comments received: One commenter stated that Section 10337(c)(1) and (3) should include recordkeeping and reporting, by unit number for accessible units, on occupancy of accessible units by individuals with disabilities who need the features, documenting the need for the features. The commenter added that it should also include recordkeeping and reporting on requests and responses related to reasonable accommodations, reasonable modifications, provisions of auxiliary aids and services for effective communication, and grievances.

Response to comments: Staff declines to expand the record keeping requirements at this time, but will consider the request in future rulemaking.

Final proposed change: Proceed as initially proposed

48. Section 10337(c)(3)(I): Annual certifications

The proposed change adds to one item to the existing list of items that must be certified by the owner annually to ensure compliance with local, state, and federal laws, constitutions, codes, standards, rules, guidelines, and regulations, including, without limitation, those that pertain to accessibility, construction, health and safety, labor, fair housing, fair employment practices, affirmatively furthering fair housing, nondiscrimination, and equal opportunity. (Page 112)

Comments received: One commenter stated that applicants should be required to disclose any regulatory or investigative proceeding by local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of fair housing or anti-discrimination laws and the status of the proceeding, as applicable.

Response to comments: Consistent with other requirements for applicants to disclosure the status of potential fair housing violations, staff added language clarifying that a certification under Section 10337(c)(3)(I) includes certifying as to the status of any active claims regarding potential or actual violations of the Fair Housing Laws which is incorporated in the final proposed change below.

Final proposed change:

(I) the project complied with local, state, and federal laws, constitutions, codes, standards, rules, guidelines, and regulations, including, without limitation, those that pertain to accessibility, construction, health and safety, labor, fair housing, fair employment practices, affirmatively furthering fair housing, nondiscrimination, and equal opportunity and is not the subject of any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of the Fair Housing Laws.

SUBSTANTIVE CHANGES

1. Section 10315(a) and (b): Changes to the Nonprofit set-aside

The proposed change reduces the required units designated for people experiencing Homelessness from 50% to the greater of 15 Low-Income Units or 25% of the Low-Income Units and adds the requirement that the average targeted income for those units to not exceed 40% AMI. The proposed change aligns with the proposed change to the Special Needs housing type requirement. (Page 13-14)

Comments received: Nine commenters supported proposed change to reduce the required units designated for people experiencing Homelessness from 50% to the greater of 15 Low-Income Units or 25% of Low-Income Units. Two of the commenters explained that 100% homeless developments have proven to be operationally and financially challenging, and experience has shown that developments with more than 25% homeless units tend to become 100% homeless developments. One of the commenters further explained that by aligning CTCAC's homeless assistance apportionment with CDLAC's homeless set-aside, developers are more easily able to pursue alternative funding strategies. One commenter stated that by reducing the threshold, it would enable housing projects to leverage both tax credits and Section 811 funding and will help foster integrated, community-based living environments that will encourage more projects to be disability inclusive at the 25% level rather than fewer projects that concentrate disabled individuals in segregated, specialized settings. One commenter suggested removing the "greater of 15 Low-Income Units or" text from the proposed change and implementing a cap on the number of Homeless assistance units. Six commenters suggested reducing the project-based rental assistance priority requirement from 50% to 25% to align with the proposed change.

Four commenters opposed the proposed change to reduce the required units designated for people experiencing Homelessness from 50% to the greater of 15 Low-Income Units or 25% of Low-Income Units. Multiple commenters explained that it would reduce the number of supportive housing units being developed for people experiencing homelessness at a time when there is still a major homelessness crisis throughout California. While two of the commenters appreciates the effort to balance the effect of this reduction by raising the Special Needs housing type goal from 30% to 40%, there is no way to know if the increase will offset the reduction in required units and recommends increasing of the Special Needs housing type goal without any reduction in the number of required units. One of the commenters urged CTCAC, the Department of Housing and Community Development (HCD) and/or the California Housing Partnership conduct a thorough analysis of how these changes in unit requirements and lifting the Special Needs cap might impact the overall production of supportive housing units to make an informed decision.

One commenter opposed the proposed change to reduce the required units designated for people experiencing Homelessness from 50% to 25% of Low-Income Units, though supported the "greater of 15 Low-Income Units" as a minimum. The commenter stated that the balance of PSH and VLI units allows for a more diverse community experience. At 25%, the commenter stated that it would be a race to bottom and suggested moving it to the existing special needs designation of 45% is more appropriate.

One commenter stated their membership could not come to a consensus on the proposed change to reduce the required units designated for people experiencing Homelessness from 50% to the greater of 15 Low-Income Units or 25% of Low-Income Units. The commenter asked CTCAC conduct a thorough analysis of how these changes will impact supportive housing production over time.

One commenter stated that the phrase "and the average targeted income for the units is 40% AMI" is incompatible with incomes of homeless individuals. One commenter suggested adding IIG, Joe Serna Jr. Farmworker and Homekey+ funding to the list in subdivision (A). One commenter stated that the set aside should specifically benefit projects with a significant portion of Homeless units and additionally suggested adding capital funding to the priority in "2)" of Section 10315(b)(1)(A).

One commenter requested CTCAC expand its application of Housing First to all projects and not just homeless assistance projects because Welfare and Institutions Code Section 8255 applies Housing First to any program a California state agency funds, implements, or administers for the purpose of providing house or housing based services "to people experiencing homelessness or at risk of homelessness . . ." Specifically, the commenter requested the expansion of the application of Housing First to additional projects that serve people who are at risk of homelessness, like special needs projects.

Response to comments: Staff appreciates the comments both in support and opposition of the proposed change to reduce the required units designated for people experiencing Homelessness from 50% to the greater of 15 Low-Income Units or 25%

of Low-Income Units. The proposed change will allow projects to be eligible to utilize critical federal funding such as HUD's Section 811 funding in these projects. Staff will monitor the impact of this proposed change prior to considering additional adjustments and will continue to analyze the production of Special Needs units.

In response to the comments recommending the project-based rental assistance priority requirement be reduced from 50% to 25%, staff will continue to require 50% for purposes of the priority in the Nonprofit set aside. There is a benefit to prioritize projects with more project-based rental assistance when considering competing projects.

The phrase "and the average targeted income for the units is 40% AMI" referenced in the above comment is stating that the average targeted income for all units designated for people experiencing Homelessness cannot exceed 40% AMI. Staff made one minor change clarifying that the 40% AMI average targeted income requirement applies to the units designated for people experiencing Homelessness which is shown in the final proposed change below. Staff is not adding any funding sources not specifically targeted for Homeless or Special Needs projects to the existing list at this time. Furthermore, Homekey+ is included in the HCD Homekey source included on the existing list. Given the priority already given to projects with funding in subdivision (A), there is no reason to add "capital funding" to the priority for rental assistance as the priorities are weighted equally.

CTCAC regulations currently implement Housing First requirements for homeless assistance projects (Section 10315(b)) and special needs projects (Section 10325(g)(3)(K)), which includes people experiencing homeless and at-risk of homelessness. Additionally, Section 10336(b) incorporates Housing First into all written tenant selection policies.

Final proposed change: Proceed as initially proposed except as noted below

(b) Nonprofit Set-Aside Homeless Assistance Project Priority.

(1) ~~(a)~~ Each funding round, credits available in the Nonprofit set-aside shall be prioritized for qualified Homeless assistance ~~made available as a priority to~~ , meaning the greater of 15 Low-Income Units or twenty-five percent (25%) of the Low-Income Units within the project are designated for people experiencing Homelessness and the average targeted income for those units is no more than forty percent (40%) AMI, ~~projects that meet the requirements below and provide housing to Homeless households at affordable rents, consistent with Section 10325(g)(3)~~ in the following priority order:

2. Section 10315(h): Housing type goal for Special Needs and Seniors

The proposed change increases the Special Needs housing type from 30% to 40% and increases the Seniors housing type from 15% to 20%. The increase allows for more Special Needs and Senior housing type projects be recommended for an award based on their ranking without being skipped. (Page 16)

Comments received: 10 commenters supported the proposed changes to increase the Special Needs housing type to 40%. One commenter explained that by reducing the Homeless and Special Needs unit thresholds, there will be more Special Needs housing type projects which will be accommodated by the increase to the Special Needs housing type goal. One of the commenters shared concerns that Special Needs projects will outperform Senior projects due to higher final tie breaker scores and suggested establishing a minimum credit allocation of 15% for the Senior housing type with a limit of 20%.

22 commenters supported the proposed change to increase the Seniors housing type goal to 20%. The commenters explained that the proposed change will increase more affordable housing options for older adults as some of them struggle with fixed incomes and rent burden. With the proposed change, the commenters stated that will help house California's growing low-income older adult population and help ensure they have the support to live independently as long as possible. Two commenters encouraged that a minimum allocation of 15% be set to reflect the accelerating housing insecurity among older adults.

Response to comments: Staff appreciates the comments received in support of the increase to the housing type goals. Staff declines the request to establish a minimum credit allocation for Senior housing type projects at this time as no other housing type has a minimum credit allocation. Staff will monitor the impact of this proposed change prior to considering additional adjustments.

Final proposed change: Proceed as initially proposed

3. **Section 10317(c): Federal and state credit exchanges**

For instances where state credits are exchanged for federal credits, the proposed change allows the maximum annual federal credit award to exceed the limit required in Section 10325(c)(9)(C). (Page 18)

Comments received: 10 commenters supported the proposed change to help CTCAC better manage the current overallocation of state credits. One of the commenters suggested expanding the exception to additional projects at the federal credit maximum so they can exchange state credits for federal credits to meet CTCAC's credit availability.

Response to comments: Staff declines the request to further expand this requirement to projects outside of those CTCAC determines a credit exchange is necessary at this time. Staff will monitor the impact of this change on the overallocation of state credits.

Final proposed change: Proceed as initially proposed

4. **Section 10317(j)(1): State credits**

The proposed change updates an abbreviation for CDLAC and allows for any state credit available to Farmworker Housing be available to the aggregate amount of credits after the final funding round. (Page 20)

Comments received: Four commenters supported the proposed change that any state credit available to Farmworker Housing be available to the aggregate amount of credits after the final funding round. To further strengthen alignment with AB 3035 and support farmworker housing, two of the commenters recommended allowing unused state credits for Farmworker Housing to roll over to future rounds and even future years if there are applications.

Response to comments: Staff declines to allow state credits for Farmworker Housing to roll over to future years as statute requires them to be available to the aggregate amount at the end of the year.

Final proposed change: Proceed as initially proposed

5. **Section 10322(d): Incomplete applications**

The proposed change provides clarification on what deems an application to be incomplete, the disqualification of an incomplete application and cross-references the appeal processes for those disqualifications. (Page 25)

Comments received: None

Final proposed change: Proceed as initially proposed

6. **Section 10322(e): Application omissions**

The proposed change provides clarification on what constitutes application omissions and the criteria for which the submission of additional documents is acceptable. (Page 25-26)

Comments received: Nine commenters supported the additional flexibility to submit omitted documents previously in existence as of the application date.

Final proposed change: Proceed as initially proposed

7. **Section 10322(h)(10): Market study submission requirements**

The language proposed to be removed only adds confusion in conjunction with the 180-day requirement. The proposed change clarifies that a market study must be prepared or updated within 180 days of the application filing deadline. (Page 31)

Comments received: None

Final proposed change: Proceed as initially proposed

8. **Section 10322(h)(21): California Utility Allowance Calculator (CUAC) requirements**

The proposed changes remove references to specific sections of the regulations that no longer exist and broaden the use of the CUAC for existing tax credit projects. With improvements to the CUAC, the proposed change removes the requirement for a quality control review be completed and corresponding fees be submitted to CTCAC. (Page 32-33)

Comments received: Nine commenters supported expansion of the CUAC eligibility, which will support the greening of existing affordable housing and ensure that utility allowances reflect accurate utility costs to tenants. One commenter supported the streamlined process.

Two commenters supported the proposed change with a suggested revision to remove “through a solar program” to explicitly allow owners the choice to install solar systems using private financing. The commenters stated that a solar system can be installed without going through a solar program. Alternatively, one of the commenters suggested defining what a “solar program” is. That commenter also recommended adding other qualified independent professionals, such as a NABCEP PV System Inspector, approved by CTCAC to certify to the CUAC. The commenter explained that a NABCEP PV System Inspector would reduce the overall cost of the system installation through competition of allowing more qualified professionals to inspect the systems, provide more opportunities for workforce development in the renewable energy sector, and add higher safety and quality inspections that exceed that of a HERS Rater. The commenter suggested changing “gross” rent to “net” rent or defining Gross Rent by adding an example to add clarity. Another commenter supported the proposed changes to remove references to specific sections of the regulations that no longer exist, broaden the use of the CUAC for existing tax credit projects, and removal of the quality control requirement.

Two commenters opposed the removal of the requirements as they serve as necessary safeguards for tenants. One of the commenters also recommended the addition of a true-up process post-CUAC implementation at a given project that will measure actual tenant energy use and require utility allowance adjustments in case of discrepancies between CUAC estimates and actual energy usage. The concerns shared by the commenters was that expanding the CUAC will result in lower utility allowances and rent increases to the tenants.

Response to comments: Staff appreciates the comments received and agrees to remove the “through a solar program” as requested. The change is shown in the final proposed change below. Staff proposed a definition for “Gross Rent” and it can be located in Section 10302(h)(h).

Staff declines to expand the certification of the CUAC to other qualified independent professionals at this time but will consider for future rulemaking.

Final proposed change:

(21) Utility allowance estimates. Current utility allowance estimates consistent with 26 CFR Section 1.42-10. The applicant must indicate which components of the utility allowance schedule apply to the project. For buildings that are using an energy consumption model utility allowance estimate, the estimate shall be calculated using the most recent version of the California Utility Allowance Calculator (CUAC) developed by the California Energy Commission (CEC), and incorporated in the CEC's compliance program (CBECC). The CUAC estimate shall be signed by a California Association of Building Energy Consultants (CABEC) Certified Energy Analyst (CEA). Measures that are used in the CUAC that require field verification shall be verified by a certified HERS Rater, in accordance with current HERS regulations. Use of CUAC is limited to (i) new construction projects, (ii) rehabilitation projects applying for tax credits ~~for which the rehabilitation improves energy efficiency by at least 20%, as determined~~ consistent with the requirements of Section 10325(~~c~~f)(~~5~~7)(~~D~~A) ~~and (G), or installs solar generation that offsets 50% of tenant loads, as determined consistent with the requirements of Section 10325(c)(5)(G)~~, and (iii) existing tax credit projects with new photovoltaics installed ~~through a solar program administered by a municipal utility or joint powers authority~~, which offsets tenants' electrical load, and which includes site installation verification by a qualified HERS Rater. Projects utilizing the CUAC are approved for use upon the field verifications being completed. For projects using the CUAC where the field verification has not been completed prior to occupancy, the project must use an approved utility allowance source per 26 CFR Section 1.42-10 until the field verification is completed. Owners shall provide the tenants with a 90 day notification prior to the effective date with an informative summary about the current utility allowance and the proposed CUAC allowances before the utility allowances can be used in determining the gross rent of rent-restricted units. For projects applying for tax credits, the CUAC with supporting documentation shall be submitted in the Placed-in-service application required in Section 10322(i). ~~The CUAC and supporting documentation requires a quality control review and CTCAC approval following submission in the Placed-in-service application.~~ For existing tax credit projects not applying for tax credits, the CUAC with supporting documentation shall be submitted to CTCAC upon field verification completion for ~~a quality control review and~~ CTCAC approval. ~~CTCAC will submit modeled CUAC utility allowance estimates to a quality control reviewer and shall establish a fee to cover the costs for this review.~~

9. Section 10325(c)(9)(C): Tie breaker bonus for high or highest resource areas

In prior rounds there have been instances where projects requesting this bonus were skipped because the housing type goal was met as required in the first tie breaker, which conflicts with our public policy to incentivize projects located in high and highest resource areas. The proposed change will establish that once the housing type goal has been met in the round both within the Rural set aside and overall, the bonus will no longer apply and the project would cease to be a Large Family New Construction project receiving the tie breaker increase for being located in a highest or high resource area and therefore not be skipped. (Page 59)

Comments received: Six commenters supported the proposed change to turn off the final tie breaker bonus when the Large Family New Construction project receiving the tie breaker increase for being located in a highest or high resource area housing type goal has been met but further recommended to amend the third paragraph of Section 10325(c)(9) excluding Highest or High Opportunity developments from being skipped. Two commenters supported the proposed change but noted that Section 10315(h) still only allows a project to compete in one of the housing types. The commenter recommended that Section 10315(h) be clarified to allow projects that compete as a Large Family New Construction high resource housing type, when unsuccessful in the housing type goal tie breaker, to then be allowed to compete as a Large Family housing type project with their high resource tie-breaker bonus turned off, which is especially important for the rural areas where the goal is often met, resulting in the skipping of other high scoring rural projects.

Response to comments: Staff appreciates the comments and suggestions to revise the third paragraph in Section 10325(c)(9). The proposed change accomplishes the intent of removing the tie breaker bonus once the housing type goal is met in either the Rural set aside or the round overall. In response to the concerns with Section 10315(h), the project will be competing as a Large Family New Construction receiving the tiebreaker increase for being located in census tracts, or census block groups as applicable, designated on the CTCAC/HCD Opportunity Area as Highest or High Resource Areas. Once the housing type goal has been met and the project no longer receives the tie breaker bonus, the housing type automatically change to the Large Family housing type.

Final proposed change: Proceed as initially proposed

10. **Section 10325(f)(4): Local approvals and zoning**

The proposed change broadens the required documentation to allow for projects with streamlined, "by-right" or ministerial approvals to meet the local approvals and zoning requirements and apply for tax credits. The proposed change would increase the number of eligible projects for tax credits. In addition, the proposed changes add lettering to hanging paragraphs and improves the reading of the text. The proposed change to add subdivision (E) would exempt rehabilitation projects from the requirement if they do not require land use approvals. (Page 68)

Comments received: Seven commenters supported the proposed change to allow applicants to demonstrate land use readiness with an attorney letter confirming eligibility for by-right entitlements. Three of the commenters recommend that the language refer to an "attorney letter" rather than a "legal opinion," because the latter adds to cost without adding benefit. Two commenters suggested replacing "legal opinion" be replaced with a "letter from legal counsel or a qualified consultant".

Response to comments: Staff accepted the suggestion to change "legal opinion" to "attorney letter" and the change is reflected in the final proposed change below.

Final proposed change: Proceed as initially proposed except as noted below

(C) Documentation required to meet the evidentiary burden under subdivision (A) must describe the local approval process, the applicable approvals, and whether each required approval is "by right," ministerial, or discretionary. In lieu of a local land use approval, projects that qualify for "by right" or ministerial approval may submit confirmation of a development's eligibility for such approval from HCD's Housing Accountability Unit or a third-party attorney letter~~legal opinion~~ that explains how the project complies with the applicable requirements.

11. Section 10325(f)(7)(A) and (M)(i): Energy efficiency

The proposed changes add an alternative option for projects with buildings that are electric ready and streamlines the documentation requirement for energy efficiency by requiring a certification from a certified HERS Rater in the placed-in-service application in lieu of the Sustainable Building Methods Workbook. This will expedite the process for both the applicant and CTCAC staff. (Page 69 and 72)

Comments received: Six commenters supported the proposed change to add the alternative energy efficiency option for rehabilitation projects in sub-section (ii). Four of the commenters suggested to change the "At least 2/3 of the end uses" to "at least two out of three of the end uses" to add clarity on how the 2/3 is measured. Another commenter suggested to change the "At least 2/3 of the end uses" to "at least two or three of residential end uses" to add clarity on how the 2/3 is calculated and how it applies to projects with residential and commercial spaces.

Two commenters recommended that the roles of the HERS rater and Certified Energy Analyst's responsibilities be clarified. The commenters explained that a HERS Rater's job is to inspect the final installation of energy-efficient measures (equipment) for the purpose of verifying the equipment meets the energy-efficiency specifications of the manufacturer's requirements whereas a Certified Energy Analyst's (CEA) responsibility is to prepare a Sustainable Building Methods Workbook (Workbook) as a means to determine if a project has met an energy efficiency goal. The commenters added that a HERS Rater typically would not be able to certify to a project attaining such goal and further explained that the preparation of a Workbook is necessary for determination of whether a goal has been. The Workbook along with a report from the CEA basically serves as a certification that a goal has been attained and cannot be obtained simply by an observation of a final installation by a HERS Rater or anyone else.

One commenter supported the removal of the requirement to provide the Workbook.

Response to comments: Staff has clarified the language in Sections 10325(f)(7)(A)(ii) and 10325(f)(7)(H) in response to comments and the changes are incorporated in the final proposed changes below.

Final proposed change: Proceed as initially proposed except as noted below

(A) Energy Efficiency. All rehabilitated buildings, both competitive and non-competitive, shall meet one of the following:~~have improved energy efficiency above the modeled energy consumption of the building(s) based on existing conditions documented using the Sustainable Building Method Workbook's CTCAC Existing Multifamily Assessment Protocols and reported using the CTCAC Existing Multifamily Assessment Report template. Rehabilitated buildings shall document at~~

(i) Achieve least a 10% post-rehabilitation improvement over existing conditions energy efficiency achieved for the project as a whole, except that Scattered Site applications shall also document at least a 5% post-rehabilitation improvement over existing conditions energy efficiency achieved for each site. In the case of projects in which energy efficiency improvements have been completed within five years prior to the application date or since the last tax credit award pursuant to a public or regulated utility program or other governmental program that established existing conditions of the systems being replaced using a HERS Rater, the applicant may include the existing conditions of those systems prior to the improvements. ~~Furthermore, rehabilitation applicants must submit a completed Sustainable Building Method Workbook with their placed-in-service application unless they are developing a project in accordance with the minimum requirements of Leadership in Energy & Environmental Design (LEED), Passive House Institute US (PHIUS), Passive House, Living Building Challenge, National Green Building Standard ICC / ASRAE – 700 silver or higher rating or GreenPoint Rated Program.~~

~~a.~~(ii) At least 2 out of ~~/~~3 ~~of~~ residential end uses (cooking, space heating, and water heating) are electrified, or the building(s) is electric ready as defined in Section 160.9 of the 2022 Building Energy Efficiency Standards.

(M) Compliance and Verification. The following are required with an Applicant's~~:~~ ~~For~~ placed-in-service applications~~s~~:~~,~~

(iv) For compliance with subdivision (f)(7)(A), applicants with rehabilitation projects, with the exception of applicants developing a project in accordance with the minimum requirements of LEED, PHIUS, Passive House, Living Building Challenge, National Green Building Standard ICC / ASRAE – 700 silver or higher rating, or GreenPoint Rated Program, must submit a certification of compliance from a California Association of Building Energy Consultants (CABEC) Certified Energy Analyst (CEA) or a ~~completed~~third-party certified HERS Rater ~~Sustainable Building Method Workbook for subsection (A)~~, as applicable.

12. Section 10325(f)(9): Project size

The proposed change increases the project size limit for Rural set-aside project by 25% from 80 Low-Income Units to 100 Low-Income Units to allow for larger projects in rural areas. (Page 73)

Comments received: Seven commenters supported the proposed change.

Final proposed change: Proceed as initially proposed

13. Section 10325(g)(3) and (3)(A)-(K): Special Needs projects

The proposed change reduces the required units designated for Special Needs from 45% to the greater of 15 Low-Income Units or 25% of the Low-Income Units. The proposed changes add numbering and lettering to hanging paragraphs, cross-reference other subdivisions, reference definitions proposed in #1 above and improve the reading of the text. For subdivision (A), the proposed change clarifies the average targeted income of 40% be consistent with points requested in the Lowest Income point category. For subdivision (E), the proposed change adds language that conforms with other housing types relating to centralized laundry facilities. (Page 78-80)

Comments received: Seven commenters supported the proposed change to reduce the required units designated for Special Needs from 45% to 25% of Low-Income Units. Two of the commenters emphasized that a high minimum percentage of units for this group contradicts the integration mandate of the Supreme Court's Olmstead decision, which emphasizes the right of people with disabilities to live and participate in community settings rather than isolated, institutionalized ones. Furthermore, the commenters stated that the lowering to 25% will allow projects to leverage Section 811 projects since the limit to be eligible for those funds is 25%. Three of the commenters suggested removing the "15 Low-Income Units" language. The commenters stated that Section 811 has an absolute limit of 25% which would not work for projects with fewer than 60 units if the "15 Low-Income Units" language is added. The commenter added that eliminating the 15-unit minimum would also align with the MHP Special Needs Housing Type, which does not have a minimum. One commenter also suggested establishing a maximum threshold for Special Needs project to prevent the creation of segregated housing environments and prioritize developments that serve multiple populations to provide opportunities for shared experiences, mutual support, and broader community integration.

One comment suggested delaying the proposed change to reduce the required units designated for Special Needs until the 2025 third 4% round to lower the impact on projects already structured with 45% Special Needs units and would make it fair to existing deals that have been planned for years.

Five commenters opposed the proposed change to reduce the required units designated for Special Needs from 45% to the greater of 15 Low-Income Units or 25% of Low-Income Units. Some commenters explained that it would reduce the number of supportive housing units being developed for people experiencing homelessness at a time when there is still a major homelessness crisis throughout California. One commenter noted that a higher minimum percentage is needed in some cases and supported an inclusive and community-based housing landscape where people with disabilities can live alongside those without disabilities. While the commenters appreciate the effort to balance the effect of this reduction by raising the Special Needs housing type goal from 30% to 40%, there is no way to know if the increase will offset the reduction in required units and recommends increasing of the Special Needs housing type goal without any reduction in the number of required units. One commenter stated that policies should be implemented that reaffirm the commitment to and strengthen the supportive housing model and expand the supply of badly needed supportive housing across our state, not policies that seek to diminish the number of supportive housing units created moving forward. One of the commenters supported the "greater of 15 Low-Income Units" as a minimum explaining that the balance of PSH and VLI units allows for a more diverse community experience and at 25%, it would be a race to bottom.

One commenter stated their membership could not come to a consensus on the proposed change to reduce the required units designated for Special Needs from 45% to the greater of 15 Low-Income Units or 25% of Low-Income Units. The commenter asked CTCAC conduct a thorough analysis of how these changes will impact supportive housing production over time.

One commenter reiterated their comments on Sections 10325(g)(1)(G) and 10325(g)(2)(J) regarding accessible washers and dryers in Housing Units with Mobility Features into subdivision (E).

One commenter recommended CTCAC to further to align its requirements in subdivision (I) with those of Section 7310 of the MHP Guidelines. The MHP program's Supportive Services plan requirements are much more detailed than in subdivision (I) and include important details like communication protocols between service staff, property management, and tenants to implement eviction prevention, harm reduction, and reasonable accommodation policies.

Response to comments: In an effort to continue to leverage federal dollars in supportive housing for persons with disabilities, staff agrees to allow projects with committed HUD Section 811 funding to be considered if at least 25% of the Low-Income Units in the project are serving Special Needs populations without the 15 Low-Income Unit minimum. The proposed change will allow all Special Needs projects to be eligible to utilize critical federal funding in these projects. Staff will monitor the impact of this proposed change prior to considering additional adjustments and will continue to analyze the production of Special Needs units.

For the comments received on subdivisions (E) and (I), staff will consider the comments in a future rulemaking.

Final proposed change: Proceed as initially proposed except as noted below

(3) Special Needs projects. To be considered Special Needs~~ housing~~, ~~at least ~~the greater of 15 Low-Income Units or ~~45%~~25% of the Low-Income Units in the project shall serve Special Needs~~serve p~~Population(s~~) that meet one of the following: are individuals living with physical or sensory disabilities and transitioning from hospitals, nursing homes, development centers, or other care facilities; individuals living with developmental or mental health disabilities; individuals who are survivors of physical abuse; individuals who are homeless as described in Section 10315(b); individuals with chronic illness, including HIV; homeless youth as defined in Government Code Section 12957(e)(2); families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; or another specific group determined by the Executive Director to meet the intent of this housing type. The Executive Director shall have sole discretion in determining whether or not an application meets these requirements~~. The 15 Low-Income Unit minimum shall not apply to projects with

committed HUD Section 811 funding. ~~A~~any development with~~that is~~ less than 75% of the Low-Income Units serving ~~s~~Special ~~n~~Needs Population(s), the non-Special Needs units shall either ~~meet one of the following criteria~~: (i) ~~the non-special needs Low-Income Units~~ meet the ~~l~~Large ~~f~~Family, ~~s~~Senior, or SRO housing type requirements; or (ii) ~~the non-special needs Low-Income Units~~ consist of at least 20% one-bedroom units and at least 10% larger than one-bedroom units. Special Needs~~The~~ applications shall also meet the following ~~additional threshold requirements~~:

14. Section 10325(g)(5)(A), (D) and (G): SRO projects

The proposed changes improve the reading of the text. For subdivision (A), the proposed change clarifies the average targeted income of 40% be consistent with points requested in the Lowest Income point category. For subdivision (G), the proposed change adds language that conforms with other housing types relating to centralized laundry facilities. (Page 82)

Comments received: One commenter reiterated their comments on Sections 10325(g)(1)(G), 10325(g)(2)(J), and 10325(g)(3)(E) regarding accessible washers and dryers in Housing Units with Mobility Features into subdivision (G).

Response to comments: Staff will consider the comments in a future rulemaking.

Final proposed change: Proceed as initially proposed

15. Section 10327(c)(5)(B) and (B)(1)-(11): Basis Limit increase energy efficiency, resource conservation, or indoor air quality items

The proposed changes allow for additional basis limit increases for projects proposing all electric (20%) or electric ready (15%) projects. The proposed changes also streamline the documentation requirement for energy efficiency by requiring a certification from a certified HERS Rater in the placed-in-service application in lieu of the Sustainable Building Methods Workbook. This will expedite the process for both the applicant and CTCAC staff. The proposed change in subdivision (5) removes unnecessary language as the preceding language captures the applicable Building Energy Efficiency Standards for a given project. (Page 93-94)

Comments received: Seven commenters supported the proposed change to add basis limit increases for proposing all electric (20%) or electric ready (15%) projects as they will provide project owners incentives to transition low-income housing to building decarbonization. One of the commenters recommended clarification that only the residential portion be all electric to receive the basis limit increase. Three of the commenters suggested some modifications to the proposed language to clarify that the increase 15% for electric ready only be available for rehabilitation projects as Section 160.9 of the 2022 Building Energy Efficiency Standards is already a mandatory requirement for newly constructed buildings. In addition, one of the commenters recommended that the 20% increase for all electric be increased to a more substantial increase of 25% because all electric installation achieves greater building decarbonization benefit because all of the end-uses in the building are upgraded and achieves the benefits of building decarbonization immediately upon occupancy after the project is completed.

One commenter stated that due to the California building code requirements most projects will meet the requirements of subdivision (1) and (2) and be eligible for those increases. That may be the intent of the change, but the commenter does not think it will incentivize developers to change energy efficiency/resource conservation in their projects.

One commenter supported the removal of the requirement to provide the Workbook.

Response to comments: In response to comments, staff has clarified that the electric ready basis limit increase is only available to rehabilitation projects. The change is incorporated in the final proposed change below.

Staff is not increasing the 20% for all electric to 25% at this time though will monitor this proposed change to see if a change could be considered for future rulemaking.

Final proposed change: Proceed as initially proposed except as noted below

(B) A further increase of up to ~~ten~~twenty percent (~~10%~~20%) in the Threshold Basis Limits will be permitted for projects applying under Section 10325 or Section 10326 of these regulations that include one or more of the following energy efficiency/resource conservation/indoor air quality items:

(1) All electric. Twenty percent (20%)

(2) For rehabilitation projects, electric ready as defined in Section 160.9 of the 2022 Building Energy Efficiency Standards. Fifteen percent (15%)

16. Section 10336: Laws, rules, guidelines, and regulations for tenants of low-income units

Generally, the proposed new Section 10336 consolidates provisions concerning the protections and rights of tenants living in CTCAC monitored properties to one readily identifiable regulation. The proposed new section implements and makes more specific CTCAC's authority to limit rent increases by moving the rent increase limit standard from Section 10328(a)(4) to new Section 10336(a), specifying the Executive Director's waiver authority, and making the rent increase limit effective on all CTCAC properties starting January 1, 2025, pursuant to AB 846. Subdivision (b) of new Section 10336 restates tenant protection provisions included elsewhere in CTCAC's current regulations, implements a requirement for a tenant grievance process, and makes CTCAC's regulations consistent with existing California and federal laws concerning tenants, including non-discrimination, accessibility requirements for tenants with disabilities, and affirmatively furthering fair housing. (Page 106-109)

Comments received: Commenters were generally supportive of the proposed changes in Section 10336 some with additional comments on how to further refine the regulations.

39 commenters supported the rent increase limit requirements in Section 10336(a). One of the commenters encouraged CTCAC to further consider a lower rent increase limit in Section 10336(a) as the formula is used for rent increases in market rate housing regardless of income levels. The commenter suggested a maximum of five percent per year consistent with other states and municipalities to keep LIHTC residents safe from displacement. 39 commenters suggested limiting rent increase for Senior projects the lesser of 30% of the annual SSI COLA or 3% to address the issue of annual rent increases increasing at a higher rate than SSI. One of the commenters proposed language in a new paragraph (D) to carry out the limit for Senior projects. In addition, the commenter recommended creating a process for tenants to provide input on the waiver application and outlined that process.

One commenter recommended that any decrease in a tenant's utility allowance from CUAC conversion not exceed $10-$15 per month over any 12-month period, with the overall related rent increase being subject to the proposed annual rent increase limitation in Section 10336(a). Two commenters recommended that rent increase limits be amended to exempt increases to net rents due to changes in the applicable utility allowance deductions from gross rents. One commenter encouraged CTCAC to remove the rent increase limitation.

Five commenters recommended that the exception in Section 10336(a)(1) relating to the increase to 30% on HUD/voucher units align with HUD's language of "up to 40% of their monthly adjusted income when they first move into a unit or sign an assisted lease" and applies when the gross rent for the unit is higher than the applicable payment standard. One commenter recommended language be added that explicitly allows vacant units to be moved to the maximum allowable rent upon turnover. A few commenters suggested removing the exceptions in Sections 10336(a)(1)(A)-(C) given the waiver process. Some commenters also recommended tenant participation in the waiver process and the tracking of waiver process.

One commenter proposed to add language and provisions to Section 10336(b) to cap security deposits at the lesser of the Fair Market/Payment Standard or allowable CTCAC rent level, ensuring fairer costs for tenants. One commenter recommended removing the qualification that these policies are only required for projects with Low-income Units and change the language of subdivision (b) to "All projects shall…" In addition to requiring compliance with the Fair Housing and nondiscrimination Laws and the Accessibility requirements, the compliance obligation should also comply with Housing First. The commenter also recommended adding, "individuals having a record of membership in a protected class" to the policy in Section 10336(b)(2)(A). This phrase was omitted from Section 7314(a) of the MHP Guidelines, but it should be included for full compliance with state and federal fair housing laws.

One commenter suggested more detail be added to Section 10336(b)(2)(B). While generally supportive of Coordinated Entry Systems (CES) and their advancement of fair housing opportunities, two commenters believed the requirement in Section 10336(b)(2)(B)(ii) that all units be filled through a CES is redundant and is an unnecessary burden on CTCAC as well as applicants, especially considering a similar requirement is present in most other funding sources for this population. Two commenters had concerns with the overlay of additional local CES requirements and recommended the language be removed. One commenter suggested subdivision (B) be split into two different parts: one about tenant selection generally and one about prioritization of Accessible Housing Units. With respect to tenant selection generally, the commenter recommended stating that owners must comply with "Fair Housing Laws" in addition to comments on how to further refine the regulations based on practice in other states.

One commenter supported the response to requests to create more flexibility with the CES, though recommended that alternative referrals still be subject to local review to ensure they meet eligibility requirements. The commenter suggested to add language to Section 10336(b)(2)(B)(ii)(a). Three commenters supported the proposed language to use CES referrals to fill vacancies for homeless units. Four commenters supported the proposed language to provide flexibility to fill vacant units by non-CES referral sources if the CES system does not refer a tenant within 30 days. One commenter had concerns with the 30-day requirement without any guardrails could lead to the proliferation of referral processes outside of CES and suggested changing the 30 days to 60 days and that the sponsors be required to provide proof that the CES system did not make a referral within the 60-day timeline to ensure that Sponsors comply with this requirement. One commenter shared concern with CTCAC's reliance on CES to fill vacancies because of the systemwide access barriers that CES presents to the disability community to housing access when reliance on CES is not required by law.

One commenter supported the proposed change in Section 10336(b)(2)(E) but suggested additional language that adverse factors related to domestic or sexual violence, such as negative tenancy references, bad credit or criminal history cannot serve as a basis for denying a survivor housing. The commenter also suggested additional language that reflects the other requirements contained in Violence Against Women Act (VAWA).

Two commenters had concerns with the proposed language in Section 10336(b)(2)(G). Given that properties that receive funding from HCD and CalHFA already have grievance polices in place, the commenter recommended that CTCAC establish its own grievance policy for properties not already subject to another regulator's grievance policy requirements. The commenter further requested that CTCAC provide property owners with a template if a property is not already subject to a grievance policy under a different federal, state, or local program. The commenter also recommended CTCAC allow at least one year for implementation. One commenter suggested more detail be added to Section 10336(b)(2)(G) specific to the rights of the tenant and should state that engaging in the grievance process is a condition precedent to the owner filing an unlawful detainer or other legal action to regain possession of a unit. One commenter stated that it would be helpful if grievance procedures be provided to all tenants and incorporated into tenant leases, and that the grievance procedures include enumerated elements of due process: adequate notice, right of representation, the opportunity to refute evidence and present defenses, and a decision on the merits. The commenter suggested CTCAC create its own policies and procedures for landlords to adopt, rather than allowing each landlord to make their own.

One commenter stated requiring the provision of interpretative services for LEP tenants in Section 10336(b)(2)(H) is an unnecessary burden to property owners/managers to translate all documents. Three commenters recommended that CTCAC provide the documents required to be translated in multiple languages and establish a threshold for CTCAC to create a LEP as HUD does (25% or more of the tenant population speaks one specific language).

One commenter expressed concerns that having a grievance policy established this early in the development process may be infeasible and encouraged CTCAC to give further consideration to how these requirements should fit within a project's overall timeline. Another commenter had concerns with an additional layer of requirement for tenant grievance policies as it is already included in the management plans and is already required for properties that receive funding from HCD and CalHFA.

Response to comments: Staff appreciates the comments received in Section 10336. As a reminder, the rent limit increase and exceptions were adopted on April 3, 2024. The section was simply moved from Section 10328 to the newly proposed Section 10336 with no additional changes. In response to the comments received relating to the rent increase limit, staff will consider them for future rulemaking and will monitor the impact of that change.

As stated above, most comments generally supported the proposed changes in Section 10336 some with additional comments on how to further refine the regulations relating Section 10336(b), including but not limited to, the requirement to adopt a written tenant policy, CES referral requirements, and tenant grievance and appeal procedure. Staff will evaluate and monitor impact of the proposed changes and review those comments for consideration for future rulemaking.

Staff agreed with some of the comments received in Section 10336 and have made revisions that have been incorporated in the final proposed change below.

Final proposed change: Proceed as initially proposed except as noted below

Section 10336. Laws, Rules, Guidelines, and Regulations for Tenants of Low-Income Units.

(a) Rent Increase Limit.

(1) Gross rents for a low-income household shall not increase in any 12-month period more than the lesser of five percent plus the percentage increase in the cost of living as defined in paragraph (3) of subdivision (g) of Section 1947.12 of the Civil Code or ten percent of the lowest rental rate charged for that household at any time during the 12 months prior to the effective date of the increase, except as follows:

(A) to increase the rent up to 30 percent of the monthly income of the household occupying the unit.

(B) for projects with terminated project-based rental assistance or operating subsidy as described in Section 10337(a)(3)(B); or

(C) a transfer of a household to another unit in the same property that has a different bedroom count or transfer to a higher AMI designation, as required by a public regulatory agreement or deed restriction, due to a change in the household's income or occupancy from initial qualification

(2) The Executive Director may grant a waiver to exceed the limit prescribed in subdivision (a)(1) if the waiver is consistent with the CTCAC Rent Increase Limit Waiver Memorandum, available on the CTCAC website and incorporated herein by reference, and the owner shows that the proposed rent increase is necessary to ensure financial stability or fiscal integrity of the property and does not unreasonably impact the tenants. A waiver denial is subject to the appeals process in Section 10330.

(3) In the notice required to be provided to tenants under Civil Code section 827, owners shall provide sufficient information explaining why the rent increase does not exceed programmatic maximum rents and the requirements of subdivision (a)(1) or (a)(2), if applicable. The explanation shall be in plain and accessible language and include the name, telephone number, and email address for a representative who can answer the tenant's questions about the rent increase.

(4) On or before June 30, 2026, and annually thereafter, the Executive Director shall assess the limit established pursuant to subdivision (a) and may make a recommendation to the Committee to adjust the limit based on the assessment.

(5) The requirements of this subdivision shall apply to all properties subject to a CTCAC regulatory agreement except that the requirements of this subdivision shall apply to properties that received an allocation of tax credits prior to April 3, 2024, starting January 1, 2025.

(6) Failure to comply with the provisions of this subdivision may result in the assessment of negative points under Section 10325(c)(2)(R) and fines under Section 10337(f)

(b) All ~~P~~projects ~~containing Low-Income Units~~ shall adopt the following policies and procedures in furtherance of the Fair Housing Laws and Housing and Accessibility Requirements in compliance with Section 10322(h)(1)(F) and submit them to CTCAC upon request:

(1) To the furthest extent applicable and subject to federal preemption, owners, property managers, and service providers must comply with all relevant laws, including, without limitation, the Fair Housing Laws, ~~and~~ the Housing and Accessibility Requirements, and Housing First.

(2) The owners, property managers, and service providers, as applicable, must do the following:

(A) Adopt a written nondiscrimination policy requiring that no person shall, on the grounds of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, age, medical condition, genetic information, citizenship, primary language, immigration status (except where explicitly prohibited by federal law), criminal history, arbitrary characteristics, and all other classes of individuals protected from discrimination under federal or state Fair Housing Laws, individuals perceived to be a member of any protected class, individuals having a record of membership in a protected class, or any individual or person associated with any protected class be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity benefiting in whole or in part from Tax Credits.

(B) Adopt a written tenant selection policy in clear, intelligible, and unambiguous language that complies with state and federal law, include the Fair Housing Laws, and is consistent with any Housing Type requirements, including Housing First.

(i) All new and existing projects with Accessible Housing Units shall adopt a process to market information about Accessible Housing Units to eligible individuals with disabilities and take reasonable nondiscriminatory steps to maximize use of Accessible Units by eligible individuals with disabilities requiring accessibility features. When an Accessible Housing Unit becomes vacant, the owner or property manager shall offer the unit:

(a) First, to a current occupant of another unit of the same project, or comparable projects under common control, having a disability requiring the accessibility features of the vacant unit and occupying a unit not having such features, or if no such occupant exists, then

(b) Second, to an eligible qualified applicant on the waiting list having a disability requiring the accessibility features of the vacant unit.

(c) If no applicant meeting the criteria in subsections (a) or (b) is available, the Accessible Housing Unit may be offered to a tenant or applicant who does not need the unit's accessibility features.

(d) When offering an Accessible Housing Unit to an applicant not having a disability requiring the accessibility features of the unit, the owner or manager shall require the applicant to agree to move to a non-accessible unit when a comparable unit is available. This agreement shall be incorporated in the lease or a lease addendum.

(ii) To the extent possible, projects where one or more of the Low-Income Units is restricted to occupancy by Chronically Homeless or Homeless must fill vacancies for such units with local CES referrals of people experiencing Homelessness or At-Risk of Homelessness. Where the CES system is not operational, referrals shall be through another similar system compliant consistent with WIC Section 8255, subdivision (b)(3).

(a) If the local CES system fails to refer a tenant within 30 days of written notification of a vacancy, units may be occupied by tenants referred from other sources consistent with WIC Section 8255, subdivision (b)(3).

(b) Where the local office of the U.S. Department of Veterans Affairs is not participating in a CES, vacancies may be filled with those Veterans who are referred directly by that local office.

(c) If acuity (the severity of presenting issues) is used as the basis for selecting tenants, it must be measured using the VI-SPDAT or some other standardized assessment tool approved by the Executive Director.

(C) Adopt and implement a written policy for providing~~responding to requests for~~ reasonable accommodations, reasonable modifications, and auxiliary aids and services for effective communication with residents and applicants with disabilities. All project owners must provide ~~adequate and visible~~ notice in plain language and accessible formats to tenants in units with adaptable features of their ability to request conversion of the adaptable features to make their unit more accessible.

(D) Develop and implement an affirmative fair housing marketing plan consistent with HUD's equal opportunity regulations at 24 CFR part 200, subpart M.

(E) Where applicable, ensure individuals are not denied assistance, evicted, or have their assistance terminated because of their status as survivors of domestic violence, dating violence, sexual assault, or stalking, or for being affiliated with a victim, pursuant to 34 USC Section 12491. Owners and managers have an obligation to inform such prospective and existing tenants of the rights and protections available to them under federal law by providing them with a Notice of Occupancy Rights Form HUD-5380 and VAWA Self-Certification Form HUD-5382. Notice must be given at the time an applicant is denied housing, at the time an applicant is admitted to housing, or when a tenant is notified of eviction or termination. Owners and managers are also required to comply with additional protections afforded to survivors under state law pursuant to Civil Code Section 1946.7 (early lease termination without penalty) and Civil Code Sections 1941.5 and 1941.6.

(F) ~~Authorize~~Adopt a policy allowing service animals as of right, reasonable accommodations for assistance animals under FEHA, and tenants to own or otherwise maintain one or more common household pets pursuant to the Pet Friendly Housing Act of 2017. (HSC~~ealth & Saf. Code,~~ § 50466).

(G) Unless required by another federal, state, or local program, ~~A~~adopt a tenant grievance and appeal procedure to resolve grievance filed by tenants and appeals of adverse actions taken by owners or managers regarding tenant occupancy of a Low-Income Unit, and prospective tenants' applications for occupancy.

(i) The grievance and appeal procedure shall be subject to CTCAC review upon request and, at a minimum, shall include:

(a) A requirement for the delivery to each tenant and applicant of a written copy of the appeal and grievance procedure;

(b) Procedures for informal dispute resolution;

(c) A right to a hearing before an impartial body, which shall consist of one or more persons with the power to render a final decision on the appeal or grievance; and

(d) Procedures for the conduct of an appeal or grievance hearing and the appointment of an impartial body.

(ii) Neither use of, nor participation in any of the appeal and grievance procedures shall constitute a waiver of or affect the rights of the tenant, prospective tenant, or Owner to a trial de novo or judicial review in any judicial proceeding which may thereafter be brought in the matter or the rights to file a judicial or administrative complaint under applicable Fair Housing Laws.

(H) Provide meaningful language access to Limited English Proficiency (LEP) tenants that, at a minimum, includes a written language access plan providing for the translation of notices concerning tenants' rights and the provision of interpretive services to facilitate communication between LEP tenants and Owners.

Note: Authority cited: Section 50199.17 and 50199.25, Health and Safety Code.
Reference: Sections 827 and 1947.12, Civil Code; Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

EXHIBIT A

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE REGULATIONS IMPLEMENTING THE FEDERAL AND STATE LOW INCOME HOUSING TAX CREDIT LAWS

CALIFORNIA CODE OF REGULATIONS
TITLE 4, DIVISION 17, CHAPTER 1

~~April 3~~December 11, 2024

Section 10300. Purpose and Scope.

These regulations establish procedures for the reservation, allocation and compliance monitoring of the Federal and State Low-Income Housing Tax Credit Programs (“Housing Tax Credit Programs”, “Programs”, or individually, “Federal Program” or “State Program”) and establish policies and procedures for use of the Tax Credits to meet the purposes contained in Section 252 of Public Law No. 99-514 (October 22, 1986), known as the Federal Tax Reform Act of 1986, as amended, and Chapter 658, California Statutes of 1987, as amended, and Chapter 1138, California Statutes of 1987, as amended.

Internal Revenue Code ("IRC") Section 42 provides for state administration of the Federal Program. California Health and Safety (H & S) Code Sections 50199.4 through 50199.22, and California Revenue and Taxation (R & T) Code Sections 12205, 12206, 17057.5, 17058, 23610.4 and 23610.5 establish the California State Program and designate the California Tax Credit Allocation Committee ("CTCAC") as the Housing Credit Agency to administer both the Federal and State Housing Tax Credit programs in California. These regulations set forth the policies and procedures governing the Committee's management of the Programs. In addition to these regulations, program participants shall comply with the rules applicable to the Federal Program as set forth in Section 42 and other applicable sections of the Internal Revenue Code. In the event that Congress, the California Legislature, or the IRS add or change any statutory or regulatory requirements concerning the use or management of the Programs, participants shall comply with such requirements.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10302. Definitions.

(a) Accessible Housing Unit(s). Includes "Housing Units with Mobility Features" and "Housing Units with Hearing/Vision Features."

~~(a)~~(b) Adaptive ~~r~~Reuse. Adaptive ~~r~~Reuse means retrofitting and repurposing of existing buildings that create new residential rental units, and expressly excludes any project that involves rehabilitation of any construction affecting existing residential units. Adaptive ~~r~~Reuse may include retrofitting and repurposing of existing hotels or motels if the hotel or motel is not currently a place of residence for the occupants, and/or sites that received a Project Homekey allocation.

~~(b)~~(c) AHP. The Affordable Housing Program of the Federal Home Loan Bank.

~~(c)~~(d) Allocation. The certification by the Committee of the amount of Federal, or Federal and State, Credits awarded to the applicant for purposes of income tax reporting to the IRS and/or the California Franchise Tax Board ("FTB").

(e) Alternative Accessibility Standards or "HUD Deeming Memo," HUD-2014-0042-001. The Alternative accessibility standard for accessibility in the U.S. Department of Housing and Urban Development's (HUD) notice at 70 Fed. Reg. 29,671 (May 23, 2014,) when used in conjunction with the requirements of 24 Code of Federal Regulations (C.F.R.) part 8 and 28 CFR part 35, including the 2010 Standards for Accessible Design (2010 ADAS) (28 C.F.R. part 35.104), available at https://www.ada.gov/law-and-regs/design-standards/2010-stds/.

~~(d)~~(f) Applicable Credit Percentage. The monthly rate, published in IRS revenue rulings pursuant to IRC Section 42(b)(1), applicable to the Federal Program for purposes of calculating annual Tax Credit amounts.

(g) Area Median Income or AMI. HUD developed income limits based on median family income estimates and fair market rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan area, published annually on the CTCAC website.

(h) At-Risk of Homelessness. The condition experienced by people defined as "at risk of homelessness" in 24 CFR Section 91.5 or 578.3.

~~(e)~~(i) Bath or bathroom. A bath or bathroom must be equipped with an exhaust fan, a toilet, a sink, a shower or bathtub, and a receptacle outlet.

~~(f)~~(j) Bedroom. A bedroom be at least 70 square feet, must include an interior door, a closet or free-standing wardrobe provided by the project owner, and at least one receptacle outlet.

~~(g)~~(k)Capital Needs Assessment or CNA. The physical needs assessment report required for all rehabilitation projects, described in Section 10322(h)(26)(B).

(l) CDLAC. The California Debt Limit Allocation Committee or its successor.

(m) Certified Access Specialist or CASp. Any individual currently holding a valid certification of certified access specialist pursuant to subchapter 2.5 of title 21 of the California Code of Regulations (C.C.R.).

~~(h)~~(n)Chairperson. The Chairperson of the California Tax Credit Allocation Committee.

(o) Chronic Homelessness or Chronically Homeless. The condition experienced by people defined as “chronically homeless” in 24 CFR Sections 91.5 or 578.3 and includes individuals and families:

(1) Residing in a place not meant for human habitation, emergency shelter, or safe haven, after experiencing Chronic Homelessness and subsequently residing in a Low-Income Unit within the last year;

(2) Residing in transitional housing after experiencing Chronic Homelessness; or

(3) Residing in an existing Low-Income Unit being rehabilitated with financial assistance from a state housing agency or being replaced by a project receiving financial assistance from a state housing agency provided that upon occupancy, the individual or family was experiencing Chronic Homelessness.

~~(i)~~(p) Committee. The California Tax Credit Allocation Committee (“CTCAC”) or its successor.

~~(j)~~(q) Community Foundation. A local foundation organized as a public charity under section 509(a)(1) of the Internal Revenue Code.

~~(k)~~(r) Compliance Period. That period defined by IRC Section 42(i)(1) and modified by R & T Code Section 12206(h), and further modified by the provisions of these regulations.

~~(l)~~(s) Credit(s). Housing Tax Credit(s), or Tax Credit(s).

~~(m)~~(t)Credit Ceiling. The amount specified in IRC Section 42(h)(3)(C) for Federal Program purposes (including the unused credits from the preceding calendar year, the current year’s population based credits, returned credits and national pool credits), and in R & T Code Section 17058(g) for State Program purposes.

~~(n)~~(u) CTCAC. California Tax Credit Allocation Committee.

~~(o)~~(v) Developer Fee. All Funds paid at any time as compensation for developing the proposed project, to include all processing agent fees, developer overhead and profit, construction management oversight fees if provided by the developer, personal guarantee fees, syndicator consulting fees, and reserves in excess of those customarily required by multi-family housing lenders.

~~(p)~~(w) Development Team. The group of professionals identified by the applicant to carry out the development of a Tax Credit project, as identified in the application pursuant to subsection 10322(h)(5).

(x) Disability. Has the same meaning as "disability" in the Americans with Disabilities Act (ADA) at 42 United States Code (U.S.C.) section 12102 or the California Fair Employment and Housing Act (FEHA) at Government Code (Gov. Code) section 12926 and C.C.R., title 2, section 14020.

~~(q)~~(y) Eligible Project. A proposed 9% Tax Credit project that has met all of the Basic Threshold Requirements and Additional Threshold Requirements described in Sections 10325(f) and (g) below.

~~(r)~~(z) Executive Director. The executive director of the California Tax Credit Allocation Committee.

(aa) Fair Housing Law(s). Including the California FEHA (Gov. Code, § 12900 et seq.); 2 C.C.R. § 12005 et seq.); the Unruh Civil Rights Act (Unruh Act) (Civ. Code, § 51 et seq.); Gov. Code section 11135 and 2 C.C.R. § 14000 et seq. (the prohibition of discrimination in state-funded programs); Gov. Code section 8899.50 (the duty to affirmatively further fair housing); California's Housing Element Law (Gov. Code, § 65583 et seq.); the Disabled Person Act (Civ. Code § 5, et seq.), Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.); the Americans with Disabilities Act of 1990 (ADA) (42 U.S.C. § 12101 et seq.); the Fair Housing Act (FHA) and amendments (42 U.S.C. § 3601 et seq.); the Fair Housing Amendments Act of 1988; Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); the Architectural Barriers Act of 1968 (42 U.S.C. § 4151 et seq.); the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101 – 6107); and all federal and state regulations implementing these laws.

(bb) Farmworker. An individual who derives, or prior to retirement or disability derived, a substantial portion of their income as an agricultural employee as defined in subdivision (b) of Section 1140.4 of the Labor Code.

~~(s)~~(cc) Farmworker Housing. A development of permanent housing ~~for agricultural workers (as defined by California Labor Code Section 1140.4(b))~~ in which at least 50 percent of the units are available to, and occupied by, farmworkers and their households. The Committee may permit an owner to temporarily house non farmworkers in vacant units in the event of a disaster or other critical occurrence. However, such emergency shelter shall only be permitted if there are no pending qualified farmworker household applications for residency.

~~(t)~~(dd) Federally Subsidized. As defined by IRC Section 42(i)(2).

~~(u)~~(ee) Federal Credit. The Tax Credit for low-income rental housing provided under IRC Section 42 and implemented in California by the Committee.

~~(v)~~(ff) Financial Feasibility. As required by, IRC Section 42(m)(2), and further defined by these regulations in Section 10327.

~~(w)~~(gg) FTB. State of California Franchise Tax Board.

(hh) Gross Rent. Gross rent has the same meaning as “gross rent” in 26 U.S.C. section 42, subdivision (g)(2).

~~(x)~~(ii) Hard construction costs. The amount of the construction contract, excluding contractor profit, general requirements and contractor overhead.

~~(y)~~(jj) High-Rise Project(s). A project which applies for a Credit reservation pursuant to Section 10325 in which 100 percent (100%) of the residential units are Tax Credit Units and for which the project architect has certified concurrently with the submission of an application to the Committee that (1) one or more of the buildings in the project would have at least six stories; and (2) the construction period for the project is reasonably expected to be in excess of 18 months.

~~(z)~~(kk) Homeless or Homelessness~~. As defined by Section 10315(b)(1) through (4)~~. The condition of individuals or households who meet the definition of “homeless” in HUD regulation, 24 CFR parts 91.5 or 578.3 and includes:

(1) Individuals or families subject to a Continuum of Care (CoC) emergency transfer plan;

(2) Individuals or families receiving or who received Supportive Services or rental subsidies administered by a CoC or other program(s) for people experiencing homelessness, including a public housing authority's shelter plus care program or SRO Moderate Rehabilitation Program; and

(3) Individuals or families of a development undergoing rehabilitation with Tax Credits, or being replaced by a Tax Credit-funded property, shall be deemed to qualify under this definition if they qualified upon initial occupancy.

(4) Individuals defined as Chronically Homeless herein.

(5) People at-risk of homelessness referred to fill a Low-Income Unit vacancy through a local CES consistent with Section 10336(b)(2)(B)(ii).

(ll) Housing and Accessibility Requirements. Include California Building Code (CBC) Chapters 11 A and B; the Fair Housing Act (FHA) (42 U.S.C. § 3601 et seq.; 24 C.F.R. part 100) the ANSI A117.11986 design and construction standard incorporated by reference at 24 C.F.R. part 100.201a; the ADA (42 U.S.C. § 12101 et seq.; 28 C.F.R. part 35 (Title 11) and part 36 (Title III)) the Uniform Federal Accessibility Standards (UFAS) at 24 C.F.R. 40, or, in the alternative, the Alternative Accessibility Standards (as defined in (e)) when used with the 2010 ADAS and CBC 11 B; the Department of Agriculture Regulations for Rural Housing Programs (7 CFR 15b); and all federal and state regulations implementing these laws.

(mm) Housing First. Has the same definition as “Housing First” in Welfare and Institutions (WIC) Code section 8255.

(nn) Housing Unit with Mobility Features. A housing unit located on an accessible route and compliant with 24 C.F.R. part 8.22, CBC Ch. 11B, Division 4 and Sections 809.2 through 809.4, and all applicable provisions of UFAS or comparable provisions of the Alternative Accessibility Standard, including but not limited to Sections 809.2 through 809.4 of the 2010 ADAS. A Housing Unit with Mobility Features can be approached, entered, and used by persons with mobility disabilities, including individuals who use wheelchairs.

(oo) Housing Unit with Hearing/Vision Features. A housing unit compliant with 24 C.F.R. part 8.22, CBC Ch. 11B, including Section 809.5, and all applicable provisions of UFAS or comparable provisions of the Alternative Accessibility Standard, including but not limited to Section 809.5 of the 2010 ADAS.

~~(aa)~~(pp) Hybrid project or development. A new construction development constructed with separate 9% and 4% Federal Credit Allocations. The development must meet the conditions set forth in Section 10325(c)(9)(A).

~~(bb)~~(qq) IRS. United States Internal Revenue Service.

~~(cc)~~(rr) Local Development Impact Fees. The amount of impact fees, mitigation fees, or capital facilities fees imposed by municipalities, county agencies, or other jurisdictions such as public utility districts, school districts, water agencies, resource conservation districts, etc.

~~(dd)~~(ss) Local Reviewing Agency. An agency designated by the local government having jurisdiction that will perform evaluations of proposed projects in its locale according to criteria set forth by the Committee.

~~(ee)~~(tt) Low-Income Unit. As defined by IRC Section 42(i)(3).

~~(ff)~~(uu) Market-Rate Unit. A unit other than a Tax Credit Unit as defined by these regulations.

~~(gg)~~(vv) Multifamily Housing Program or MHP. Multifamily Housing Program of California's Department of Housing and Community Development (HCD).

~~(hh)~~(ww) "Net Project Equity" shall mean the total sale or refinancing proceeds resulting from a Transfer Event less the payment of all obligations and liabilities of the owner, including any secured and unsecured related and third-party debt thereof (including, without limitation, repayment of deferred developer fees and repayment of any advances made by a partner to fund operating and/or development deficits).

~~(ii)~~(xx) Net Tax Credit Factor. The estimated or actual equity amount raised or to be raised from a tax credit syndication or other instrument, not including syndication related expenses, divided by the total amount of Federal and State Tax Credits reserved or allocated to a project. The calculation must include the full ten-year amount of Federal Tax Credits and the total amount of State Tax Credits.

(yy) Older Adults in Need of Supportive Services. Individuals aged 55 or older who need Supportive Services to maintain and stabilize their housing.

~~(jj)~~(zz) Qualified Allocation Plan or QAP. The "Low Income Housing Tax Credit Program Qualified Allocation Plan," as adopted in regulation Sections 10300 et. seq., and in accordance with the standards and procedures of IRC Section 42(m)(1)(B).

~~(kk)~~(aaa) ~~"~~Qualified CNA~~apital Needs Assessment"~~. A~~shall mean a capital needs assessment~~CNA for a property subject to a Transfer Event dated within one hundred eighty (180) days of the proposed Transfer Event which (i) meets the requirements of (a) the Fannie Mae Multifamily Instructions for the PNA Property Evaluator, (b) Freddie Mac's Property Condition Report requirements in Chapter 14 of the Small Balance Loan Addendum, (c) HUD's Multifamily ~~Capital Needs Assessment~~CNA section in Appendix 5G of the Multifamily Accelerated Process Guide, or (d) Standard Guide for Property Condition Assessments: Baseline Property Condition Assessment Process (ASTM Designation E 2018-08) utilizing a recognized industry standard to establish useful life estimates for the replacement reserve analysis, and (ii) clearly sets forth (a) the capital needs of the project for the next three (3) years (the "Short-Term Work") and the projected costs thereof, and (b) the capital needs of the project for the subsequent twelve (12) years (the "Long Term Work") and the projected contributions to reserves that will be needed to accomplish that work.

~~(ll)~~(bbb) Qualified Nonprofit Organization. An organization that meets the requirements of IRC Section 42(h)(5), whose exempt purposes include the development of low-income housing as described in IRC Section 42, and which, if a State Tax Credit is requested, also qualifies under H & S Code Section 50091.

~~(mm)~~(ccc) RHS. United States Rural Housing Service, formerly Rural Housing and Community Development Service or RHCDS, formerly Farmers Home Administration or FmHA

~~(nn)~~(ddd) Related Party.

(1) the sibling(s)~~brothers, sisters~~, spouse, ancestors, and direct descendants of a person;

(2) a person and corporation where that person owns more than 50% in value of the outstanding stock of that corporation;

(3) two or more corporations, general partnership(s), limited partnership(s) or limited liability corporations connected through debt or equity ownership, in which

(A) stock is held by the same persons or entities for
(i) at least 50% of the total combined voting power of all classes that can vote, or
(ii) at least 50% of the total value of shares of all classes of stock of each of the corporations or
(iii) at least 50% of the total value of shares of all classes of stock of at least one of the other corporations, excluding, in computing that voting power or value, stock owned directly by that other corporation;

(B) concurrent ownership by a parent or related entity, regardless of the percentage of ownership, or a separate entity from which income is derived;

(C) concurrent ownership by a parent or related entity, regardless of the percentage of ownership, or a separate entity where a sale-leaseback transaction provides the parent or related entity with income from the property leased or that creates an undue influence on the separate entity as a result of the sale-leaseback transaction;

(D) concurrent ownership by a parent or related entity, regardless of the percentage of ownership, of a separate entity where an interlocking directorate exists between the parent or related entity and the separate entity.

(4) a grantor and fiduciary of any trust;

(5) a fiduciary of one trust and a fiduciary of another trust, if the same person is a grantor of both trusts;

(6) a fiduciary of a trust and a beneficiary of that trust;

(7) a fiduciary of a trust and a corporation where more than 50% in value of the outstanding stock is owned by or for the trust or by or for a person who is a grantor of the trust;

(8) a person or organization and an organization that is tax-exempt under Subsection 501(c)(3) or (4) of the IRC and that is affiliated with or controlled by that person or the person's family members or by that organization;

(9) a corporation and a partnership or joint venture if the same persons own more than:

(A) 50% in value of the outstanding stock of the corporation; and

(B) 50% of the capital interest, or the profits' interest, in the partnership or joint venture;

(10) one S corporation or limited liability corporation and another S corporation or limited liability corporation if the same persons own more than 50% in value of the outstanding stock of each corporation;

(11) an S corporation or limited liability corporation and a C corporation, if the same persons own more than 50% in value of the outstanding stock of each corporation;

(12) a partnership and a person or organization owning more than 50% of the capital interest, or the profits' interest, in that partnership; or

(13) two partnerships where the same person or organization owns more than 50% of the capital interests or profits' interests.

The constructive ownership provisions of IRC Section 267 also apply to subsections 1 through 13 above. The more stringent of regulations shall apply as to the ownership provisions of this section.

(eee) Reservation. As provided for in Health & Safety Code Section 50199.10(e) the initial award of Tax Credits to an Eligible project. Reservations may be conditional.
~~(oo)~~

~~(pp)~~(fff) Resyndication.~~:~~ A project subject to an existing tax credit regulatory agreement that is awarded a new allocation of tax credits to preserve and extend the affordability of the project.

~~(qq)~~(ggg) Rural. An area defined in H & S Code Section 50199.21.

~~(rr)~~(hhh) Scattered Site Project. A project in which the parcels of land are not contiguous except for the interposition of a road, street, stream or similar interposition.

(1) For acquisition and/or rehabilitation projects with one pre-existing project-based Section 8 contract in effect for all the sites, there shall be no limit on the number or proximity of sites.

(2) For acquisition and/or rehabilitation projects with any of the following: (A) existing federal or state rental assistance or operating subsidies, (B) an existing CTCAC Regulatory Agreement, or (C) an existing regulatory agreement with a federal, state, or local public entity, the number of sites shall be limited to five, unless the Executive Director approves a higher number, and all sites shall be either within the boundaries of the same city, within a 10-mile diameter circle in the same county, or within the same county if no location is within a city having a population of five-hundred thousand (500,000) or more.

(3) For new construction projects and all other acquisition and/or rehabilitation projects, the number of sites shall be limited to five, and all sites shall be within a 1-mile diameter circle within the same county.

~~(ss)~~(iii) Single Room Occupancy (SRO)/Studio: A unit that may or may not include a complete private bath and kitchen but generally does not have a separate bedroom. A complete private bath consists of a toilet and shower, with a vanity sink that may or may not be in the same room. SRO units in projects with an existing regulatory agreement recorded with CTCAC or another government agency shall be deemed having met the requirements of an SRO/Studio. Projects containing units that do not have complete private baths shall provide at least one bath per eight units and at least one complete bath per floor. Common kitchen facilities shall be provided for units without complete kitchens. CTCAC uses SRO and Studio interchangeably but recognizes some jurisdictions may not, and the project shall comply with all local regulations.

(jjj) Special Needs. A housing type servicing Special Needs Population(s) and meeting the requirements of Section 10325, subdivision (g)(3).

(kkk) Special Needs Population(s). One or more of the following groups who need Supportive Services to maintain and stabilize their housing:

(1) People with Disabilities;

(2) At-Risk of Homelessness;

(3) Individuals with substance use disorders;

(4) Frequent users of public health or mental health services, as identified by a public health or mental health agency;

(5) Individuals who are fleeing domestic violence, sexual assault, and human trafficking;

(6) Individuals who are experiencing Homelessness or Chronic Homelessness;

(7) Homeless youth as defined in Government Code section 12957, subdivision (e)(2);

(8) Families meeting the definition of "Eligible family" under the Bringing Families Home program at WIC section 16523, who may or may not be participating in the program.

(9) Individuals exiting institutional settings or at risk of placement in an institutional setting;

(10) Older Adults in Need of Supportive Services; or

(11) Other specific groups with unique housing needs as determined by the Executive Director.

~~(tt)~~(lll) State Credit. The Tax Credit for low-income rental housing provided by the Revenue and Taxation Code Sections 12205, 12206, 17057.5, 17058, 23610.4 and 23610.5, including the State Farmworker Credit, formerly the Farmworker Housing Assistance Program provided by the Revenue and Taxation Code Sections 12206,17058, and 23610.5 and by the Health and Safety Code Sections 50199.2 and 50199.7.

(mmm) Supportive Services. Services that address the special needs of people served by a project necessary to assist people obtain and maintain housing. Such services shall be consistent with the definition of "Supportive Services" in subdivision (29) of section 11360 of title 42 of the United States Code, and may include social, health, educational, income support and employment services and benefits, coordination of community building and educational activities, individualized needs assessment, and individualized assistance with obtaining services and benefits.

~~(uu)~~(nnn) Tax Credit Units. Low-Income Units and manager units.

~~(vv)~~(ooo) Tax-Exempt Bond Project. A project that meets the definition provided in IRC Section 42(h)(4).

~~(ww)~~(ppp) Tax forms. Income tax forms for claiming Tax Credits: for Federal Tax Credits, IRS Form 8609; and, for State Tax Credits, FTB Form 3521A.

~~(xx)~~(qqq) "Transfer Event" shall mean (i) a transfer of the ownership of a project, (ii) the sale or assignment of a partnership interest in a project owner and/or (iii) the refinancing of secured debt on a project. The following shall not be deemed a Transfer Event: (i) the transfer of the project or a partnership or membership interest in a project owner in which reserves remain with the project and the debt encumbering the project is not increased, refinanced or otherwise modified, (ii) the refinancing of project debt which does not increase the outstanding principal balance of the debt other than in the amount of the closing costs and fees paid to the project lender and third parties as transaction costs, provided that reserves remain with the project, (iii) the replacement of a general partner by a limited partner upon the occurrence of a default by a general partner in accordance with partnership agreement of the project owner, (iv) a transfer pursuant to a foreclosure or deed in lieu of foreclosure to a non-related party, (v) a “Subsequent Transfer” pursuant to Section 10320(b)(4)(B) hereof, (vi) a transfer of the ownership of a project subject to an existing tax credit regulatory agreement with a remaining term of five (5) or less years if the transfer is made in connection with a new reservation of 9% or 4% tax credits, or (vii) the sale of a project, or the sale or assignment of a partnership interest in a project owner, to an unrelated party for which the parties entered into a purchase agreement prior to October 9, 2015. Notwithstanding the foregoing, the term “Transfer Event” shall be applicable only to projects in which at least 50% of the units are Tax Credit Units.

~~(yy)~~(rrr) Threshold Basis Limit. The aggregate limit on amounts of unadjusted eligible basis allowed by the Committee for purposes of calculating Tax Credit amounts. These limits are published by CTCAC on its website, by unit size and project location, and are based upon average development costs reported within CTCAC applications and certified development cost reports. CTCAC staff shall use new construction cost data from both 9 percent and 4 percent funded projects, and shall eliminate extreme outliers from the calculation of averages. Staff shall publicly disclose the standard deviation percentage used in establishing the limits, and shall provide a worksheet for applicant use. CTCAC staff shall establish the limits in a manner that seeks to avoid a precipitous reduction in the volume of 9 percent projects awarded credits from year to year.

~~(zz)~~(sss) Tribe. A federally recognized Indian tribe located in California, or an entity established by the tribe to undertake Indian housing projects, including projects funded with federal Low Income Housing Tax Credits.

~~(aaa)~~(ttt) Tribal Trust Land. Real property located within the State of California that meets both the following criteria:

(1) is trust land for which the United States holds title to the tract or interest in trust for the benefit of one or more tribes or individual Indians, or is restricted Indian land for which one or more tribes or individual Indians holds fee title to the tract or interest but can alienate or encumber it only with the approval of the United States.

(2) the land may be leased for housing development and residential purposes under Federal law.

~~(bbb)~~(uuu) Waiting List. A list of Eligible Projects approved by CTCAC following the last application cycle of any calendar year, pursuant to Section 10325(h) below.

~~(ccc)~~(vvv) CTCAC/HCD Opportunity Area Map. A map or series of maps approved annually by the Committee as the CTCAC/HCD Opportunity Area Map.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10305. General Provisions.

(a) Meetings. The Committee shall meet on the call of the Chairperson.

(b) Report. At each meeting of the Committee at which Tax Credit reservations from the Credit Ceiling are made, the Executive Director shall make a report to the Committee on the status of the Federal and State Tax Credits reserved and allocated.

(c) Forms. CTCAC shall develop such forms as are necessary to administer the programs and is authorized to request such additional information from applicants as is appropriate to further the purposes of the Programs. Failure to provide such additional information may cause an application to be disqualified or render a reservation null and void.

(d) Tax Credit Limitations. No applicant shall be eligible to receive Tax Credits if, together with the amount of Federal or State Tax Credits being requested, the applicant would have, in the capacity of individual owner, corporate shareholder, general partner, sponsor, or developer, received a reservation or allocation greater than fifteen percent (15%) of the total Federal Credit Ceiling for any calendar year, calculated as of February first of the calendar year.

(e) Notification. Upon receipt of an application, CTCAC shall notify the Chief Executive Officer (e g., city manager, county administrative officer, tribal chairperson) of the local jurisdiction within which the proposed project is located and provide such individual an opportunity to comment on the proposed project (IRC Section 42(m)(1)(ii)).

(f) Conflicting provisions. These regulations shall take precedence with respect to any and all conflicts with provisions of the QAP or other guidance provided by the Committee. This subsection shall not be construed to limit the effect of the QAP and other guidance in cases where said documents seek to fulfill, without conflict, the requirements of federal and state statutes pertaining to the Tax Credit Programs.

(g) The Committee may, at its sole discretion, reject an application if the proposed project fails to meet the minimum point requirements established by the Committee prior to that funding round. The Committee may establish a minimum point requirement for competitive rounds under either Section 10325 or 10326.

(h) Notwithstanding any other provision of these regulations, only projects receiving a tax-exempt bond allocation from CDLAC shall be eligible for State Tax Credits allocated pursuant to subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code and the applicant criteria shall be applied in accordance with Section 10326. Up to two hundred million dollars ($200,000,000) may be allocated for housing financed by CalHFA's Mixed-Income Program, and this amount may be reduced upon agreement of the Executive Directors of CalHFA and CTCAC.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10310. Reservations of Tax Credits.

(a) Reservation cycles. The Committee shall reserve Tax Credits on a regular basis in accordance with H. & S Code Section 50199.14(a), pursuant to these regulations and the QAP, incorporated by reference in full.

(b) Credit Ceiling available. The approximate amount of Tax Credits available in each reservation cycle may be established by the Committee at a public meeting designated for that purpose as of February first of the calendar year, in accordance with the following provisions:

(1) Amount of Federal Tax Credits. The amount of Federal Tax Credits available for reservation in a reservation cycle shall be equal to the sum of:

(A) the per capita amount authorized by law for the year, plus or minus the unused, Federal Credit Ceiling balance from the preceding calendar year, multiplied by a percentage amount established by the Committee for said cycle;

(B) the amount allocated, and available, under IRC Section 42(h)(3)(D) as of the date that is thirty days following the application deadline for said cycle;

(C) the amount of Federal Credit Ceiling returned, and available, as of the date that is thirty days following the application deadline for said cycle; and, additional amounts of Federal Credit Ceiling, from the current or subsequent year, necessary to fully fund projects pursuant to the allocation procedures set forth in these regulations.

For calendar year 2020, and 2021 if applicable, the amount of the Federal Credit Ceiling established by the Further Consolidated Appropriations Act, 2020 ("FCAA") shall be allocated pursuant to Section 10325(d)(1). For calendar year 2021, and 2022 if applicable, the amount of the Federal Credit Ceiling established by the Consolidated Appropriations Act, 2021 ("CAA") shall be allocated pursuant to Section 10325(d)(1).

(2) Amount of State Tax Credits. The amount of State Tax Credits available for reservation in a reservation cycle shall be equal to:

(A) the amount authorized by law for the year, less any amount set-aside for use with certain tax-exempt bond financed projects, plus the unused State Credit Ceiling balance from the preceding calendar year, multiplied by a percentage amount established by the Committee for said cycle;

(B) the amount of State Credit Ceiling returned, and available, by the date that is thirty days following the application deadline for said cycle; plus,

(C) additional amounts of State Credit Ceiling, from the current or subsequent year, necessary to fully fund projects pursuant to the allocation procedures set forth in these regulations and,

(D) five hundred thousand dollars ($500,000) per calendar year in State Farmworker Credits to provide Farmworker Housing, plus any returned and unused State Farmworker Credit balance from the preceding calendar year.

(3) Waiting List Tax Credits. Tax Credits returned (other than those returned pursuant to Section 10328(g), and Tax Credits allocated under IRC Section 42(h)(3)(D) during any calendar year, and not made available in a reservation cycle, shall be made available to applications on Committee Waiting Lists, pursuant to subsection 10325(h).

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10315. Set-asides and Apportionments.

CTCAC will accept applications from Qualified Nonprofit Organizations for the Nonprofit set-aside upon the request of the qualified applicant, regardless of the proposed housing type. Thereafter, CTCAC shall review each non-rural pending competitive application applying as an at-risk or special needs housing type under subsection (h) below, first, within that housing type's relevant set-aside. Non-rural applicants meeting the criteria for both the special needs and at-risk housing types pursuant to Section 10325(g) may request to be considered in both set-asides. Applicants receiving an award from either the At-Risk or Special Needs set-aside shall be considered as that housing type for purposes of paragraph (h).

(a) Nonprofit ~~s~~Set-~~a~~Aside. Ten percent (10%) of the Federal Credit Ceiling for any calendar year, calculated as of February first of the calendar year, shall be set-aside for projects involving, over the entire restricted use period, Qualified Nonprofit Organizations as the only general partners and developers, as defined by these regulations, and in accordance with IRC Section (42)(h)(5).

(b) Nonprofit Set-Aside Homeless Assistance Project Priority.

(1) ~~(b)~~ Each funding round, credits available in the Nonprofit set-aside shall be prioritized for qualified Homeless assistance ~~made available as a priority to~~ , meaning the greater of 15 Low-Income Units or twenty-five percent (25%) of the Low-Income Units within the project are designated for people experiencing Homelessness and the average targeted income for those units is no more than forty percent (40%) AMI,~~projects that meet the requirements below and provide housing to Homeless households at affordable rents, consistent with Section 10325(g)(3)~~ in the following priority order:

(A) ~~First priority will be given to q~~Qualified Homeless assistance projects with 1) McKinney-Vento Homeless Assistance Act, HCD Multifamily Housing Program (MHP), HCD Veterans Housing and Homeless Prevention Program (VHHP), HCD Homekey, Mental Health Services Act (MHSA), CalHFA Local Government Special Needs Housing Program, Governor's Homeless Initiative, Housing for a Healthy California, or HCD No Place Like Home development capital funding committed of~~for which the amount of development capital funding committed shall be~~ at least $500,000 or $10,000 per unit for all Low-Income Units in the project~~ (irrespective of the number of units assisted by the referenced programs)~~, whichever is greater; or 2) projects with rental or operating assistance funding commitments from federal, state, or local governments~~al funding sources~~ where~~.~~ ~~T~~the rental assistance is~~must be~~ sponsor-based or project-based and the remaining term of any~~the~~ project-based assistance contract is~~shall be~~ no less than one (1) year and ~~shall~~ applies~~y~~ to no less than fifty percent (50%) of the Low-Income Units in the proposed project. For local government funding sources, ongoing assistance may be in the form of a letter of intent from the governmental entity.

(B) Second priority will be given to other qualified Homeless assistance projects.

~~To compete as a Homeless assistance project, at least fifty percent (50%) of the Low-Income Units within the project must be designated for Homeless households as described in category (1) through (4) immediately below:~~

~~(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:~~
~~(A) Has a primary nighttime residence that is a public or private place not meant for human habitation;~~
~~(B) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or~~
~~(C) Is exiting an institution and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.~~

~~(2) Individual or family who will imminently lose their primary nighttime residence, provided that:~~
~~(A) Residence will be lost within 14 days of the date of application for homeless assistance;~~
~~(B) No subsequent residence has been identified; and~~
~~(C) The individual or family lacks the resources or support networks needed to obtain other permanent housing.~~

~~(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:~~
~~(A) Are defined as homeless under the other listed federal statutes;~~
~~(B) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;~~
~~(C) Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and~~

~~(D) Can be expected to continue in such status for an extended period of time due to special needs or barriers.~~

~~(4) Any individual or family who:~~
~~(A) Is fleeing, or is attempting to flee, domestic violence;~~
~~(B) Has no other residence; and~~
~~(C) Lacks the resources or support networks to obtain other permanent housing.~~

~~Individuals or families that are subject to a Continuum of Care emergency transfer plan, receiving or have received supportive services or rental subsidies administered by a Continuum of Care or other programs targeted to individuals experiencing homelessness, or through a public housing authority's shelter plus care program, or SRO Moderate Rehabilitation Program, or are otherwise transferring to a homeless unit shall be considered homeless or retain their original homeless or chronically homeless status for the purposes of the transfer. This subparagraph applies both to existing and future developments.~~

(2) For all projects receiving a reservation under (b)(1)(A) or (B)~~the first or second priority~~, owners, property managers, and service providers shall comply with the core components of Housing First and the tenant selection requirements of Section 10336(b)(2)(B)(ii)~~, as defined in Welfare and Institutions Code Section 8255(b), with respect to the units designated for homeless households. For projects receiving a reservation under the first or second priority, the applicant also shall commit to reserving vacant homeless assistance units for 60 days for occupancy by persons or households referred, where such systems or lists exist, by either 1) the relevant coordinated entry or access system, 2) the relevant county health department from a list of frequent health care users; or 3) the relevant behavioral health department from a list of persons with chronic behavioral health conditions who require supportive housing. The applicant shall enter into a memorandum of understanding with the relevant department or system administrator prior to placing in service unless a reasonable memorandum is refused by the department or administrator.~~

~~Any amount of Tax Credits not reserved for Homeless assistance projects during a reservation cycle shall be available for other applications qualified under the Non-profit set-aside.~~

(c) Rural set-aside. Twenty percent (20%) of the Federal Credit Ceiling for any calendar year, calculated as of February first of the calendar year, shall be set-aside for projects in rural areas as defined in H & S Code Section 50199.21 and as identified in supplemental application material prepared by CTCAC. For purposes of implementing Section 50199.21(a), an area is eligible under the Section 515 program on January 1 of the calendar year in question if it either resides on the Section 515 designated places list in effect the prior September 30, or is so designated in writing by the USDA Multifamily Housing Program Director. All Projects located in eligible census tracts defined by this Section must compete in the rural set-aside and will not be eligible to compete in other set-asides or in the geographic areas unless the Geographic Region in which they are located has had no other Eligible Projects for reservation within the current calendar year. In such cases the rural project may receive a reservation in the last round for the year, from the geographic region in which it is located, if any.

Within the rural set-aside competition, the first tiebreaker shall be applied as described in Section 10325(c)(9), except that the Seniors, Large Family New Construction in Highest or High Resource Tract, and Acquisition and/or Rehabilitation housing type goals established by Section 10315(h) shall be calculated relative to the rural set-aside dollars available each round, rather than against the total credits available statewide each round.

(1) RHS, HOME, and CDBG-DR program apportionment. In each reservation cycle, fourteen percent (14%) of the rural set-aside shall be available for new construction projects which have a funding commitment from RHS of at least $1,000,000 from either RHS's Section 514 Farm Labor Housing Loan Program, RHS's Section 515 Rural Rental Housing Loan Program, or a reservation from a Participating Jurisdiction or the State of California of at least $1,000,000 in HOME or CDBG-DR funding.

All projects meeting the RHS, HOME, and CDBG-DR program apportionment eligibility requirements shall compete under the RHS, HOME, and CDBG-DR program apportionment. Projects that are unsuccessful under the apportionment shall then compete within the general rural set-aside described in subsection (c). Any amount reserved under this subsection for which RHS, HOME, or CDBG-DR funding does not become available in the calendar year in which the reservation is made, or any amount of Credit apportioned by this subsection and not reserved during a reservation cycle shall be available for applications qualified under the Rural set-aside.

(2) Native American apportionment. In each reservation cycle starting in 2024 and each year thereafter, ten percent (10%) of the rural set-aside shall be available for applications proposing projects on land to be owned by a Tribe, whether the land is owned in fee or in trust, and in which occupancy will be legally limited to tribal households, except that up to 20% of Low-Income Units may serve non-tribal households if required by the HOME Program. Apportioned dollars shall be awarded to projects sponsored by Tribes using the scoring criteria in Section 10325(c), and achieving the minimum score established by CTCAC under Section 10305(h). In addition, the application shall receive the minimum points available for both general partner and management company experience under Section 10325(c)(1), except that the management company minimum scoring cannot be obtained through the point category for a housing tax credit certification examination.

(d) “At-Risk” set-aside. After accounting for the second supplemental set-aside described in (g), five percent (5%) of the Federal Credit Ceiling for any calendar year, calculated as of February first of the calendar year, shall be set aside for projects that qualify and apply as an “At risk” housing type pursuant to subsection (h) below. Any proposed project that applies and is eligible under the Nonprofit set-aside but is not awarded credits from that set-aside shall be eligible to be considered under this At-Risk set-aside if the project meets the housing type requirements in Section 10325(g)(4).

(e) Special Needs set-aside. After accounting for the second supplemental set-aside described in (g), four percent (4%) of the Federal Credit Ceiling for any calendar year, calculated as of February first of the calendar year, shall be set aside for projects that qualify and apply as ~~a~~ Special Needs ~~housing type project pursuant to subsection (h) below~~. Any proposed Special Needs project that applies and is eligible under the Nonprofit set-aside, but is not awarded credits from that set-aside, shall be eligible to be considered under this Special Needs set-aside ~~if the project meets the housing type requirements in Section 10325(g)(3)~~.

(f) First supplemental set-aside. After accounting for the second supplemental set-aside described in (g), an amount equal to three percent (3%) of the Federal Credit Ceiling for any calendar year, calculated as of February first of the calendar year, shall be held back to fund overages that occur in the second funding round set-asides and/or in the Geographic Apportionments because of funding projects in excess of the amounts available to those Set Asides or Geographic Apportionments, the funding of large projects, such as HOPE VI projects, or other Waiting List or priority projects. In addition to this initial funding, returned Tax Credits and unused Tax Credits from Set Asides and Geographic Apportionments will be added to this Supplemental Set Aside, and used to fund projects at year end so as to avoid loss of access to National Pool credits.

(g) Second supplemental set-aside. For each calendar year an amount of the Federal Credit Ceiling determined by the Executive Director, calculated as of February first of the calendar year, shall be held back to fund projects designated as DDA project pursuant to Section 10327(d)(3).

(h) Housing types. To be eligible for Tax Credits, all applicants must select and compete in only one of the categories listed below, exclusive of the Acquisition and/or Rehabilitation and Large Family New Construction located in a Highest or High Resource Area housing types which are listed here solely for purposes of the tiebreaker in Section 10325(c)(9), and must meet the applicable “additional threshold requirements” of Section 10325(g), in addition to the Basic Threshold Requirements in 10325(f). The Committee will employ the tiebreaker at Section 10325(c)(9) in an effort to assure that no single housing type will exceed the following percentage goals where other housing type maximums are not yet reached:

Housing Type	**Goal**
Large Family	65%
Large Family New Construction receiving the tiebreaker increase for being located in census tracts, or census block groups as applicable, designated on the CTCAC/HCD Opportunity Area Map as Highest or High Resource Areas	30%
Special Needs	~~30%~~40%
Single Room Occupancy (SRO)	15%
At-Risk	15%
Seniors	~~15%~~20%
Rural Acquisition and/or Rehabilitation	30% of rural set-aside credits

For purposes of the Acquisition and/or Rehabilitation Housing Type goal within the Rural set aside, a project will be considered an acquisition and/or rehabilitation project if at least 50% of the units were previously residential dwelling units.

A large family new construction project that receives a tiebreaker increase in Section 10325(c)(9) for being located in a Highest or High Resource census tract shall count against both that housing type and the general Large Family housing type.

(i) Geographic Apportionments. Annual apportionments of Federal and State Credit Ceiling shall be made in approximately the amounts shown below:

Geographic Area	**Apportionments**
City of Los Angeles	17.6%
Balance of Los Angeles County	17.2%
Central Valley Region (Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties)	8.6%
San Diego County	8.6%
Inland Empire Region (San Bernardino, Riverside, Imperial Counties)	8.3%
East Bay Region (Alameda and Contra Costa Counties)	7.4%
Orange County	7.3%
South and West Bay Region (San Mateo, Santa Clara Counties)	6.0%
Capital Region (El Dorado, Placer, Sacramento, Sutter, Yuba, Yolo Counties)	5.7%
Central Coast Region (Monterey, San Luis Obispo, Santa Barbara, Santa Cruz, Ventura Counties)	5.2%
Northern Region (Butte, Marin, Napa, Shasta, Solano, and Sonoma Counties)	4.4%

San Francisco County 3.7%

(j) Credit available for geographic apportionments. Geographic apportionments, as described in this Section, shall be determined prior to, and made available during each reservation cycle in the approximate percentages of the total Federal and State Credit Ceiling available pursuant to Subsection 10310(b), after CTCAC deducts the federal credits set aside in accordance with Section 10315(a) through (g) from the annual Credit Ceiling.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10317. State Tax Credit Eligibility Requirements.

(a) General. In accordance with the R & T Code Sections 12205, 12206, 17057.5, 17058, 23610.4 and 23610.5, there shall be allowed as a Credit against the "tax" (as defined by R & T Code Section 12201) a State Tax Credit for Federal Credit Ceiling projects pursuant to subsection (g)(1)(A) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code and Tax Exempt Bond Projects pursuant to subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code in an amount equal to no more than 30 percent (30%) of the project's requested construction-related eligible basis. Except for State Farmworker Credits and projects meeting subparagraphs (A) through (D) in subsection (c)(4) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code, the maximum State Tax Credit award amount for a Tax Exempt Bond Project pursuant to subsection (g)(1)(A) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code, or basis described in paragraph (f) below, is 13 percent (13%) of that project's requested eligible basis. The maximum State Farmworker Credit award amount for a Tax-Exempt Bond Project, or basis described in paragraph (f) below, is 75 percent (75%) of that project's requested eligible basis. The maximum State Credit award for a project meeting subparagraphs (A) through (D) in subsection (c)(4) of 12206 of the Revenue and Taxation Code, or basis described in paragraph (f) below, is 95 percent (95%) of that project's requested eligible basis. Insufficient credits due to a low appraised value as described in Subparagraph (C) shall be evidenced as defined in Section 10322(h)(9)(A) of these Regulations: the sum of third-party debt encumbering the seller's property exceeds the appraised value. Substantial rehabilitation as described in Subparagraph (D) shall be evidenced by Section 10326(g)(7) of these Regulations. Award amounts shall be computed in accordance with IRC Section 42, except as otherwise provided in applicable sections of the R & T Code. For purposes of calculating the final State Tax Credit amount on the Form(s) 3521A, the project's actual eligible basis may be used.

(b) Allocation of Federal Tax Credits required. State Tax Credit recipients shall have first been awarded Federal Tax Credits, or shall qualify for Tax Credits under Section 42(h)(4)(b), as required under H & S Code Section 50199.14(e) and the R & T Code Section 12206(b)(1)(A). State Farmworker Credits are exempt from this requirement.

(c) Limit on Credit amount.

(1) Except for applications described in paragraph (d) below, all credit ceiling applications may ~~(c)~~ request State credits provided the project application is not requesting the federal 130% basis adjustment for purposes of calculating the federal credit award amount. Projects are eligible for State credits regardless of their location within a federal Qualified Census Tract (QCT) or a Difficult Development Area (DDA). Notwithstanding paragraph (d) below, applications for the Federal Credit established by the Further Consolidated Appropriations Act, 2020 or the Consolidated Appropriations Act, 2021 are not eligible for State Tax Credits.

(2) An applicant requesting state credits shall not reduce basis related to federal tax credits except to reduce requested basis to the project's threshold basis limit or the credit request

to the amount available in the project's geographic region or the limits described in Section 10325(f)(9)(C). CTCAC shall revise the basis and credit request if the applicant fails to meet this requirement.

(3) In the event that reservations of state credits to credit ceiling applications exceed the amount of state credits available, CTCAC post-reservation shall designate applications for which there are insufficient state credits as difficult development area (DDA) projects pursuant to Section 10327(d)(3) and exchange state credits for federal credits in an amount that will yield equal equity based solely on the tax credit factors stated in the application and may exceed the maximum annual Federal Tax Credits in Section 10325(f)(9)(C).

(4) For projects applying for State Tax Credits in paragraph (j), the maximum request for any one project in any funding round shall not exceed Two Hundred Thousand ($200,000) dollars per Tax Credit Unit. Farmworker Housing projects are exempt from this requirement.

(d) (1) Under authority granted by Revenue and Taxation Code Sections 12206(b)(2)(E)(ii), 17058(b)(2)(E)(ii), and 23610.5(b)(2)(E)(ii), applications for Special Needs projects with at least 50% of the Low-Income Units designated as special needs units and within a QCT or DDA may request the federal 130% basis boost and may also request State credits, provided that the applicant does not reduce basis related to federal tax credits except to reduce requested basis to the project's threshold basis limit or the credit request to the amount available in the project's geographic region or the limits described in Section 10325(f)(9)(C). CTCAC shall revise the basis and credit request if the application fails to meet this requirement. Under authority granted by Internal Revenue Code Section 42(d)(5)(B)(v), CTCAC designates Special Needs housing type applicants for credit ceiling credits as Difficult Development Area projects, regardless of their location within a federally designated QCT or DDA.

(2) Under authority granted by Revenue and Taxation Code Sections 12206(b)(2)(E)(iii),17058(b)(2)(E)(iii), and 23610.5(b)(2)(E)(iii), applications for 4% federal tax credits plus State Farmworker Credits within a QCT or DDA may request the federal 130% basis boost and may also request State credits

(3) Under authority granted by Revenue and Taxation Code Sections 12206(b)(2)(E)(iii), 17058(b)(2)(E)(iii), and 23610.5(b)(2)(E)(iii), new construction applications for 4% federal tax credits plus State Credits pursuant to subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code within a QCT or DDA may request the federal 130% basis boost and may also request State credits.

(4) Applications for the Federal Credit established by the Further Consolidated Appropriations Act, 2020 or the Consolidated Appropriations Act, 2021, including Special Needs projects described in this section (d), are not eligible for State Tax Credits.

(e) State Tax Credit exchange. Applications for projects not possessing one of the allocation priorities described in subsection (d) may also include a request for State Tax Credits. During any reservation cycle and/or following any reservation or allocation of State Tax Credits to all applications meeting the above allocation priorities, remaining balances of State Tax Credits maybe awarded to applicants having received a reservation of Federal Tax Credits during the same year, in exchange for the "equivalent" amount of Federal Tax Credits. Said exchanges shall be offered at the discretion of the Executive Director, who may consider and account for any fiscal or administrative impacts on the project or applicant pool when deciding to whom he/she will offer State Tax Credits.

(f) Acquisition Tax Credits. State Tax Credits for acquisition basis are allowed only for projects meeting the definition of a project "at risk of conversion," pursuant to Section 42 and R & T Code Section 17058(c)(4).

(g) Tax-Exempt Bond Financing.

(1) ~~(g)~~ Projects financed under the tax-exempt bond financing provisions of Section 42(h)(4)(b) of the IRC, subsection (g)(1)(A) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code and Section 10326 of these regulations may apply for State Tax Credits if the following conditions are met:

~~(1)~~ (A) the project is comprised of 100% Tax Credit Units. Excepted from this rule are projects proposed for acquisition and rehabilitation that were developed under the HUD Section 236 or 202 programs, and are subject to those programs' use restrictions. Projects under those circumstances may propose a lesser percentage of Tax Credit Units to accommodate existing over-income residents who originally qualified under Section 236 or 202 income eligibility;

~~(2)~~ (B) one or more buildings is not eligible for the 130% basis adjustment, in which case the State Tax Credits shall be available only for the buildings not eligible for the 130% basis adjustment. This paragraph shall not apply to projects referenced in Section 10317(d);

~~(3)~~ (C) State Tax Credits will not be available to projects that have already received a reservation of 4% credit in the previous year; and

(2) For projects financed under the tax-exempt bond financing provisions of Section 42(h)(4)(b) of the IRC, subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code and Section 10326 of these regulations applying for State Tax Credits. State Tax Credits will not be available to projects that have already received a reservation of 4% credit in a previous year.

(h) State Farmworker Credit.

(1) ~~(h)~~ Applicants may request State Farmworker Credits for eligible Farmworker Housing in combination with federal credits, or they may request State Farmworker Credits only. If seeking a federal Credit Ceiling reservation, applicants may apply only during competitive rounds as announced by CTCAC and shall compete under the provisions of Section 10325(c) et. seq. If requesting federal credits for use with tax exempt bond financing, or State Farmworker Credits only, applicants may apply over the counter and shall meet the threshold requirements for projects requesting 4% federal credits.

(~~1~~2) If more than one applicant is requesting nine percent (9%) federal credits in combination with State Farmworker Credits during a competitive round, CTCAC shall award available State Farmworker Credits to the highest scoring Farmworker Housing application that will receive a reservation of federal credits.

(3) If available State Farmworker Credits are inadequate to fully fund a pending request for eligible Farmworker Housing, CTCAC may reserve a forward commitment of subsequent year's State Farmworker Credits for that project alone.

(i) State Tax Credit Allocations pursuant to subsection (g)(1)(A) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code to bond financed projects. The following parameters apply:

(1) In calendar years where there are additional state tax credits available to bond financed projects, an amount equal to fifteen percent (15%) of the annual State Tax Credit authority will be available for acquisition and/or rehabilitation bond financed projects, with a ranking priority for projects meeting subparagraphs (A) through (D) in subsection (c)(4) of 12206 of the Revenue and Tax Code. In all other years, an amount equal to fifteen percent (15%) of the annual State Tax Credit authority will be available for bond financed projects of any

construction type. CTCAC shall make reservations up to the 15% limit beginning with the first application review period of a calendar year for tax-exempt bond financed projects;

(2) The project will be competitively scored by CDLAC according to the CDLAC scoring and ranking system delineated in Section 5230 of the CDLAC Regulations. Notwithstanding the foregoing, existing tax credit projects must comply with the requirements of Section 10326(g)(8)(A);

(3) If the 15% set-aside has not been reserved prior to year end it may be used in a State Tax Credit exchange for projects that have received 9% Tax Credit reservations;

(4) The Committee may reserve an amount in excess of the 15% set-aside of State Tax Credits for the last funded tax-exempt bond financed project if that project requires more than the State Tax Credits remaining in this set aside if (1) fewer than half of the State Tax Credits annually available for the credit ceiling competition are reserved in the first competitive credit round, or (2) if State Credits remain available after funding of competitive projects in the second CTCAC funding round.

(5) Staff shall identify high-cost projects by comparing each scored project's total eligible basis against its total adjusted threshold basis limits, excluding any increase for deeper targeting pursuant to Section 10327(c)(5)(C). CTCAC shall calculate total eligible basis consistent with the method described in Section 10325(d), except that the amount of developer fee in basis that exceeds the project's deferral/contribution threshold described in Section 10327(c)(2)(B) shall be excluded. A project will be designated "high cost" if a project's total eligible basis exceeds its total adjusted threshold basis limit by 30%. Staff shall not recommend such project for credits. Any project may be subject to negative points if the project's total eligible basis at placed in service exceeds the revised total adjusted threshold basis limits for the year the project is placed in service (or the original total eligible threshold basis limit if higher) by 40%.

(j) State Tax Credit Allocations pursuant to subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code.

(1) For calendar years beginning in 2021, an amount up to five hundred million dollars ~~(j)~~ ($500,000,000) in total State Tax Credit authority will be available (if authorized in the California Budget Act or related legislation) for new construction Tax Exempt Bond Projects, including retrofitting or repurposing of existing nonresidential structures that were converted to residential use within the previous five years from the date of application subject to the requirements of the ~~California Debt Limit Allocation Committee~~CDLAC regulations and the requirements of Section 10326 of these regulations. For calendar years 2024 to 2034 where any additional credits are available pursuant to subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code, the lesser of five percent (5%) or $25,000,000 shall be available to Farmworker Housing. Any credits pursuant to this clause that remain unallocated following the conclusion of a funding round shall roll over to the subsequent funding rounds in that calendar year with the exception that any credits that remain unallocated after~~prior to~~ the final funding round in that calendar year shall be added back to the aggregate amount of credits that may be allocated pursuant to this subparagraph. The approximate amount of State Tax Credits available in each reservation cycle shall be established by the Committee annually at a public meeting.

(2) No later than the CDLAC bond issuance deadline, the applicant must submit to CTCAC building permits (a grading permit does not suffice to meet this requirement except that in the event that the city or county as a rule does not issue building permits prior to the completion of grading, a grading permit shall suffice; if the project is a design-build project in which the city or county does not issue building permits until designs are fully complete, the city or county shall have approved construction to begin) or the applicable tribal documents, and notice to proceed delivered to the contractor.

(3) Failure to submit said documents to CTCAC by the CDLAC bond issuance deadline shall result in rescission of the Tax Credit Reservation and may result in assessment of negative points.

(k) All projects that have received state credits shall comply with the limitations on cash distributions required pursuant to Sections 12206(d), 17058(d), and 23610.5(d) of the Revenue and Taxation Code.

(1) In the initial application, applicants requesting state credits shall make an election to sell ("certificate") or not sell all or any portion of the state credit, as allowed pursuant to Revenue and Taxation Code Sections 12206(o), 17058(q), and 23610.5(r). The applicant for a certificated credit shall be a non-profit entity and the state credit price shall not be less than eighty (80) cents per dollar of credit. The applicant may, only once, revoke an election to sell at any time before CTCAC issues the Form(s) 3521A for the project, at which the point the election shall become irrevocable.

(2) An applicant who elects to sell any portion of the state credit and a buyer who later resells any portion of the credit shall report to CTCAC within 10 days of the sale of the credit, in a form specified by CTCAC, all required information regarding the purchase and sale of the credit, including the social security or other taxpayer identification number of the party or parties to whom the credit has been sold, the face amount of the credit sold, and the amount of consideration received for the sale of the credit. At the request of the owner, CTCAC shall reissue the Form(s) 3521A in the name of the buyer.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10320. Actions by the Committee.

(a) Meetings. Except for reservations made pursuant to Section 10325(h) of these Regulations, Reservations of Tax Credits shall occur only at scheduled meetings of the Committee, which shall announce application-filing deadlines and the approximate dates of reservation meetings as early in the year as possible.

(b) Approvals required by this Section 10320(b) shall not be unreasonably withheld if all of the following requirements, as applicable, are satisfied:

(1) No allocation of the Federal or State Credits, or ownership of a Tax Credit project, may be transferred without prior written approval of the Executive Director. In the event that prior written approval is not obtained, the Executive Director may assess negative points pursuant to section 10325(c)(2)(M), in addition to other remedies. Subparagraphs (A) through (C) apply to all ownership or Tax Credit transfers requested after January 31, 2014. Subparagraphs (A) through (E) apply to all ownership or Tax Credit transfers requested after April 3, 2024:

(A) Any transfer of project ownership (including changes to any general partner, member, or equivalent responsible party), or allocation of Tax Credits shall be evidenced by a written agreement between the parties to the transfer, including agreements entered into by the transferee and the Committee.

(B) The entity replacing a party or acquiring ownership or Tax Credits shall be subject to a "qualifications review" by the Committee to determine if sufficient project development and management experience is present for owning and operating a Tax Credit project. Information regarding the names of the purchaser(s) or transferee(s), and detailed information describing the experience and financial capacity of said persons, shall be provided to the Committee. Any general partner change during the 15-year federal compliance and extended use period must be to a party earning equal capacity points pursuant to Section 10325(c)(1)(A) as the exiting general partner. At a minimum this must be three (3) projects in service more than three years, or the demonstrated training required under Section 10326(g)(5). Two of the three projects must be Low Income Housing Tax Credit projects in California. If the new general partner does not meet these experience requirements, then substitution of general partner shall not be permitted. The requirements of this paragraph apply to a change to any general partner, member, or equivalent responsible party where an exiting party meets the experience capacity and the remaining party does not have experience equal to the minimum stated above.

(C) The transferor shall deliver all tenant files, inspection records, financial statements, and reserve balances to the transferee prior to or concurrent with the transfer. Failure to deliver such records may subject the transferor to negative points or a fine.

(D) The Executive Director shall not approve a transfer if, in any of the five calendar years prior to the transfer date or in the year to date of the transfer but not earlier than April 3, 2024, the owner has increased the rent for any low-income household in excess of the amounts described in Section ~~10328(a)(4)~~10336(a).

(E) The transferee shall annually certify that they have not increased the rent for any low-income household in excess of the amounts described in Section ~~10328(a)(4)~~10336(a).

(2) In addition to any applicable requirements set forth in Section 10320(b)(1), all Transfer Events shall be subject to the prior written approval of the Executive Director. In the event that prior written approval is not obtained, the Executive Director may assess negative points pursuant to section 10325(c)(2)(M), in addition to other remedies. The following requirements apply to all Transfer Events for which approval is requested on or after October 21, 2015:

(A) Prior to a Transfer Event, the owner of the project shall submit to the Executive Director a Qualified Capital Needs Assessment. In the case of a Transfer Event in which a third-party lender is providing financing, the Qualified Capital Needs Assessment shall be commissioned by said third-party lender.

(B) The entity which shall own the project subsequent to the Transfer Event (the “Post Transfer Owner”) shall covenant to the Committee (the “Capital Needs Covenant”) that the Post Transfer Owner (and any assignee thereof) shall:

(i) set aside at the closing of the Transfer Event adequate funds to perform the Short Term Work (the “Short Term Work Reserve Amount”);

(ii) perform the Short Term Work within three (3) years from the date of the Transfer Event;

(iii) make deposits to reserves as are necessary to fund the Long Term Work, taking into account any balance in replacement reserve accounts upon the conclusion of the Transfer Event beyond those required by clause (i). Notwithstanding the foregoing, the Post Transfer Owner shall have no obligation to fund any reserve amount from annual operations to the extent that the funding of the reserve causes the project to have a debt service coverage ratio of less than 1.00 to 1.00. In calculating the debt service coverage ratio for the purposes herein, the property management fee shall not exceed the greater of (a) 7% the project’s effective gross income, or (b) such amount approved by HUD or USDA, as applicable. Any property management fee in excess of these limitations shall be subordinate to the funding of the required reserves and shall not be considered when calculating the debt service coverage ratio; and complete the Long Term Work when required, or prior thereto, pursuant to the Qualified CNA~~apital Needs Assessment~~.

(C) The Executive Director may waive or modify the requirements of this Section 10320(b)(2)(A) and (B) if the owner can demonstrate that the Transfer Event will not produce, prior to any distributions of Net Project Equity to parties related to the sponsor, developer, limited partner(s) or general partner(s), sufficient Net Project Equity to fund all or any portion of the work contemplated by the Qualified CNA~~apital Needs Assessment~~. There shall be a presumption that a Transfer Event has insufficient Net Project Equity (and the requirements of this Section 10320(b)(2)(A) and (B) shall be waived) if no Net Project Equity from the Transfer Event is distributed to parties related to the sponsor, developer, general partner(s) or limited partner(s) of the owner other than a distribution or a payment to the limited partner(s) of the selling entity in the amount equal to, or less than, all federal, state, and local taxes incurred by the limited partner(s) as a result of the Transfer Event.

(3) The Capital Needs Covenant shall at all times be subordinate to any deed of trust given to any third party lender to a project. The owner of a project subject to a Capital Needs Covenant shall certify compliance with the terms of said Capital Needs Covenant to CTCAC annually for the term of the Capital Needs Covenant on a form to be developed by the Executive Director. Failure to comply with the terms of the Capital Needs Covenant may subject the owner to negative points and/or a ban on buying or receiving future properties.

(4) If a project seeks to receive a new reservation of 9% or 4% tax credits concurrently with a Transfer Event or during the time that the project is subject to a Capital Needs Covenant, the following provisions shall apply in lieu of paragraph (2):

(A) The applicant shall submit a Qualified CNA~~apital Needs Assessment~~. In cases in which a third-party lender is providing financing, the Qualified CNA~~apital Needs Assessment~~ shall be commissioned by said third-party lender.

(B) The rehabilitation scope of work shall include all of the Short Term Work. The applicant may receive eligible basis for the costs of the Short Term Work only if the applicant can demonstrate that the Short Term Work was funded by one of the following:
(i) a credit from the seller of the project equal to the costs of Short Term Work.
(ii) a reduction in the purchase price of the project as compared to the purchase price of the project had the project not been subject to the Transfer Event requirement, as shown by an appraisal that calculates the impact of the Short Term Work requirement on value.
(iii) general partner equity.
(iv) developer fee contributed to the project (a deferred developer fee does not qualify).

(C) After the Transfer Event giving rise to the covenant required pursuant to Section 10320(b)(2)(B) (the "Initial Transfer"), if the project will be subsequently transferred in connection with the closing of the new reservation of 9% or 4% credits (a "Subsequent Transfer"), any increase in acquisition price (if the Initial Transfer was a sale) or the project valuation (if the Initial Transfer was a refinancing) between the Initial Transfer and the Subsequent Transfer which is attributable to a reduction in the amount of annual deposits into the replacement reserve account from those required pursuant to Section 10320(b)(2)(B)(iii) because all or a portion of the Long Term Work will be performed in connection with the new reservation of 9% or 4%

credits, must be evidenced in the form of (i) a seller carryback note or (ii) a general partner equity contribution.

(D) Upon the closing of the syndication of the new 9% or 4% credits reserved for the project, any Capital Needs Covenant shall automatically terminate without any further action of the project owner and/or the Committee.

(E) The Executive Director shall waive or modify the requirements of this Section 10320(b)(4) if the owner can demonstrate that the Transfer Event will not produce, prior to any distributions of Net Project Equity to parties related to the sponsor, developer, limited partner(s) or general partner(s), sufficient Net Project Equity to fund all or any portion of the work contemplated by the Qualified CNA~~apital Needs Assessment~~. There shall be a presumption that a Transfer Event has insufficient Net Project Equity if no Net Project Equity from the Transfer Event is distributed to parties related to the sponsor, developer, general partner(s) or limited partner(s) of the owner other than a distribution or a payment to the limited partner(s) of the selling entity in the amount equal to, or less than, all federal, state, and local taxes incurred by the limited partner(s) as a result of the Transfer Event.

(F) Sections 10320(b)(4)(B) and 10320(b)(4)(C) shall not be applicable to any project with an existing tax credit regulatory agreement with a remaining term of five (5) or less years.

(5) No management company of an existing or new tax credit project shall be replaced without prior written approval of the Executive Director. In the event that prior written approval is not obtained, the Executive Director may assess negative points or a fine. With respect to 4% tax credit projects, management companies ineligible for at least two management company experience points pursuant to Section 10325(c)(1)(B) shall obtain training in project operations, on-site certification, ~~f~~Fair ~~h~~Housing ~~l~~Law, and manager certification in IRS Section 42 program requirements from CTCAC or a CTCAC-approved, nationally recognized entity. The out-going management company shall deliver all tenant files, inspection records, financial statements, and reserve balances to the in-coming management company prior to or concurrent with the transfer. Failure to deliver such records may subject the out-going management company to negative points or a fine.

(6) Except for resyndication applications without a distribution of Net Project Equity, if a project seeks to receive a new reservation of 9% or 4% tax credits, any uncorrected Form(s) 8823 for life and safety violations (life-threatening and non-life threatening) and for Uniform Physical Condition Standards violations that are in existence at the time of the CTCAC application must be corrected by the project owner that received the Form(s) 8823. The resyndication application shall not include any costs to correct these Form(s) 8823.

(7) An applicant seeking to (1) demolish or similarly alter any of the existing structures currently subject to CTCAC regulatory restrictions when seeking a new reservation of 9% and/or 4% tax credits; and/or (2) separate an existing project currently subject to CTCAC regulatory restrictions into multiple projects must request and receive prior written approval of the Executive Director. Projects that involve the demolition of existing residential units or separating an existing project must increase the unit count by (i) 25 or (ii) 50% of the existing demolished units, whichever is greater, unless, for existing SRO projects, waived by the Executive Director provided that the applicant demonstrates that full compliance would be impractical.

(8) A project owner seeking to sell a portion of vacant or unused land must request and receive prior written approval of the Executive Director. The sales proceeds must either: 1) be contributed (not loaned) to a new multifamily affordable housing restricted project; or 2) reduce rents at the existing property by the aggregate amount of the proceeds. The project owner must request and receive prior written approval of the Executive Director.

(c) CTCAC shall initially subordinate its regulatory contract to a permanent lender but thereafter shall not subordinate existing regulatory contracts to acquisition or refinancing debt, except in relation to new Deeds of Trust for rehabilitation loans, FHA-insured loans, restructured public loans, or as otherwise permitted by the Executive Director. At the request of the owner, CTCAC shall enter into a stand-still agreement permitting the acquisition or refinance lender 60 days to work with the owner to remedy a breach of the regulatory contract prior to CTCAC implementing any of the remedies in the regulatory contract, except that CTCAC shall not enter into a stand-still agreement related to a Transfer Event requested on or after October 21, 2015 unless the conditions of Section 10320(b)(2) have been satisfied. If CTCAC enters into a stand-still agreement related to a Transfer Event, Sections 10320(b)(2), (b)(3) and (b)(4) shall apply to the project.

(d) False information. Upon being informed, or finding, that information supplied by an applicant, any person acting on behalf of an applicant, or any team member identified in the application, pursuant to these regulations, is false or no longer true, and the applicant has not notified CTCAC in writing, the Committee may take appropriate action as described in H & S Code Section 50199.22(b) and in section 10325(c)(2) of these regulations. Additionally the Executive Director may assess negative points to any or all members of the development team as described in Section 10322(h)(5).

(e) CTCAC shall not enter into a qualified contract, as defined in IRC Section 42(h)(6)(F).

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10322. Application Requirements.

(a) Separate Application. A separate application is required for each project.

(b) Application forms. Applications shall be submitted on forms provided by the Committee. Applicants shall submit the most current Committee forms and supplementary materials in a manner, format, and number prescribed by the Committee.

(c) Late application. Applications received after an application-filing deadline shall not be accepted.

(d) Incomplete application. Determination of completeness, compliance with all Basic and Additional Thresholds, the scoring of the application, and any application submission requirements pursuant to these regulations and the application form shall be based on the documents contained in the application as of the final filing deadline except as provided in Section 10322(e). ~~Application omissions may be accepted after the application-filing deadline pursuant to Section 10322(e) at the sole discretion of the Executive Director, if determined that the deficiency is an application omission of either a document existing as of the application-filing deadline, or a document certifying to a condition existing at the time of the application-filing deadline.~~ Applications not meeting all application information and submission~~these~~ requirements shall be considered incomplete, and shall be disqualified from receiving a reservation of Tax Credits during the cycle in which the application was determined incomplete. Disqualified~~An~~ applicants shall be notified in writing by the Committee of the basis for disqualification and may appeal the disqualification under Section 10330~~should its application be deemed incomplete and the application will not be scored~~.

(e) ~~Complete a~~Application Omissions. No additional documents pertaining to: the Basic or Additional Threshold Requirements; scoring categories; and any application submission requirements pursuant to these regulations and the application form shall be accepted after the application-filing deadline unless the Executive Director, at ~~his or her~~their sole discretion, determines that the deficiency is an application omission of either a document existing as of the application-filing deadline, or a document certifying to a condition existing at the time of the application-filing deadline. ~~In such cases,~~Any submission of additional documents, including as part of an appeal for an ~~applicant~~applications disqualified under Section 10322(d), shall include evidence demonstrating either the document existed as of the application-filing deadline, or the document certifies to a condition existing at the time of the application-filing deadline. It is within the Executive Director's discretion to request any clarifying information or material regarding the additional document(s)~~shall be given up to five (5) business days from the date of receipt of staff notification, to submit said documents to complete the application. For application omissions, the Executive Director may request additional clarifying information from third party sources, such as local government entities, or the applicant, but this is entirely at the Executive Director's discretion. Upon the Executive Director's request, the information sources shall be given up to five (5) business days, from the date of receipt of staff notification, to submit said documents to clarify the application. The third-party sources shall certify that all evidentiary documents deemed to be missing from the application had been executed, and were in the third-party source's possession, on or prior to, the application-filing deadline~~.

~~If required documents are not submitted within the time provided, the application shall be considered incomplete and no appeal will be entertained.~~

(f) Application changes. Notwithstanding Section 10322(e), no application changes are permitted except as allowed under ~~Only the Committee may change an application as permitted by~~ Sections 10317(d), 10325(c)(6)(B), and 10327(a). Any changes made ~~by the Committee~~ pursuant to those sections shall never increase the score or credit amount of the application as submitted, and may reduce the application's score and/or credit amount.

(g) Applications not fully evaluated. Incomplete applications or others not expected to receive a reservation of Tax Credits due to relatively low scores, may or may not be fully evaluated by the Committee.

(h) Standard application documents. The following documentation relevant to the proposed project is required to be submitted with all applications:

(1) Applicant's Statement. A completed and signed version of the CTCAC Applicant Statement signifying the responsibility of the applicant to:

(A) provide application related documentation to the Committee upon request;

(B) be familiar with and comply with Credit program statutes and regulations;

(C) hold the Committee and its employees harmless from program-related matters;

(D) acknowledge the potential for program modifications resulting from statutory or regulatory actions;

(E) acknowledge that Credit amounts reserved or allocated may be reduced in some cases when the terms and amounts of project sources and uses of funds are modified

~~(E)~~
(F) agree to comply with local, state, and federal laws, constitutions, codes, standards, rules, guidelines, and regulations, including, without limitation, those that pertain to accessibility, construction, health and safety, labor, fair housing, fair employment practices, affirmatively furthering fair housing, nondiscrimination, and equal opportunity, including the Fair Housing and Non-Discrimination Laws and Housing and Accessibility Requirements ~~laws outlawing discrimination~~;

(G) disclose any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of fair housing or anti-discrimination laws and the status of the proceeding, as applicable;

~~(G)~~(H) acknowledge that the Committee has recommended the applicant seek tax advice;

~~(H)~~(I) acknowledge that the application will be evaluated according to Committee regulations, and that Credit is not an entitlement;

~~(I)~~(J) acknowledge that continued compliance with program requirements is the responsibility of the applicant;

~~(J)~~(K) acknowledge that information submitted to the Committee is subject to the Public Records Act;

~~(K)~~(L) agree to enter with the Committee into a regulatory contract if Credit is allocated; and,

~~(L)~~(M) acknowledge, under penalty of perjury, that all information provided to the Committee is true and correct, and that applicant has an affirmative duty to notify the Committee of changes causing information in the application or other submittals to become false.

(2) The Application form. Completion of all applicable parts of Committee-provided application forms which shall include, but not be limited to:

(A) General Application Information
(i) Credit amounts requested
(ii) minimum set-aside election
(iii) application stage selection
(iv) set-aside selection
(v) housing type

(B) Applicant Information
(i) applicant role in ownership
(ii) applicant legal status
(iii) developer type
(iv) contact person

(C) Development Team Information

(D) Subject Property Information

(E) Proposed Project Information
(i) project type
(ii) Credit type
(iii) building and unit types

(F) Land Use Approvals

(G) Development Timetable

(H) Identification and Commitment Status of Fund Sources

(I) Identification of Fund Uses

(J) Calculation of Eligible, Qualified and Requested Basis

(K) Syndication Cost Description

(L) Determination of Credit Need and Maximum Credit Allowable

(M) Project Income Determination

(N) Restricted Residential Rent and Income Proposal

(O) Subsidy Information

(P) Operating Expense Information

(Q) Projected Cash Flow Calculation

(R) Basic Threshold Compliance Summary

(S) Additional Threshold Selection

(T) Tax-exempt Financing Information

(U) Market Study

(3) Organizational documents. An organizational chart and a detailed plan describing the ownership role of the applicant throughout the low-income use period of the proposed project, and the California Secretary of State certificate for the project owner (if available). An executed limited partnership agreement may be submitted as documentation that the project ownership entity is formed. If the project owner is not yet formed, provide the certificate for the managing general partner or the parent company of the proposed project owner. A reservation of credit cannot be made to a to-be-formed entity.

(4) Designated contact person. A contract between the applicant and the designated contact person for the applicant signifying the contact person's authority to represent and act on behalf of the applicant with respect to the Application. The Committee reserves its right to contact the applicant directly.

(5) Identification of project participants. For purposes of this Section all of the following project participants, if applicable will be considered to be members of the Development Team. The application must contain the company name and contact person, address, telephone number, and fax number of each:

(A) developer;

(B) general contractor;

(C) architect;

(D) attorney

(E) tax professional;

~~(E)~~(F) Supportive Services coordinator, if applicable;

~~(F)~~(G) property management company;

~~(G)~~(H) consultant;

~~(H)~~(I) market analyst and/or appraiser; and

~~(I)~~(J) CNA consultant.

If any members of the Development Team have not yet been selected at the application filing deadline, each must be named and materials required above must be submitted at the 180 or 194 day deadline described in Section 10325(c)(7).

(6) Identities of interest. Identification of any persons or entities (including affiliated entities) that plan to provide development or operational services to the proposed project in more than one capacity, and full disclosure of Related Parties, as defined.

(7) Legal description. A legal description of the subject property.

(8) Site Layout, Location, Unique Features and Surrounding Areas.

(A) A narrative description of the current use of the subject property;

(B) A narrative description of all adjacent property land uses, the surrounding neighborhood, and identification and proximity of services, including transportation

(C) Labeled photographs, or color copies of photographs of the subject property and all adjacent properties;

(D) A layout of the subject property, including the location and dimensions of existing buildings, utilities, and other pertinent features.

(E) A site or parcel map indicating the location of the subject property and showing exactly where the buildings comprising the Tax Credit Project will be situated. (If a subdivision is anticipated, the boundaries of the parcel for the proposed project must be clearly marked; and

(F) A description of any unique features of the site, noting those that may increase project costs or require environmental mitigation.

(9) Appraisals. Appraisals are required for:1) all rehabilitation applications except as noted in subsection (A), below, 2) all adaptive reuse applications, 3) all competitive applications, except for new construction projects that are on tribal trust land or that have submitted a third party purchase contract with, or evidence of a purchase from, an unrelated third party, 4) all applications seeking tiebreaker credit for donated or leased land, or land with a soft loan and 5) all new construction applications involving a land sale from a related party. For purposes of this paragraph only, a purchase contract or sale with a related party shall be deemed to be a purchase contract or sale with an unrelated party if the applicant demonstrates that the related party is acting solely as a pass-through entity and the tax credit partnership is only paying the acquisition price from the last arms-length transaction, plus any applicable and reasonable carrying costs. Appraisals shall not include the value of favorable financing.

Appraisals must be prepared by a California certified general appraiser having no identity of interest with the development's partner(s) or intended partner or general contractor, acceptable to the Committee, and include, at a minimum, the following:

(i) the highest and best use of the proposed project as residential rental property, considering any on-going recorded rent restrictions;

(ii) for rehabilitation applications, the Sales Comparison Approach and Income Approach valuation methodologies shall be used; for new construction applications, the Sales Comparison Approach shall be used; for adaptive reuse applications, the Cost Approach valuation methodology shall be used for adaptive reuse of office buildings, retail buildings, and similar, and the Sales Comparison and Income Approaches may be used for hotels, motels, and similar;

(iii) the appraiser's reconciled value, in cases that require multiple methodologies;

(iv) a value for the land of the subject property ("as if vacant");

(v) an on-site inspection; and

(vi) a purchase contract verifying the sales price of the subject property.

(A) Rehabilitation applications. An "as-is" appraisal is required with a date of value that is within 120 days before or after the execution of: a purchase contract; for leased land, an executed development agreement negotiated between the landowner and the applicant or developer; an option agreement; any other site control document pursuant to Section 10325(f)(2); or the transfer of ownership by all the parties

For tax-exempt bond-funded properties receiving credits under Section 10326 only or in combination with State Tax Credits, the applicant may elect to forego the appraisal required pursuant to this section and use an acquisition value equal to the sum of the third-party debt encumbering the seller's property, which may increase during subsequent reviews to reflect the actual amount.

(B) New construction applications. Projects for which an appraisal is required above shall provide an "as-is" appraisal with a date of value that is within either:

(i) 120 days before or after the execution of a purchase contract; for leased land, an executed development agreement negotiated between the landowner and the applicant or developer; an option agreement; any other site control document pursuant to Section 10325(f)(2); the transfer of ownership by all the parties, or

(ii) one year of the application date if the latest purchase contract, development agreement, option agreement, or any other site control document pursuant to Section 10325(f)(2) was executed within that year.

An amendment to an agreement does not constitute any of the agreements listed in (i) or (ii) above.

(C) Adaptive reuse applications. All adaptive reuse applications must submit an appraisal using an "as-is" appraisal date of value as stated in (B) above. For applications required to use the Cost Approach, the appraisal must consider the age, condition, and depreciated value of the existing building(s) when utilizing newly constructed "shell" sales comparisons and must include these calculations in the report.

For applications with existing project-based rental subsidy, the Income Approach shall not include post-rehabilitation contract rent(s). Rent(s) used in the Income Approach, if not the existing approved contract rent, must be supported by a rent comparable study or similar. For applications with existing affordability restrictions, the Income Approach must be based on the affordability restrictions and restricted rents encumbering the property (a "restricted value") unless all affordability restrictions will expire within five years.

CTCAC may contract with an appraisal reviewer who may review submitted appraisals. If it does so, CTCAC shall commission an appraisal review. If the appraisal review finds the submitted appraisal to be inappropriate, misleading, or inconsistent with the data reported and with other generally known information, then the reviewer shall develop ~~his or her~~their own opinion of value and CTCAC shall use the opinion of value established by the appraisal reviewer.

(10) Market Studies. A full market study prepared or updated within 180 days of the filing deadline by an independent third-party having no identity of interest with the development's partners, intended partners, or any other member of the Development Team described in Subsection (5) above. The study must meet the current market study guidelines distributed by the Committee, and establish both need and demand for the proposed project. CTCAC shall publicly notice any changes to its market study guidelines and shall take public comment consistent with the comment period and hearing provisions of Health and Safety Code Section 50199.17. For scattered site projects, a market study may combine information for all sites into one report, provided that the market study has separate rent comparability matrices for each site. A new construction hybrid 9% and 4% tax credit development may combine information for both component projects into one report and, if not, shall reflect the other component project as a development in the planning or construction stages.

~~A market study shall be updated if the proposed project rents change by more than five percent (5%), or the distribution of higher rents increases by more than 5%, or more than 12 months have passed since the most recent site inspection date of the subject property and comparable properties.~~ All market studies shall meet all of the requirements listed in the CTCAC Market Study Guidelines as listed on the CTCAC website. If the market study does not meet the guidelines, and support sufficient need and demand for the project, the application may be considered ineligible to receive Tax Credits and may be disqualified.

For acquisition/rehabilitation projects meeting all of the following criteria, a comprehensive market study as outlined in IRS Section 42(m)(1)(A)(iii) shall mean a written statement by a third-party market analyst certifying that the project meets these criteria:

- All of the buildings in the project are subject to existing federal or state rental assistance or operating subsidies, an existing CTCAC Regulatory Agreement, or an existing regulatory agreement with a federal, state, or local public entity.
- The proposed tenant-paid rents and income targeting levels shall not increase by more than five percent (5%) (except that proposed rents and income targeting levels for units subject to a continuing state or federal project-based rental assistance contract may increase more and proposed rents and income targeting levels for resyndication projects shall be consistent with Section 10325(f)(11) or Section 10326(g)(8)).
- The project shall have a vacancy rate of no more than ten percent (10%) for special needs units and non-special needs SRO units without a significant project-based public rental subsidy and five percent (5%) for all other units at the time of the tax credit application.

(11) Construction and design description. A detailed narrative description of the proposed project construction and design, including how the design will serve the targeted population.

(12) Architectural drawings. Preliminary drawings of the proposed project, including a site plan, building elevations, and unit floor plans (including square footage of each unit). The project architect shall certify that the design of the development will comply with building codes and the physical building requirements of all applicable Housing and Accessibility Requirements~~fair housing laws~~. In the case of rehabilitation projects proceeding without an architect, the entity performing the CNA~~apital Needs Assessment~~ shall note necessary fair housing improvements, and the applicant shall budget for and implement the related construction work. The site plan shall identify all areas or features proposed as project amenities, laundry facilities, recreation facilities and community space. Drawings shall be to a scale that clearly shows all requested information. Blueprints need not be submitted. A project applying as a High-Rise Project must include the project architect certification in accordance with the High-Rise Project definition in Section 10302.

(13) Placed-in-service schedule. A schedule of the projected placed-in-service date for each building.

(14) Identification of local jurisdiction. The following information related to the local jurisdiction within which the proposed project is located:

(A) jurisdiction or tribe (e.g., City of Sacramento)

(B) chief executive officer or tribal chairperson and title (e.g., Susan Smith, City Manager)

(C) mailing address

(D) telephone number

(E) fax number

(15) Sources and uses of funds. The sources and uses of funds description shall separately detail apportioned amounts for residential space and commercial space.

(16) Financing plan. A detailed description of the financing plan, and proposed sources and uses of funds, to include construction, permanent, and bridge loan sources, and other fund sources, including rent or operating subsidies and reserves. The commitment status of all fund sources shall be described, and non-traditional financing arrangements shall be explained.

(17) Eligible basis certification. A certification from a third party certified public accountant or tax attorney that project costs included in applicant's calculation of eligible basis are allowed by IRC Section 42, as amended, and are presented in accordance with standard accounting procedures. This must be delivered on the tax professional's corporate letterhead, in the prescribed CTCAC format and must include a statement that the Sources and Uses Budget was reviewed and that the accountant or attorney discussed the budget with the applicant as needed.

(18) Use of tax benefits description. If the Tax Credits are not to be offered to investors, a detailed explanation of how the tax benefits will be used by the applicant.

(19) Terms of syndication agreement. Written estimate(s) from syndicator(s) or financial consultants on their corporate letterhead and in the prescribed CTCAC format, of equity dollars expected to be raised for the proposed project, based on the amount of Tax Credits requested, including gross and net proceeds, pay-in schedules, syndication costs (including syndicator consulting fees), and an estimated net tax Credit factor, for both Federal and State Tax Credits if both are to be used or if State Tax Credits exchange points are requested. The syndicator shall not pay any fees or provide any other financial or other substantive benefit to a partnership developer unless all such fees or benefits are fully and completely disclosed to CTCAC in the Executed Letter of Intent.

(20) Tax Credit certification. If the Tax Credits are not to be syndicated, a letter from a third party certified public accountant establishing the Tax Credit factor.

(21) Utility allowance estimates. Current utility allowance estimates consistent with 26 CFR Section 1.42-10. The applicant must indicate which components of the utility allowance schedule apply to the project. For buildings that are using an energy consumption model utility allowance estimate, the estimate shall be calculated using the most recent version of the California Utility Allowance Calculator (CUAC) developed by the California Energy Commission (CEC), and incorporated in the CEC's compliance program (CBECC). The CUAC estimate shall be signed by a California Association of Building Energy Consultants

(CABEC) Certified Energy Analyst (CEA). Measures that are used in the CUAC that require field verification shall be verified by a certified HERS Rater, in accordance with current HERS regulations. Use of CUAC is limited to (i) new construction projects, (ii) rehabilitation projects applying for tax credits ~~for which the rehabilitation improves energy efficiency by at least 20%, as determined~~ consistent with the requirements of Section 10325(~~c~~f)(~~5~~7)(~~D~~A) ~~and (G), or installs solar generation that offsets 50% of tenant loads, as determined consistent with the requirements of Section 10325(c)(5)(G)~~, and (iii) existing tax credit projects with new photovoltaics installed ~~through a solar program administered by a municipal utility or joint powers authority~~, which offsets tenants' electrical load, and which includes site installation verification by a qualified HERS Rater. Projects utilizing the CUAC are approved for use upon the field verifications being completed. For projects using the CUAC where the field verification has not been completed prior to occupancy, the project must use an approved utility allowance source per 26 CFR Section 1.42-10 until the field verification is completed. Owners shall provide the tenants with a 90 day notification prior to the effective date with an informative summary about the current utility allowance and the proposed CUAC allowances before the utility allowances can be used in determining the gross rent of rent-restricted units. For projects applying for tax credits, the CUAC with supporting documentation shall be submitted in the Placed-in-service application required in Section 10322(i). ~~The CUAC and supporting documentation requires a quality control review and CTCAC approval following submission in the Placed-in-service application.~~ For existing tax credit projects not applying for tax credits, the CUAC with supporting documentation shall be submitted to CTCAC upon field verification completion for ~~a quality control review and~~ CTCAC approval. ~~CTCAC will submit modeled CUAC utility allowance estimates to a quality control reviewer and shall establish a fee to cover the costs for this review~~.

(22) Certification of subsidies. The applicant must certify as to the full extent of all Federal, State, and local subsidies which apply (or for which the taxpayer expects to apply) with respect to the proposed project. (IRC Section 42(m)(2)(C)(ii)) If rental assistance, operating subsidies or annuities are proposed, all related commitments that secure such funds must be provided. Tax-Exempt Bond Projects may receive a reservation of tax credits with the condition to provide the applicable subsidy commitment no later than the CDLAC bond issuance deadline. The source, monthly contract rent, annual amount (if applicable), term, number of units receiving assistance, and expiration date of each subsidy must be included.

(23) Cash flow projection. A 15-year projection of project cash flow. Separate cash flow projections shall be provided for residential and commercial space. If a capitalized rent reserve is proposed to meet the underwriting requirements of Section 10327, it must be included in the cash flow projections. Use of a capitalized rent reserve is limited to Special Needs projects, projects applying under the Non-profit Homeless Assistance set-aside, HOPE VI projects, and Section 8 project based projects.

(24) Self-scoring sheet as provided in the application.

(25) Acquisition Tax Credits application. Applicants requesting acquisition Tax Credits shall provide:

(A) a chain of title report or, for tribal trust land, an attorney's opinion regarding chain of title; and

(B) if applicable, an applicant statement that the acquisition is exempt from, or a third-party tax attorney's opinion stating that the acquisition meets the requirements of IRC Section 42(d)(2)(B)(ii) as to the 10-year placed-in-service rule; or,

(C) if a waiver of the 10-year ownership rule is necessary, a letter from the appropriate Federal official that states that the proposed project qualifies for a waiver under IRC Section 42(d)(6).

(26) Rehabilitation application. Applicants proposing rehabilitation of an existing structure shall provide:

(A) An independent, third-party appraisal prepared and submitted with the preliminary reservation application consistent with the guidelines in Section 10322(h)(9).

(B) A ~~Capital Needs Assessment (“~~CNA~~”)~~ performed within 180 days prior to the application deadline (except as provided in Section 10322(h)(35)) that details the condition and remaining useful life of the building’s major structural components, all necessary work to be undertaken and its associated costs, as well as the nature of the work, distinguishing between immediate and long-term repairs. The CNA~~apital Needs Assessment~~ shall also include a pre-rehabilitation 15-year reserve study, indicating anticipated dates and costs of future replacements of all current major building components. The CNA must be prepared by the project architect, as long as the project architect has no identity of interest with the developer, or by a qualified independent 3rd party who has no identity of interest with any of the members of the Development Team. An adaptive reuse application is not required to submit a CNA.

(27) Acquisition of Occupied Housing application. Applicants proposing acquisition of occupied rental residential housing shall provide all existing income, rent and family size information for the current tenant population.

(28) Tenant relocation plan. In addition to any other applicable relocation requirements, applicants proposing rehabilitation or demolition of occupied housing shall comply with the requirements of the California Relocation Assistance Law, California Government Code Section 7260 et seq, or, if the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 already applies to the project, pursuant to this federal law. Applicants shall provide an explanation of the relocation requirements that they are complying with, and a detailed relocation plan consistent with one of the above-listed relocation standards including an itemized relocation cost estimate that calculates the tenant relocation expenses required pursuant to the applicable California or federal relocation law. The relocation plan must also address the potential displacement of current tenants who do not meet the CTCAC income eligibility requirements or who will receive a rent increase exceeding five percent (5%). The relocation plan must include: a detailed description of proposed temporary onsite or offsite relocation and any corresponding relocation payments for tenants who meet CTCAC income eligibility requirements; an estimate of the number of current tenants who do not meet CTCAC income eligibility requirements or will receive a rent increase exceeding five percent (5%), how this estimate was determined, and the estimated relocation cost; and a detailed description of how the current tenants will be provided notice and information about the required relocation assistance, including copies of such noticing document(s).

(29) Owner-occupied Housing application. Applicants proposing owner-occupied housing projects of four units or less, involving acquisition or rehabilitation, shall provide evidence from an appropriate official substantiating that the building is part of a development plan of action sponsored by a State or local government or a qualified nonprofit organization (IRC Section 42(i)(3)(E)).

(30) Nonprofit Set-Aside application. Applicants requesting Tax Credits from the Nonprofit set-aside, as defined by IRC Section 42(h)(5), shall provide the following documentation with respect to each developer and general partner of the proposed owner:

(A) IRS documentation of designation as a 501(c)(3) or 501(c)(4) corporation;

(B) proof that one of the exempt purposes of the corporation is to provide low-income housing;

(C) a detailed description of the nonprofit participation in the development and ongoing operations of the proposed project, as well as an agreement to provide CTCAC with annual certifications verifying continued involvement;

(D) a third-party legal opinion verifying that the nonprofit organization is not affiliated with, controlled by, or party to interlocking directorates with any Related Party of a for-profit organization, and the basis for said determination; and,

(E) a third-party legal opinion certifying that the applicant is eligible for the Nonprofit Set-Aside pursuant to IRC Section 42(h)(5).

(31) Rural Set-Aside application. Applicants requesting Tax Credits from the Rural set-aside, as defined by H & S Code Section 50199.21 and Section 10315(c) of these regulations, shall provide verification that the proposed project is located in an eligible rural area. Evidence that project is located in an area eligible for Section 515 financing from RHS may be in the form of a letter from RHS's national process branch.

(32) RHS Section 514, 515, HOME or CDBG-DR program applications. Rural housing applicants requesting Tax Credits for projects financed by the RHS Section 514 or 515 program or from a HOME or CDBG-DR Participating Jurisdiction shall submit evidence from RHS, or the HOME or CDBG-DR Participating Jurisdiction that such funding has been committed, and such evidence shall meet the requirements of Section 10325(f)(8).

(33) Community service facility. An applicant requesting basis for a community service facility shall submit a third-party tax attorney's opinion stating that the community service facility meets the requirements of IRC Section 42(d)(4)(C). CTCAC may use its discretion in determining whether the community service facility meets the qualifications.

(34) Mixed housing types. An applicant proposing a project to include senior housing in combination with non-senior housing shall provide a third-party legal opinion stating that the project complies with ~~f~~Fair ~~h~~Housing ~~l~~Laws.

(35) Reapplication documents. Notwithstanding the time sensitive document requirements, the Committee may permit the site control title report and the CNA~~capital needs assessment report~~ of an unsuccessful application to be submitted, only once, in the reapplication cycle immediately following the unsuccessful application.

(i) Placed-in-service application. Within one year of the last building placed-in-service date for new construction projects and within one year of the rehabilitation completion date for rehabilitation projects, the project owner shall submit the documents listed below. If conversion to permanent financing has not taken place, documents (2), (5), (6), (12) and (15) below shall be submitted within 60 days of the permanent financing conversion date. A regulatory agreement provided by CTCAC shall be executed and recorded in the County Recorder's Office for which the project is located and the compliance monitoring fee shall be submitted upon request from CTCAC as required by Section 10335. For projects subject to a lease rider pursuant to Section 10337(a)(4), a lease rider shall be executed and recorded in the County Recorder's Office for which the project is located. CTCAC shall determine if all conditions of the reservation have been met. Changes subsequent to the initial application, particularly changes to the financing plan and costs or changes to the services amenities, must be explained by the project owner in detail. If all conditions have been met, tax forms will be issued, reflecting an amount of Tax Credits not to exceed the maximum amount permitted by these regulations. The following must be submitted:

(1) certificates of occupancy for each building in the project (or a certificate of completion for rehabilitation projects). If acquisition Tax Credits are requested, evidence of the placed-in-service date for acquisition purposes, and evidence that all rehabilitation is completed;

(2) an audited certification, prepared and signed by an independent Certified Public Accountant identified by name, under generally accepted auditing standards, with all disclosures and

notes. The Certified Public Accountant (CPA) or accounting firm shall not have acted a manner that would impair independence as established by the American Institute of Certified Public Accountants (AICPA) Code of Professional Conduct Section 101 and the Securities and Exchange Commission (SEC) regulations 17 CFR Parts 210 and 240. Examples of such impairing services, when performed for the final cost certification client, include bookkeeping or other services relating to the accounting records, financial information systems design and implementation, appraisal or evaluation services, actuarial services, internal audit outsourcing services, management functions or human resources, investment advisor, banking services, legal services, or expert services unrelated to the audit. Both the referenced SEC and AICPA rules shall apply to all public and private CPA firms providing the final audited cost certification. In order to perform audits of final cost certifications, the auditor must have a peer review of its accounting and auditing practice once every three years consistent with the AICPA Peer Review Program as required by the California Board of Accountancy for California licensed public accounting firms (including proprietors); and make the peer review report publicly available and submit a copy to CTCAC along with the final cost certification. If a peer review reflects systems deficiencies, CTCAC may require another CPA provide the final cost certification. This certification shall:

(A) as identified by the certified public accountant, reflect all costs, in conformance with 26 CFR § 1.42-17, and expenditures for the project up to the funding of the permanent loan as well as all sources and amounts of all permanent funding. Projects developed with general contractors who are Related Parties to the developer must be audited to the subcontractor level;

(B) include a CTCAC provided Sources and Uses form reflecting actual total costs incurred up to the funding of the permanent loan;

(C) certify that the CPA has not performed any services, as defined by AICPA and SEC rules, that would impair independence; and

(D) certify permanent financing conversion date

(3) an itemized breakdown of placed-in-service dates, shown separately for each building, on a Committee-provided form. If the placed-in service date(s) denoted are different from the date(s) on the certificate(s) of occupancy, a detailed explanation is required;

(4) photographs of the completed building(s);

(5) a request for issuance of IRS Form(s) 8609 and/or FTB Form(s) 3521A;

(6) a certification from the investor or syndicator of equity raised and syndication costs in a Committee-provided format;

(7) an updated application form;

(8) an owner-signed certification documenting the Supportive ~~s~~Services currently being provided to the residents, including identifying service provider(s), describing services provided, stating services dollar value, and stating services funding source(s) (cash or in-kind), with attached copies of contracts and MOUs for services;

(9) a copy of the project owner limited partnership agreement;

(10) a list of all amenities provided at the project site including any housing type requirements of Section 10325(h) committed to in the Tax Credit application, and color photographs of the amenities. If the list differs from that submitted at application, an explanation must be provided; housing type requirements must be completed. In addition, the project owner must provide a list of any project amenities not included in basis for which the property owner intends to charge an optional fee to residents;

(11) a description of any charges that may be paid by tenants in addition to rent, with an explanation of how such charges affect eligible basis;

(12) if applicable, a certification from a third-party tax professional stating the percentage of aggregate basis (including land) financed by tax exempt bonds for projects that received Tax Credits under the provisions of Section 10326 of these regulations;

(13) all applicable documentation required pursuant to the Compliance and Verification requirements of Sections 10325(c)(5), 10325(f)(7), ~~and~~ 10326(g)(6) and 10327(c)(5)(B);

~~(14) all documentation required pursuant to the Compliance and Verification requirements of Section 10327(c)(5)(B);~~

~~(15)~~(14) if seeking a reduction in the operating expenses used in the Committee's final underwriting pursuant to Section 10327(g)(1) of these regulations, the final operating expenses used by the lender and equity investor;

~~(16)~~(15) a certification from the project architect or, in the case of rehabilitation projects, from an architect retained for the purpose of this certification, that the ~~physical buildings~~design of the development ~~are~~is in compliance with all applicable Housing and Accessibility Requirements~~fair housing laws~~;

~~(17) all documentation required pursuant to the Compliance and Verification requirements of Section 10325(c)(5), if applicable;~~

~~(18)~~(16) evidence that the project is in compliance with any points received under Section 10325(c)(8);

~~(19)~~(17) a current utility allowance estimate as required by 26 CFR Section 1.42-10(c) and Section 10322(h)(21) of these regulations. Measures that are used in the CUAC that require field verification shall be verified by a certified HERS rater, in accordance with current HERS regulations; and

~~(20)~~(18) for tribal trust land, the lease agreement between the Tribe and the project owner.

~~(21)~~(19) ~~E~~evidence that the subject property is within the control of the project owner in the form of an executed lease agreement, a current title report within 90 days of application except as provided in section 10322(h)(35) (or preliminary title report, but not title insurance or commitment to insure) showing the project owner holds fee title, a grant deed, or, for tribal trust land, a title status report or an attorney's opinion regarding chain of title and current title status.

~~(22)~~(20) ~~E~~evidence that the project is in compliance with the provisions of the CDLAC resolution, if applicable.

~~(23)~~(21) ~~I~~if the application includes a legal separation or subdivision of a building that is not a condominium plan:

(A) a legal opinion of how the legal separation meets the IRS definition of a building. The opinion must include a summary of the common area and building access ownership structure and any shared use agreements; and

(B) if the project owners are proposing any kind of proportionate cost where there is a single common area owner, a tax attorney must provide an opinion on how proportioning a cost and corresponding eligible basis to an entity that does not own the space is permissible under IRS LIHTC and/or tax law. The opinion must include an estimated cost breakdown and the methodology for how these shared area costs were proportioned and is subject to review and approved by CTCAC.

~~(24)~~(22) For multiphase projects proposing to share use of common areas and community space, a joint use agreement must be provided in the placed in service application. In addition, if there is any kind of proportionate cost for common area and community space to a project that does not own the area/space, a tax attorney must provide an opinion of how apportioning a cost and corresponding eligible basis to an entity that does not own the area/space is permissible under IRS LIHTC and/or tax law. The opinion must include an estimated cost breakdown and the methodology for how these shared area costs were apportioned and is subject to review and approval by CTCAC.

The Executive Director may waive any of the above submission requirements if not applicable to the project.

(j) Revisions to 4% Reservations at Placed in Service. Proposals submitted under Section 10326 of these regulations do not require new applications for changes in costs or Tax Credits alone. Committee staff will adjust the Credit amount when the placed-in-service package is received and reviewed. Approval of the Executive Director is required for any change in unit mix or income targeting after reservation except for changes that result in deeper income targeting. It is the applicant's responsibility to notify CTCAC of any unit mix or income targeting change. Projects at placed-in-service that are requesting additional Tax Credits will be required to submit a fee equal to one percent (1%) of the increase from reservation in the annual federal tax credits allocated. This section shall apply to all projects for which CTCAC issues tax forms after December 31, 2017.

(k) Unless the proposed project is a Special Needs development, or within ten (10) years of an expiring tax credit regulatory agreement, applicants for nine percent (9%) Low Income Housing Tax Credits to acquire and/or rehabilitate existing tax credit properties still regulated by an extended use agreement shall:

(1) certify that the property sales price is no more than the current debt balance secured by the property, and

(2) be prohibited from receiving any tax credits derived from acquisition basis.

All applicants for Low-Income Housing Tax Credits to acquire and/or rehabilitate existing tax credit properties still regulated by an extended use agreement shall use all funds in the applicant project's replacement reserve accounts for rehabilitating the property to the benefit of its residents, except that an applicant may use existing reserves to reasonably meet CTCAC's or another funder's minimum reserve account requirement.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10323. The American Recovery and Reinvestment Act of 2009.

(a) General. The American Recovery and Reinvestment Act of 2009 was administered by CTCAC under regulations adopted October 22, 2009. Awards made under those prior regulations remain bound by the terms of related executed funding agreements, and regulatory agreements.

(b) Fees.

(1) No additional processing fees or performance deposits shall be collected from ARRA funding recipients beyond tax credit fees collected pursuant to Section 10335. Such tax credit fees must be paid by all ARRA fund recipients, including an allocation fee, even where an allocation of credits is not ultimately made. CTCAC may charge an ARRA funds recipient

an asset management fee for such services. This fee may be in the form of an annual charge during the project's regulatory term, or may be charged at or about project completion. In the event CTCAC contracts out for asset management services, the contracted entity may charge the sponsor an asset management fee directly.

(2) Asset management fees shall be $5,000 annually for projects of 30 units or fewer, and up to $7,500 annually for projects of 31 to 75 units. Projects containing more than 75 units, will pay up to $7,500 as a basic asset management fee annually, as well $40 per unit of every unit over 75 units. Project owners may pay a one-time asset management fee equal to the total fee over the 15-year period, or a partial one-time upfront fee. If making a partial payment, the remaining annual payments shall be discounted accordingly to assure an equal total payment to a pure annual payment schedule. Where another State or federal housing entity is a project funding source, project sponsors may propose a plan to CTCAC wherein that source shares asset management information with CTCAC. Sponsors may also propose a plan to CTCAC where a syndicator or investor providing professional asset management services to the project shares asset management information with CTCAC. If CTCAC determines that those asset management functions meet federal requirements, CTCAC may agree to accept that information and discount or forgo a fee altogether

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10325. Application Selection Criteria - Credit Ceiling Applications.

(a) General. All applications not requesting Federal Tax Credits under the requirements of IRC Section 42(h)(4)(b) and Section 10326 of these Regulations (for buildings financed by tax-exempt bonds) shall compete for reservations of Credit Ceiling amounts during designated reservation cycles. Further, ~~no~~ projects that have~~s~~ ~~a~~ pending applications for a private activity bond allocation or that have~~s~~ previously received ~~a~~ private activity bond allocations that have not been returned as of the application filing deadline ~~will~~are ~~be~~ ineligible to compete under the Credit Ceiling competition for Federal Tax Credits.

(b) Authority. Selection criteria shall include those required by IRC Section 42(m), H & S Code Section 50199.14, and R & T Code Sections 12206, 17058, and 23610.5.

(c) Credit Ceiling application competitions. Applications received in a reservation cycle, and competing for Federal and/or State Tax Credits, shall be scored and ranked according to the below-described criteria, except as modified by Section 10317(g) of these regulations. The Committee shall reserve the right to determine, on a case-by-case basis, under the unique circumstances of each funding round, and in consideration of the relative scores and ranking of the proposed projects, that a project's score is too low to warrant a reservation of Tax Credits. All point selection categories shall be met in the application submission through a presentation of conclusive, documented evidence to the Executive Director's satisfaction. Point scores shall be determined solely on the application as submitted, including any additional information submitted in compliance with these regulations. Further, a project's points will be based solely on the current year's scoring criteria and submissions, without respect to any prior year's score for the same projects.

Scattered Site Projects shall be scored proportionately in the site and service amenities category based upon (i) each site's score, and (ii) the percentage of units represented by each site, except that for scattered site projects of less than 20 Low-Income Units, service amenities shall be scored in the aggregate across all sites.

The number of awards received by individuals, entities, affiliates, and related entities is limited to no more than four (4) per competitive round. This limitation is applicable to a project applicant, developer, sponsor, owner, general partner, and to parent companies, principals of entities, and family members. For the purposes of this section, related or non-arm's length relationships are further defined as those having control or joint-control over an entity, having significant influence over an entity, or participating as key management of an entity. Related entity disclosure is required at the time of application. Furthermore, no application submitted by a sponsor may benefit competitively by the withdrawal of another, higher-ranked application submitted by the same sponsor or related parties as described above.

SCORING

(1) General Partner/Management Company Characteristics.

No one general partner, party having any fiduciary responsibilities, or related parties will be awarded more than 15% of the Federal Credit Ceiling, calculated as of February first during any calendar year unless imposing this requirement would prevent allocation of all of the available Credit Ceiling.

(A) General partner experience. To receive points under this subsection for projects in existence for more than three years, a proposed general partner, or a key person within the proposed general partner organization, must meet the following conditions:

(i) For projects in operation for more than three years, submit a certification from a third party certified public accountant that the projects for which it is requesting points have maintained a positive operating cash flow, from typical residential income alone (e.g. rents, rental subsidies, late fees, forfeited deposits, etc.) for the year in which each development's last financial statement has been prepared and have funded reserves in accordance with the partnership agreement and any applicable loan documents. To obtain points for projects previously owned by the proposed general partner, a similar certification must be submitted with respect to the last full year of ownership by the proposed general partner, along with verification of the number of years that the project was owned by that general partner. To obtain points for projects previously owned, the ending date of ownership or participation must be no more than 10 years from the application deadline. This certification must list the specific projects for which the points are being requested. The certification of the third party certified public accountant may be in the form of an agreed upon procedure report that includes funded reserves as of the report date, which shall be dated within 60 days of the application deadline, unless the general partner or key person has no current projects which are eligible for points in which case the report date shall be after the date from which the general partner or key person separated from the last eligible project. If the certification is prepared for a first-round application utilizing prepared financial statements of the previous calendar year, the certification may be submitted in a second round application, exceeding the 60 day requirement above. Where there is more than one general partner, experience points may not be aggregated; rather, points will be awarded based on the highest points for which 1 general partner is eligible.

Three to four projects in service more than three years, of which one shall be in service more than five years and two shall be California Low-Income Housing Tax Credit projects 5 points

Five or more projects in service more than three years, of which one shall be in service more than five years and two shall be California Low-Income Housing Tax Credit projects 7 points

For special needs housing type projects only applying through the Nonprofit set-aside or Special Needs set-aside only, points are available as described above or as follows:

Three Special Needs projects in service more than three years and one California Low-Income Housing Tax Credit project which may or may not be one of the three special needs projects 5 points

Four or more Special Needs projects in service more than three years and one California Low-Income Housing Tax Credit project which may or may not be one of the four special needs projects 7 points

(ii) General partners with fewer than two (2) active California Low Income Housing Tax Credit projects in service more than three years, and general partners for projects applying through the Nonprofit or Special Needs set-aside with no active California Low Income Housing Tax Credit projects in service more than three years, shall contract with a bona-fide management company currently managing two (2) California Low Income Housing Tax Credit projects in service more than three years and which itself earns a minimum total of two (2) points at the time of application.

(iii) Tribal applicants may contract with a developer who will not be a general partner and receive points commensurate with the developer's experience pursuant to clauses (i) and (ii). The contract shall be in effect at least until the issuance of 8609 tax forms. Tribal applicants exercising this option, including the option in the next paragraph, shall also contract for asset management for at least the term of the 15-year federal compliance period with an entity that has asset managed at least two Low-Income Housing Tax Credit projects for more than three years.

For purposes of this clause only, a developer may include an entity pre-approved by CTCAC that has developed but not owned the requisite number of projects described in (i) and that provides the certification from a third party certified public accountant described above for the projects for which experience points are requested. If the projects for which the entity requests experience points do not include two (2) active California Low Income Housing Tax Credit projects in service more than three years, the applicant shall contract with a bona-fide management company pursuant to clause (ii). For this purpose only, "develop" shall mean developing the project scope and timeline, securing financing, hiring or performing the services of a general contractor, and overseeing completion of construction and placement in service as well as asset managing the project for at least three years after placed in service. When seeking pre-approval the entity shall provide copies of contracts demonstrating that the standards have been met.

In applying for and receiving points in this category, applicants assure that the property shall be operated by a general partner in conformance with Section 10320(b).

(B) Management Company experience. To receive points under this subsection, the property management company must meet the following conditions. To obtain points for projects previously managed, the ending date of the property management role must be no more than 10 years from the application deadline. In addition, the property management experience with a project shall not pre-date the project's placed-in-service date.

(i) Six to 10 projects managed more than three years, of which two shall be California Low-Income Housing Tax Credit projects 2 points

11 or more projects managed more than three years, of which two shall be California Low-Income Housing Tax Credit projects 3 points

For special needs housing type projects only applying through the Nonprofit set-aside or Special Needs set-aside only, points are available as described above or as follows:

Two to three Special Needs projects managed more than three years and one California Low-Income Housing Tax Credit project which may or may not be one of the special needs projects 2 points

Four or more Special Needs projects managed more than three years and one California Low-Income Housing Tax Credit project which may or may not be one of the special needs projects 3 points

(ii) Management companies managing less than two (2) active California Low-Income Housing Tax Credit projects for more than three years, and management companies for projects requesting points under the special needs categories of subparagraph (i) above and managing no active California Low-Income Housing Tax Credit projects for more than three years, shall contract with a bona-fide management company currently managing two (2) California Low Income Housing Tax Credit projects for more than three years and which itself earns a minimum combined total of two (2) points at the time of application.

When contracting with a California-experienced property management company under the terms of paragraph (A)(ii) or (B)(ii) above, the general partner or property co-management entity must obtain training in: CTCAC ownership/management, project operations, on-site certification training in federal ~~f~~Fair ~~h~~Housing ~~l~~Law, and manager certification in IRS Section 42 program requirements from a CTCAC-approved, nationally recognized entity. Additionally, the experienced property management agent or an equally experienced substitute, must remain for a period of at least three years from the placed-in-service date (or, for ownership transfers, three years from the sale or transfer date) to allow for at least one (1) CTCAC monitoring visit to ensure the project is in compliance with IRC Section 42. Thereafter, the experienced property manager may transfer responsibilities to the remaining general partner or property management firm following formal written approval from CTCAC. In applying for and receiving points in these categories, applicants assure that the property shall be owned and managed by entities with equivalent experience scores for the entire 15-year federal compliance and extended use period, pursuant to Section 10320(b). The experience must include at least two (2) Low Income Housing Tax Credit projects in California in service more than three years.

Points in subsections (A) and (B) above will be awarded in the highest applicable category and are not cumulative. For points to be awarded in subsection (B), an enforceable management agreement executed by both parties for the subject application must be submitted at the time of application. “Projects” as used in subsections (A) and (B) means multifamily rental affordable developments of over 10 affordable units that are subject to a recorded regulatory agreement, or, in the case of housing on tribal lands, where federal HUD funds have been utilized in affordable rental developments. General Partner and Management Company experience points may be given based on the experience of the principals involved, or on the experience of municipalities or other nonprofit entities that have experience but have formed single-asset entities for each project in which they have participated, notwithstanding that the entity itself would not otherwise be eligible for such points. For qualifying experience, “principal” is defined as an individual overseeing the day-to-day operations of affordable rental projects as senior management personnel of the General Partner or property management company.

(2) Negative points. Negative points, up to a total of 10 for each project and/or each violation, may be given at the Executive Director's discretion for general partners, co-developers, management agents, consultants, guarantors, or any member or agent of the Development Team as described in Section 10322(h)(5). Notwithstanding the foregoing and (B) below, failure to meet the requirements of Section 10325(c)(7) shall result in rescission of the Tax Credit Reservation or negative points. Negative points may be assessed for items including, but not limited to:

(A) failure to utilize committed public subsidies identified in an application, unless it can be demonstrated to the satisfaction of the Executive Director that the circumstances were entirely outside of the applicant's control;

(B) failure to utilize Tax Credits within program time guidelines unless it can be demonstrated to the satisfaction of the Executive Director that the circumstances were entirely outside of the applicant's control;

(C) failure to submit the placed-in-service application by the deadline required in Section 10322(i);

(D) removal or withdrawal under threat of removal as general partner from a housing tax credit partnership;

(E) failure to provide physical amenities or services or any other item for which points were obtained (unless funding for a specific services program promised is no longer available);

(F) failure to correct serious noncompliance after notice and cure period within an existing housing tax credit project in California;

(G) serious, after a notice and cure period, or repeated failure to submit required compliance documentation for a housing Tax Credit project located anywhere;

(H) failure to perform a tenant income recertification upon the first anniversary following the initial move-in certification for all one hundred percent (100%) tax credit properties, or failure to conduct ongoing annual income certifications in properties with non-tax-credit units;

(I) material misrepresentation of any fact or requirement in an application;

(J) failure of a building to continuously meet the terms, conditions, and requirements received at its certification as being suitable for occupancy in compliance with state or local law, unless it is demonstrated to the satisfaction of the Executive Director that the circumstances were entirely outside the control of the owner;

(K) failure to submit a copy of the owner's completed 8609 showing the first year filing;

(L) failure to promptly notify CTCAC of a property management change or changing to a management company of lesser experience contrary to Section 10325(c)(1)(B);

(M) failure to properly notify CTCAC and obtain prior approval of Transfer Events, general partner changes, transfer of a Tax Credit project, or allocation of the Federal or State Credit;

(N) certification of site amenities, distances or service amenities that were, in the Executive Director's sole discretion, inaccurate or misleading;

(O) falsifying documentation of household income or any other materials to fraudulently represent compliance with IRC Section 42; or

(P) failure of American Recovery and Reinvestment Act (ARRA) funded projects to comply with Section 42, CTCAC regulations, or other applicable program requirements;

(Q) failure to provide required documentation of third-party verification of sustainable and energy efficient features.

(R) failure to correct serious noncompliance, including incorrect rents or income qualification, incorrect utility allowance, or other overcharging of residents. In assigning negative points, CTCAC shall consider the most recent monitoring results for each of the parties' projects in the most recent three-year monitoring cycle. CTCAC shall allow affected parties a reasonable period to correct serious noncompliance before assigning negative points. Negative points may be warranted when more than ten percent (10%) of the party's total portfolio has Level 3 deficiencies under the Uniform Physical Conditions Standards established by HUD. In addition, negative points may be warranted when more than ten percent (10%) of the tenant files most recently monitored resulted in findings of either household income above regulated income limits upon initial occupancy, or findings of gross rent exceeding the tax credit maximum limits.

(S) the project's total eligible basis at placed in service exceeding the revised total adjusted threshold basis limits for the year the project is placed in service by 40%.

(T) where CDLAC has determined that a person or entity is subject to negative points under its regulations, CTCAC will deduct an equal amount of points for an equal period of time from tax credit applications involving that person or entity or a Related Party.

(U) failure to comply with a requirement of the regulatory agreement or of a covenant entered into 10320(b)(2)(B) or Section 10337(a)(3)(B).

(V) ~~S~~submitting a check which CTCAC, after reasonable efforts to correct, cannot deposit.

~~(V)~~(W) Final decisions of any local, state, or federal regulatory or investigative body finding violations of the Housing and Accessibility Requirements or Fair Housing Laws.

Negative points given to general partners, co-developers, management agents, consultants, or any other member or agent of the Development Team may remain in effect for up to two calendar years, but in no event will they be in effect for less than one funding round. Furthermore, they may be assigned to one or more Development Team members, but do not necessarily apply to the entire Team. Negative points assigned by the Executive Director may be appealed to the Committee under appeal procedures enumerated in Section 10330.

(3) Housing Needs. (Points will be awarded only in one category listed below except that acquisition and/or rehabilitation Scattered Site Projects may, at the applicant's election, be scored either in the aggregate or proportionately based upon (i) each site's score, and (ii) the percentage of units represented by each site.) The category selected hereunder (which shall be the category represented by the highest percentage of Low-Income Units in a proportionally scored project) shall also be the project category for purposes of the tie-breaker described in subsection 10325(c)(9) below.

Large Family Projects	10 points
Special Needs Projects	10 points
Seniors Projects	10 points
At-Risk Projects	10 points

SRO Projects 10 points

(4) Amenities beyond those required as additional thresholds

(A) Site Amenities: Site amenities must be appropriate to the tenant population served. To receive points the amenity must be in place at the time of application except as specified in paragraphs 1, 5, and 8 below. In addition, an amenity to be operated by a public entity that is (i) being constructed within the project as part of the tax credit development, (ii) is receiving development funding for the amenity from the public entity, and (iii) has a proposed operations budget from the operating public entity, would be considered "in place" at the time of application. Distances must be measured using a standardized radius from the development site to the target amenity, unless that line crosses a significant physical barrier or barriers. Such barriers include highways, railroad tracks, regional parks, golf courses, or any other feature that significantly disrupts the pedestrian walking pattern between the development site and the amenity. The radius line may be struck from the corner of development site nearest the target amenity, to the nearest corner of the target amenity site. However, a radius line shall not be struck from the end of an entry drive or on-site access road that extends from the central portion of the site itself by 250 feet or more. Rather, the line shall be struck from the nearest corner of the site's central portion. Where an amenity such as a grocery store resides within a larger shopping complex or commercial strip, the radius line must be measured to the amenity exterior wall, rather than the site boundary. The resulting distance shall be reduced in such instances by 250 feet to account for close-in parking.

No more than 15 points will be awarded in this category. For purposes of the Native American apportionment only, no points will be awarded in this category. However, projects that apply under the Native American apportionment that drop down to the rural set-aside will be scored in this category. Applicants must certify to the accuracy of their submissions and will be subject to negative points in the round in which an application is considered, as well as subsequent rounds, if the information submitted is found to be inaccurate. For each amenity, color photographs, a contact person and a contact telephone must be included in the application. The Committee may employ third parties to verify distances or may have staff verify them. Only one point award will be available in each of the subcategories (1-9) listed below, with exception of the transit pass option of subcategory 1. Amenities may include:

1. Transit Amenities

The project is located where there is a bus rapid transit station, light rail station, commuter rail station, ferry terminal, bus station, or public bus stop within 1/3 mile from the site with service at least every 30 minutes (or at least two departures during each peak period for a commuter rail station or ferry terminal) during the hours of 7-9 a.m. and 4-6 p.m., Monday through Friday, and the project's density will exceed 25 units per acre. 7 points

The site is within 1/3 mile of a bus rapid transit station, light rail station, commuter rail station, ferry terminal, bus station, or public bus stop with service at least every 30 minutes (or at least two departures during each peak period for a commuter rail station or ferry terminal) during the hours of 7-9 a.m. and 4-6 p.m., Monday through Friday. 6 points

The site is within 1/2 mile of a bus rapid transit station, light rail station, commuter rail station, ferry terminal, bus station, or public bus stop with service at least every 30 minutes (or at least two departures during each peak period for a commuter rail station or ferry terminal) during the hours of 7-9 a.m. and 4-6 p.m., Monday through Friday. 5 points

The site is located within 1/3 mile of a bus rapid transit station, light rail station, commuter rail station, ferry terminal, bus station, or public bus stop. (For Rural set-aside projects, full points may be awarded where van or dial-a-ride service is provided to tenants, if costs of obtaining and maintaining the van and its service are included in the budget and the operating schedule is either on demand by tenants or a regular schedule is provided) 4 points

The site is located within 1/2 mile of a bus rapid transit station, light rail station, commuter rail station, ferry terminal, bus station, or public bus stop. 3 points

In addition to meeting one of the point categories described above, the applicant commits to provide to residents free transit passes or discounted passes priced at no more than half of retail cost. Passes shall be made available to each Low-Income Unit at the time a Low-Income Unit is leased to the tenant and shall be made available for at least 15 years. These points are not available for projects with van service. These points are only available to Rural set-aside projects with dial-a-ride service for free or discounted dial-a-ride passes.

At least one pass per Low-Income Unit 3 points
At least one pass per each 2 Low-Income Units 2 points

“Light rail station” or “commuter rail station” or “ferry terminal” includes a planned rail station or ferry terminal whose construction is programmed into a Regional or State Transportation Improvement Program to be completed within one year of the scheduled completion and occupancy of the proposed residential development.

A private bus or transit system providing service to residents may be substituted for a public system if it (a) meets the relevant headway and distance criteria, and (b) if service is provided free to the residents. Such private systems must receive approval from the CTCAC Executive Director prior to the application deadline. Multiple bus lines may be aggregated for the above points, only if multiple lines from the designated stop travel to an employment center. Such aggregation must be demonstrated to, and receive prior approval from, the CTCAC Executive Director in order to receive competitive points.

2. The site is within 1/2 mile of a public park or a community center accessible to the general public (1 mile for Rural set-aside projects). A public park shall not include 1) school grounds unless there is a bona fide, formal joint use agreement between the jurisdiction responsible for the parks/recreational facilities and the school district or private school providing availability to the general public of the school grounds and/or facilities, 2) greenbelts or pocket parks, or 3) open space preserves or biking parkways unless there is a trailhead or designated access point within the specified distance. 3 points

   or within 3/4 mile (1.5 miles for Rural set-aside projects) 2 points

3. The site is within 1/2 mile of a book-lending public library that also allows for inter-branch lending (when in a multi-branch system) (1 mile for Rural set-aside projects) 3 point

   or within 1 mile (2 miles for Rural set-aside projects) 2 points

4. The site is within 1/2 mile of a full-scale grocery store/supermarket of at least 25,000 gross interior square feet where staples, fresh meat, and fresh produce are sold (1 mile for Rural set-aside projects). A large multi-purpose store containing a grocery section may garner these points if the application contains the requisite interior measurements of the grocery section of that multipurpose

store. The "grocery section" of a large multipurpose store is defined as the portion of the store that sells fresh meat, produce, dairy, baked goods, packaged food products, delicatessen, canned goods, baby foods, frozen foods, sundries, and beverages. 5 points

or within 1 mile (2 miles for Rural set-aside projects) 4 points
or within 1.5 miles (3 miles for Rural set-aside projects) 3 points

The site is within 1/4 mile of a neighborhood market of 5,000 gross interior square feet or more where staples, fresh meat, and fresh produce are sold (1/2 mile for Rural Set-aside projects). A large multi-purpose store containing a grocery portion may garner these points if the application contains interior measurements of the grocery section of that multi-purpose store. The "grocery section" of a large multipurpose store is defined as the portion of the store primarily devoted to food stuffs that sells fresh meat, produce, dairy, baked goods, packaged food products, delicatessen, canned goods, baby foods, frozen foods, sundries, and beverages. 4 points

or within 1/2 mile (1 mile for Rural Set-aside projects) 3 points

The site is within 1/2 mile of a weekly farmers' market on the list of Certified Farmers' Markets maintained by the California Department of Food and Agriculture and operating at least 5 months in a calendar year 2 points

or within 1 mile 1 point

5. The site is within (1) mile of adult education campus of a school district, or community college (an additional 1/2 mile for Rural set-aside projects) 3 points

   For a development wherein at least 25 percent (25%) of the Low-Income Units (or, for Special Needs housing type, at least 25% of the Large Family Low-Income Units) shall be three-bedroom or larger units, the site is within 1/4 mile of a public elementary school; 1/2 mile of a public middle school; or one (1) mile of a public high school, (an additional 1/2 mile for each public school type for Rural set-aside projects) and that the site is within the attendance area of that school or campus. 3 points

   or within an additional 1/2 mile for each public-school type (an additional 1 mile for Rural set-aside projects) 2 points

   Public schools demonstrated, at the time of application, to be under construction and to be completed and available to the residents prior to the housing development completion are considered in place at the time of application for purposes of this scoring factor.

6. For a Senior Development, the site is within 1/2 mile of a daily operated senior center or a facility offering daily services specifically designed for seniors (not on the development site) (1 mile for Rural set-aside projects) 3 points

   or within 3/4 mile (1.5 miles for Rural set-aside projects) 2 points

7. For a Special Needs development, the site is located within 1/2 mile of a facility that operates to serve the population living in the development 3 points

   or within 1 mile 2 points

8. The site is within 1/2 mile (for Rural set-aside projects, 1 mile) of a qualifying medical clinic with a physician, physician's assistant, or nurse practitioner onsite

for a minimum of 40 hours each week, or hospital (not merely a private doctor's office). A qualifying medical clinic must accept Medi-Cal payments, or Medicare payments for Senior Projects, or Health Care for the Homeless for projects housing homeless populations, or have an equally comprehensive subsidy program for low-income patients. 3 points

The site is within 1 mile (for Rural set-aside projects, 1.5 miles) of a qualifying medical clinic with a physician, physician's assistant, or nurse practitioner onsite for a minimum of 40 hours each week, or hospital 2 points

A hospital demonstrated at the time of application to be under construction and to be completed and available to the residents prior to the housing development completion is considered in place at the time of application for purposes of this scoring factor.

9. The site is within 1/2 mile of a pharmacy (for Rural projects, 1 mile) 2 points

   or within 1 mile (2 miles for Rural projects) 1 point

10. High speed internet service, with a minimum average download speed of 25 megabits/second must be made available to each Low-Income Unit for a minimum of 15 years, free of charge to the tenants, and available within 6 months of the project's placed-in-service date. Documentation of internet availability must be included in the application. If internet is selected as an option in the application it must be provided even if it is not needed for points.
    2 points (3 points for Rural projects)

11. The project is a new construction Large Family housing type project, except for an inclusionary project as defined in Section 10325(c)(9)(C), and the site is located in a census tract, or census block group as applicable, designated on the CTCAC/HCD Opportunity Area Map as Highest or High Resource:
    8 points

    An application for a large family new construction project located in a High or Highest Resource area shall disclose whether or not the project includes any Low-Income Units that satisfy the obligations of an affordable housing ordinance or development agreement with the jurisdiction in which the project will be built and, if so, the number of such units and whether the contractual obligations derive solely from the Low-Income Units themselves.

    An applicant may choose to utilize the census tract, or census block group as applicable, resource designation from the CTCAC/HCD Opportunity Maps in effect when the initial site control was obtained up to seven calendar years prior to the application.

(B) Projects that provide high-quality services designed to improve the quality of life for tenants are eligible to receive points for service amenities. Services must be appropriate to meet the needs of the tenant population served and designed to generate positive changes in the lives of tenants, such as by increasing tenant knowledge of and access to available services, helping tenants maintain stability and prevent eviction, building life skills, increasing household income and assets, increasing health and well-being, or improving the educational success of children and youth.

Except as provided below, in order to receive points in this category, physical space for service amenities must be available when the development is placed-in-service. Services space must be located inside the project and provide sufficient square footage, accessibility and privacy to accommodate the proposed services. Evidence that adequate physical space for services will be provided must be documented within the application.

The amenities must be available within six months of the project's placed-in-service date. Applicants must commit that services shall be provided for a period of 15 years.

All services must be of a regular and ongoing nature and provided to tenants free of charge (except for day care services or any charges required by law). Services must be provided on-site except that projects may use off-site services within 1/2 mile of the development (1½ miles for Rural set-aside projects) provided that they have a written agreement with the service provider enabling the development's tenants to use the services free of charge (except for day care and any charges required by law) and that demonstrate that provision of on-site services would be duplicative.

No more than 10 points will be awarded in this category. The number of hours per year for a full time-equivalent (FTE) will be calculated as follows: 1) the number of bedrooms multiplied by 2080 = FTE numerator; 2) FTE numerator divided by base number of bedrooms = number of required hours per year (up to a maximum of 2,080 hours).

For Large Family, Senior, and At-Risk Projects or for the non-Special Needs units in a Special Needs Project with less than 75% Special Needs units, amenities may include, but are not limited to:

1. Service Coordinator. Responsibilities must include, but are not limited to: (a) providing tenants with information about available services in the community, (b) assisting tenants to access services through referral and advocacy, and (c) organizing community-building and/or other enrichment activities for tenants (such as holiday events, tenant council, etc.).

   Minimum ratio of one Full Time Equivalent (FTE) Service Coordinator to 600 bedrooms. 5 points

2. Other Services Specialist. Must provide individualized assistance, counseling and/or advocacy to tenants, such as to assist them to access education, secure employment, secure benefits, gain skills or improve health and wellness. Includes, but is not limited to: Vocational/Employment Counselor, ADL or Supported Living Specialist, Substance Abuse or Mental Health Counselor, Peer Counselor, Domestic Violence Counselor.

   Minimum ratio of one FTE Services Specialist to 600 bedrooms. 5 points

3. Instructor-led adult educational, health and wellness, or skill building classes. Includes, but is not limited to: Financial literacy, computer training, home-buyer education, GED classes, and resume building classes, ESL, nutrition class, exercise class, health information/awareness, art class, parenting class, on-site food cultivation and preparation classes, and smoking cessation classes. Drop-in computer labs, monitoring or technical assistance shall not qualify.

   84 hours of instruction per year (42 for small developments) 7 points

   60 hours of instruction per year (30 for small developments) 5 points

4. Health and wellness services and programs. Such services and programs shall provide individualized support to tenants (not group classes) and need not be provided by licensed individuals or organizations. Includes, but is not limited to visiting nurses programs, intergenerational visiting programs, or senior companion programs. The application must describe in detail the services to be provided.

   100 hours of services per year for each 100 bedrooms 5 points

   60 hours of services per year for each 100 bedrooms 3 points

5. Licensed childcare. Shall be available 20 hours or more per week, Monday through Friday, to residents of the development. (Only for large family projects or other projects in which at least 25% of Low-Income Units are three bedrooms or larger). 5 points

6. After school program for school age children. Includes, but is not limited to tutoring, mentoring, homework club, art and recreational activities. (Only for large family projects or other projects in which at least 25% of Low-Income Units are three bedrooms or larger).

   10 hours per week, offered weekdays throughout school year 5 points

   6 hours per week, offered weekdays throughout school year 3 points

For Special Needs Projects with 75% or more Special Needs units, for the Special Needs units in a Special Needs Project with less than 75% Special Needs units, or SRO Projects, amenities may include, but are not limited to:

7. Case Manager. Responsibilities must include (but are not limited to) working with tenants to develop and implement an individualized service plan, goal plan or independent living plan.

   Ratio of one FTE case manager to 100 bedrooms 5 points

8. Service Coordinator or Other Services Specialist. Service coordinator responsibilities shall include, but are not limited to: (a) providing tenants with information about available services in the community, (b) assisting tenants to access services through referral and advocacy, and (c) organizing community-building and/or other enrichment activities for tenants (such as holiday events, tenant council, etc.). Other services specialist must provide individualized assistance, counseling and/or advocacy to tenants, such as to assist them to access education, secure employment, secure benefits, gain skills or improve health and wellness. Includes, but is not limited to: Vocational/Employment Counselor, ADL or Supported Living Specialist, Substance Abuse or Mental Health Counselor, Peer Counselor, Domestic Violence Counselor.

   Ratio of one FTE service coordinator or specialist to 360 bedrooms 5 points

9. Adult educational, health and wellness, or skill building classes. Includes, but is not limited to: Financial literacy, computer training, home-buyer education, GED classes, and resume building classes, ESL, nutrition class, exercise class, health information/awareness, art class, parenting class, on-site food cultivation and preparation classes, and smoking cessation classes.

84 hours of instruction per year (42 for small developments) 5 points

10. Health or behavioral health services provided by appropriately-licensed organization or individual. Includes but is not limited to: health clinic, adult day health center, medication management services, mental health services and treatment, substance abuse services and treatment. 5 points

11. Licensed childcare. Shall be available 20 hours or more per week, Monday through Friday, to residents of the development. (Only for large family projects or other projects in which at least 25% of Low-Income Units are three bedrooms or larger). 5 points

12. After school program for school age children. Includes, but is not limited to tutoring, mentoring, homework club, art and recreational activities. (Only for large family projects or other projects in which at least 25% of Low-Income Units are three bedrooms or larger).

    10 hours per week, offered weekdays throughout school year 5 points

Special needs projects with less than 75% special needs units shall be scored proportionately in the service amenity category based upon (i) the services provided to special needs and non-special needs units, respectively; and (ii) the percentage of units represented by special needs and non-special needs units, respectively. Proportionate scoring means for a project to score the maximum 10 points, nonspecial needs units and special needs units must independently score 10 points for service amenities. For special needs projects with less than 75% special needs units that provide the same service amenity for the special needs and non-special needs tenants, the applicant must select the amenity from 1-6 and from 7-12 in the application form. Special needs projects with 75% or more but less than 100% special needs units shall demonstrate that all tenants will receive an appropriate level of services.

Items 1 through 12 are mutually exclusive: one proposed service may not receive points under two different categories, except in the case of proportionately-scored scored services pursuant to the previous paragraph.

Documentation must be provided for each category of services for which the applicant is claiming service amenities points and must state the name and address of the organization or entity that will provide the services; describe the services to be provided and the number of hours services will be provided; and name the project to which the services are being committed.

Documentation shall take the form of a contract for services, Memorandum of Understanding (MOU), or commitment letter on agency letterhead.

For projects claiming points for items 1, 2, 7, or 8, a position description must be provided. Services delivered by the on-site Property Manager or other property management staff will not be eligible for points under any category (items 1 through 12).

The application's Service Amenity Sources and Uses Budget page must clearly describe all anticipated income and expenses associated with the services program(s) and must align with the services commitments provided (i.e. contracts, MOUs, letters, etc.). Applications shall receive points for services only if the proposed services budget adequately accounts for the level of service. The budgeted amount must be reasonably expected to cover the costs of the proposed level of service. If project operating income will fund service amenities, the application's Service Amenities Sources and Uses Budget must be consistent with the application's fifteen year pro forma. Services costs contained in the project's pro forma operating budget do not count towards meeting CTCAC's minimum operating expenses required by Section 10327(g)(1).

All organizations providing services for which the project is claiming points must document that they have at least 24 months of experience providing services to the project's target population. Experience of individuals may not be substituted for organizational experience.

(5) Reserved.

(6) Lowest Income in accordance with the table below — Maximum 52 points

(A) The "Percent of AMI~~rea Median Income~~" category may be used only once. For instance, 50% of Low-Income Units at 50% of AMI~~rea Median Income~~ cannot be used twice for 100% at 50% and receive 50 points, nor can 50% of Low-Income Units at 50% of AMI~~rea Median Income~~ for 25 points and 40% of Low-Income Units at 50% of AMI~~rea Median Income~~ be used for an additional 20 points. However, the "Percent of Low-Income Units" may be used multiple times. For example, 50% of Low-Income Units at 50% of AMI~~rea Median Income~~ for 25 points may be combined with another 50% of Low-Income Units at 45% of AMI~~rea Median Income~~ to achieve the maximum points. All projects must score at least 45 points in this category to be eligible for 9% Tax Credits.

Only projects competing in the Rural set aside may use the 55% of AMI~~rea Median Income~~ column.

Projects electing the average income federal set-aside must choose targeting in 10% increments of AMI~~rea Median Income~~ (i.e. 20% AMI, 30% AMI, 40% AMI, etc.).

Lowest Income Points Table (maximum 50 points):

		Percent of AMI~~rea Median Income~~						
		55%	**50%**	**45%**	**40%**	**35%**	**30%**	**20%**
	50%		25.0*	37.5				
	45%		22.5*	33.8				
Percent of	**40%**	10.0*	20.0	30.0				
Low-Income	**35%**	8.8*	17.5	26.3	35.0		50.0	
Units	**30%**	7.5*	15.0	22.5	30.0	37.5	45.0	
	25%	6.3*	12.5	18.8	25.0	31.3	37.5	50.0
	20%	5.0*	10.0	15.0	20.0	25.0	30.0	40.0
	15%	3.8*	7.5	11.3	15.0	18.8	22.5	30.0
	10%	2.5*	5.0	7.5	10.0	12.5	15.0	20.0

*Available to Rural set-aside projects only

(B) A project that agrees to have at least ten percent (10%) of its Low-Income Units available for tenants with incomes no greater than thirty percent (30%) of area median, and to restrict the rents on those units accordingly, will receive two points in addition to other points received under this subsection. The 30% units must be spread across the various bedroom-count units, starting with the largest bedroom-count units (e.g. four bedroom units), and working down to the smaller bedroom-count units, assuring that at least 10% of the larger units are proposed at 30% of AMI~~area median income~~. So long as the applicant meets the 10% standard projectwide, the 10% standard need not be met among all of the smaller units. The CTCAC Executive ~~d~~Director may correct applicant errors in carrying out this largest-to-smallest unit protocol. (These points may be obtained by using the 30% section of the matrix.)

All projects, except those applying under section 10326 of these regulations, will be subject to the minimum low income percentages chosen for a period of 55 years (50 years for projects located on tribal trust land), unless they receive Federal Tax Credits only and are intended for eventual tenant homeownership, in which case they must submit, at application, evidence of a financially feasible program, incorporating, among other items, an exit strategy, home ownership counseling, funds to be set aside to assist tenants in the purchase of units, and a plan for conversion of the facility to home ownership at the end of the initial 15 year compliance period. In such a case, the regulatory agreement will contain provisions for the enforcement of such covenants.

(7) Readiness to Proceed. 10 points will be available to projects that document enforceable financing commitment(s) as defined in Section 10325(f)(3) for all construction financing and demonstrate construction can commence within 180 days or 194 days of the Credit Reservation as assigned by the Executive Director and documented by the requirements below.

No later than the assigned deadline, CTCAC must receive:

(A) a completed updated application form along with a detailed explanation of any changes from the initial application,

(B) an executed construction contract,

(C) recorded deeds of trust for all construction financing (unless a project's location on tribal trust land precludes this), binding commitments for permanent financing, binding commitments for any other financing required to complete project construction,

(D) a limited partnership agreement executed by the general partner and the investor providing the equity,

(E) an updated CTCAC Attachment 16,

(F) issuance of building permits (a grading permit does not suffice to meet this requirement except that in the event that the city or county as a rule does not issue building permits prior to the completion of grading, a grading permit shall suffice; if the project is a design-build project in which the city or county does not issue building permits until designs are fully complete, the city or county shall have approved construction to begin) or the applicable tribal documents, and

(G) notice to proceed delivered to the contractor.

The Executive Director shall either rescind the Tax Credit Reservation, assess negative points, or both for failure to meet the assigned due date.

If no construction lender is involved, evidence must be submitted no later than the assigned due date, after the Reservation is made that the equity partner has been admitted to the ownership entity, and that an initial disbursement of funds has occurred. CTCAC shall conduct a financial feasibility and cost reasonableness analysis upon receiving submitted Readiness documentation.

In the event of a federally declared emergency by the President of the United States, a state declared emergency by the Governor of the State of California, or similar event determined by the Committee, and at the sole discretion of the Executive Director, extensions may be granted.

(8) Miscellaneous Federal and State Policies Maximum 2 points

(A) Credit Substitution. For applicants who agree to both 1) exchange Federal Tax Credits for State Tax Credits pursuant to Section 10317(e) and 2) exchange State Tax Credits for Federal Tax Credits pursuant to Section 10317(c). 2 points

Applicants receiving these points agree to make the exchange in a manner that yields equal equity based solely on the tax credit factors stated in the application.

(B) Enhanced Accessibility and Visitability. Project design incorporates accessibility provisions of the Housing and Building Accessibility Requirements~~California Building Code Chapter 11(B)~~ and the principles of Universal Design in at least half of the project's Low-Income Units, ~~by~~ including:

- Accessible routes of travel to the dwelling units with accessible 34" minimum clear-opening-width entry, and 34" clear width for all doors on an accessible path.
- Interior doors with lever hardware and 42" minimum width hallways.
  Fully accessible bathrooms complying with ~~California Building Code (~~CBC~~)~~ ~~Chapter 11(A) and~~ 11~~(~~B~~)~~. In addition, a 30"x48" clearance parallel to and centered on the bathroom vanity.
- Accessible kitchens with 30"x48" clearance parallel to and centered on the front of all major appliances and fixtures (refrigerator, oven, dishwasher and sink)
- Accessible ~~master~~primary bedroom size shall be at least 120 square feet (excluding the closet), shall accommodate a queen size bed, shall provide 36" in clearance around three sides of the bed, and shall provide required accessible clearances, free of all furnishings, at bedroom and closet doors. The ~~master~~primary bedroom closet shall be on an accessible path.
- Wiring for audio and visual doorbells required by UFAS shall be installed.
- Closets and balconies shall be located on an accessible route.
- These units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project consistent with 24 CFR Section 8.26.
- Applicant must commit to obtaining certification from a CASp or architect with demonstrated experience meeting federal accessibility requirements~~confirmation from a Certified Accessibility Specialist that the above requirements have been met~~. 2 points

(C) Smoke Free Residence. The proposed project commits to having at least one nonsmoking building and incorporating the prohibition into the lease agreement for the affected units. If the proposed project contains only one building, the proposed project shall commit to prohibiting smoking in designated contiguous units and incorporating the prohibition into the lease agreement for the affected units.
2 points

(D) Historic Preservation. The project proposes to use Historic Tax Credits 1 point

(E) Revitalization Area Project. The project is located within one of the following: a Qualified Census Tract (QCT), a census tract in which at least 50% of the households have an income of less than 60% of the AMI~~area median income~~, or a federal Promise Zone. Additionally, the development must contribute to a concerted community revitalization plan as demonstrated by a letter from a local government official. The letter must delineate the various community revitalization efforts, funds committed or expended in the previous five years, and how the project would contribute to the community's revitalization. 2 points

(F) Eventual Tenant Ownership. The project proposes to make Tax Credit Units available for eventual tenant ownership and provides the information described in Section 10325(c)(6) of these regulations. 1 point

(G) Utilizing Excess State-Owned Land: Projects located on land designated as excess state land pursuant to Executive Order N-06-19. 2 points

(9) Tie Breakers

If multiple applications receive the same score, the following tie breakers shall be employed:

For applications for projects within single-jurisdiction regional competitions only (the City and County of San Francisco and the City of Los Angeles geographic apportionments), the first tiebreaker shall be the presence within the submitted application of a formal letter of support for the project from either the San Francisco Mayor's Office of Housing or the Los Angeles Housing Department respectively. Within those cities, and for all other applications statewide, the subsequent tiebreakers shall be as follows:

First, if an application's housing type goal has been met in the current funding round in the percentages listed in section 10315, then the application will be skipped (unless the application to be skipped is the highest ranked in the set-aside, Native American apportionment, or geographic region) if there is another application with the same score and with a housing type goal that has not been met in the current funding round in the percentages listed in section 10315; and

Second, the highest of the sum of the following:

(A) Leveraged soft resources, as described below, defraying residential costs to total residential project development costs. Except where a third-party funding commitment is explicitly defraying non-residential costs only, leveraged soft resources shall be discounted by the proportion of the project that is non-residential. Leveraged soft resources shall be demonstrated through documentation including but not limited to funding award letters, committed land donations, or documented project-specific local fee waivers.

Leveraged soft resources shall include all of the following:

(i) Public funds. "Public funds" include federal, tribal, state, or local government funds, including the outstanding principal balances of prior existing public debt or subsidized debt that has been or will be assumed in the course of an acquisition/rehabilitation transaction, except that outstanding principal balances for projects subject to an existing CTCAC regulatory agreement shall not be considered public funds if such loans were funded less than 30 years prior to the application deadline. Outstanding principal balances shall not include any accrued interest on assumed loans even where the original interest has been or is being recast as principal under a new loan agreement. Public funds shall include assumed principal balances only upon documented approval of the loan assumption or other required procedure by the public agency holding the promissory note.

In addition, public funds include funds already awarded under the Affordable Housing Program of the Federal Home Loan Bank (AHP), waivers resulting in quantifiable cost savings that are not required by federal or state law, local government fee reductions established in ordinance and not required by federal or state law that are available only to rental affordable housing for lower-income households and affordable ownership housing for moderate income households, or the value of land and improvements donated or leased by a public entity or donated as part of an affordable housing ordinance, development agreement or legally enforceable mandate that is negotiated between a public entity and an unrelated private developer. The value of land leased by a public entity shall be discounted by the sum of up-front lease pre-payments and all mandatory lease payments in excess of $100 per year over the term of the lease, exclusive of residual receipt payments. For new construction applications, only the vacant land value may be counted for tiebreaker credit. The value of improvements to be demolished does not qualify as a leveraged soft resource. Private loans that are guaranteed by a public entity (for example, RHS Section 538 guaranteed financing) shall not be counted as public funds, unless the loans have a designated repayment commitment from a public source other than rental or operating subsidies, such as the HUD Title VI Loan Guarantee Program involving Native American Housing Assistance and Self Determination Act (NAHASDA) funds. Land and building values, including for land donated or leased by a public entity or donated as part of an affordable housing ordinance, development agreement or legally enforceable mandate, must be supported by an independent, third-party appraisal consistent with the guidelines in Section 10322(h)(9). The appraised value is not to include off-site improvements. For Tribal apportionment applications, donated land value and land-purchase funding shall not be eligible. However, unsuccessful Tribal apportionment applicants subsequently competing within the rural set-aside or tribal applicants competing in a geographic region shall have such donated land value and land-purchase funding counted competitively as public funding if the land value is established in accordance with the requirements of this paragraph.

Loans must be “soft” loans, having terms (or remaining terms) of at least 15 years, and below market interest rates and interest accruals, and are either fully deferred or require only residual receipts payments for at least the first fifteen years of their terms. Qualified soft loans may have annual fees that reasonably defray compliance monitoring and asset management costs associated with the project. The maximum below-market interest rate allowed for tiebreaker purposes shall be the greater of four percent (4%) simple, or the Applicable Federal Rate if compounding. RHS Section 514 or 515 financing shall be considered soft debt in spite of a debt service requirement. Further, there shall be conclusive evidence presented that any new public funds have been firmly committed to the proposed project and require no further approvals, and that there has been no consideration other than the proposed housing given by anyone connected to the project, for the funds or the donated or leased land. Seller carryback financing and any portion of a loan from a public seller or related party that is less than or equal to sale proceeds due the seller, except for a public land loan to a new construction project that is not replacing affordable housing within the footprint of the original development, shall be excluded for purposes of the tiebreaker. Projects that include both new construction and rehabilitation or affordable housing replacement shall have the land loan value prorated based on units.

Public contributions of off-site costs shall not be counted competitively, unless (1) documented as a waived fee pursuant to a nexus study and relevant State Government Code provisions regulating such fees or (2) the off-sites must be developed by the sponsor as a condition of local approval and those off-sites consist solely of utility connections, and curbs, gutters, and sidewalks immediately bordering the property. Public funds shall be reduced for tie breaker scoring purposes by an amount equal to the off-sites not meeting the requirements noted in this paragraph.

The capitalized value of rent differentials attributable to public rent or public operating subsidies shall be considered public funds based upon CTCAC underwriting standards. Standards shall include a 15-year loan term; an interest rate established annually by CTCAC based upon a spread over 10-year Treasury Bill rates; a 1.15 to 1 debt service coverage ratio; and a five percent (5%) vacancy rate. In addition, the rental income differential for subsidized units shall be established by subtracting tax credit rental income at 40 percent (40%) AMI levels (30% AMI for units subject to the 40% average AMI requirement of Section 10325(g)(3)(A)) from the committed contract rent income documented by the subsidy source or, in the case of a USDA rental subsidy only, the higher of 60% AMI rents or the committed contract USDA Basic rents. The committed contract rent income for units with existing project-based Section 8 rental subsidy shall be documented by the current monthly contract rent in place at the time of the application or by contract rent committed to and approved by the subsidy source (HUD); rent from a rent comparable study or post-rehabilitation rent shall not be permitted. The rent differential for projects with public operating subsidies shall equal the annual subsidy amount in year 1, provided the subsidy will be of a similar amount in succeeding years, or the aggregate subsidy amount of the contract divided by the number of years in the contract if the contract does not specify an annual subsidy amount.

(ii) soft loans that meet the criteria described in subparagraph (i) (except that terms shall be of at least 55 years), or grants, from unrelated non-public parties that are not covered by subparagraph (i) and that do not represent financing available through the National Mortgage Settlement Affordable Rental Housing Consumer Relief programs. The party providing the soft loans or grants shall not be a partner or proposed partner in the limited partnership (unless the partner has no ownership interest and only the right to complete construction) and shall not receive any benefit or funds from a related party to the project. The application shall include (1) a certification from an independent Certified Public Accountant (CPA) or independent tax attorney that the leveraged soft resource(s) is from an unrelated non-public entity(ies), that the unrelated non-public entity(ies) shall not receive any benefit or funds from a related party to the project, and that the leveraged soft resource(s) is available and not committed to any other project or use; and (2) a narrative from the applicant regarding the nature and source of the leveraged soft resource(s) and the conditions under which it was given. Seller carryback financing and any portion of a loan from a non-public seller or related party that is less than or equal to sale proceeds due the seller shall be excluded for purposes of the tiebreaker.

(iii) the value of donated land and improvements that are not covered by subparagraph (i), that meet the criteria described in subparagraph (i), and that are contributed by an unrelated entity (unless otherwise approved by the Executive Director), so long as the contributed asset has been held by the entity for at least five years prior to the application due date, except for the value of donated land and improvements in the case of a rehabilitation project subject to an existing regulatory agreement with CTCAC or a federal, state, or local public entity or with greater than 25% of the units receiving project-based rental assistance unless the land and improvements are wholly donated. For a case in which the donor is a non-profit organization acting solely as a pass-through entity, the Executive Director may in advance of the application date approve an exception to the five-year hold rule provided that the donor to the non-profit organization held the contributed asset for at least five years and that both the original donor and non-profit donor meet the requirements of, and are included in the certifications required by, this paragraph. The party providing the donation shall not be a partner or proposed partner in the limited partnership (unless the partner has no ownership interest and only the right to complete construction) and shall not receive any benefit from a related party to the project. In addition, the land shall not have been owned previously by a related party or a partner or proposed partner (unless the partner has no ownership interest and only the right to complete construction). The application shall include a certification from an independent Certified Public Accountant (CPA) or independent tax attorney that the donation is from an unrelated entity and that the unrelated entity shall not receive any benefit from a related party to the project. For new construction applications, only the vacant land value may be counted for tiebreaker credit. The value of improvements to be demolished does not qualify as a leveraged soft resource.

(iv) For purposes of this section, a related party shall mean a member of the development team or a Related Party, as defined in Section 10302, to a member of the development team.

(v) For 4% credit applications, recycled private activity bonds (whether they be used for construction or permanent financing or both) shall be considered leveraged soft resources so long as the loan terms are consistent with market standards.

Permanent funding sources for this tiebreaker shall not include equity commitments related to the Low-Income Housing Tax Credits.

Land donations include land leased for a de minimis annual lease payment. CTCAC may contract with an appraisal reviewer and, if it does so, shall commission an appraisal review for donated land and improvements if a reduction of 15% to the submitted appraisal value would change an award outcome. If the appraisal review finds the submitted appraisal to be inappropriate, misleading, or inconsistent with the data reported and with other generally known information, then the reviewer shall develop ~~his or her~~their own opinion of value and CTCAC shall use the opinion of value established by the appraisal reviewer for calculating the tiebreaker only.

The numerator of projects of 50 or more newly constructed or adaptive reuse Tax Credit Units shall be multiplied by a size factor equal to seventy five percent plus the total number of newly constructed or adaptively reused Tax Credit Units divided by 200 (75% + (total new construction/adaptive reuse units/200)). The size factor calculation shall be limited to no more than 150 Tax Credit Units.

In the case of a new construction Hybrid 9% and 4% tax credit development which meets all of the following conditions, the calculation of the size factor for the 9% application shall include all of the Tax Credit Units in the 4% application up to the limit described above, the leveraged soft resources ratio calculated pursuant to this subparagraph (A) shall utilize the combined amount of leveraged soft resources defraying residential costs and the combined total residential project development costs from both the 9% and 4% applications, and the ratio calculated pursuant to subparagraph (B) shall also utilize the combined total residential project development costs from both the 9% and 4% applications:

(i) the 4% application shall have been submitted to CTCAC and CDLAC by the 9% application deadline;

(ii) the 4% and 9% projects are simultaneous phases, as defined in Section 10327(c)(2)(C);

(iii) the 4% application is eligible for maximum points under Sections 10325(c)(3), (4)(B), (5), and (6), except that 1) the 4% application may be eligible for maximum points in the lowest income category in combination with the 9% project, and 2) the 4% application may be eligible for maximum housing type points in combination with the 9% project. Under each exception, the 9% project shall also be scored in the corresponding point category in combination with the 4% project; and

(iv) developers shall defer or contribute as equity to the project any amount of combined 4% and 9% developer fees in cost that are in excess of the limit pursuant to Section 10327(c)(2)(A) plus $20,000 per unit for each Tax Credit Unit in excess of 100, using (a) the combined Tax Credit Units of the 9% and 4% components, (b) the combined eligible basis of the 9% and 4% components, and (c) the high-cost test factor calculated using the eligible basis and threshold basis limits for the 9% component.

In the event that the 4% component of a Hybrid project that receives an increase to its size factor pursuant to this paragraph is not placed in service within six months of the 9% component, both applicants may be subject to negative points.

If the project's paid purchase price exceeds appraised value, the leveraged soft resources amount shall be discounted by the overage, unless the Executive Director has granted a waiver pursuant to Section 10327(c)(6).

(B) One (1) minus the ratio of requested unadjusted eligible basis to total residential project development costs, with the resulting figure divided by two.

(C) Except as provided below, a new construction Large Family housing type project (excluding a Special Needs project with non-special needs Low-Income Units meeting Large Family housing type requirements) shall receive a higher resource area bonus as follows based on the designation of the project's location on the CTCAC/HCD Opportunity Area Map:

The project is non-rural and the project's census tract is a Highest Resource area
20 percentage points

The project is non-rural and the project's census tract is a High Resource area
10 percentage points

The project is rural and project's census tract or census block group as applicable is a Highest Resource area 10 percentage points

The project is rural and the project's census tract or census block group as applicable is a High Resource area 5 percentage points

This bonus shall not apply to projects once the housing type goal for Large Family New Construction receiving the tiebreaker increase has been met in a round or within the Rural set aside in a round as described in Section 10315(h) and Section 10325(c)(9).

This bonus shall not apply to projects competing in the Native American apportionment, unless such projects fall into the rural set-aside competition. In addition, this bonus shall not apply to a project supported by affordable housing ordinances, which for purposes of this subparagraph shall mean a project in which any of the Low-Income Units satisfy the obligations of any affordable housing ordinance, development agreement or legally enforceable mandate negotiated between a public entity and private developer, unless the obligations derive solely from the Low-Income Units themselves or unless the project includes at least 40 Low-Income Units that are not counted towards the obligations of the affordable housing ordinance, development agreement, or legally enforceable mandate. An application for a large family new construction project located in a High or Highest Resource area shall disclose whether or not the project includes any Low-Income Units which satisfy the obligations of an affordable housing ordinance, development agreement or legally enforceable mandate and, if so, the number of such units and whether the affordable obligations derive solely from the Low-Income Units themselves.

An applicant may choose to utilize the census tract, or census block group as applicable, resource designation from the CTCAC/HCD Opportunity Maps in effect when the initial site control was obtained up to seven calendar years prior to the application.

(D) For Rural set aside projects applying in counties where no tax credit applications have been received within five years of the application filing date, the tiebreaker shall be increased by five percentage points.

The resulting tiebreaker score must not have decreased following award or negative points may be awarded.

(d) Application selection for evaluation. Except where CTCAC staff determines a project to be high cost, staff shall score and rank projects as described below. Staff shall identify high-cost projects by comparing each scored project's total eligible basis against its total adjusted threshold basis limits. CTCAC shall calculate total eligible basis by using all project costs listed within the application unless those costs are not includable in basis under federal law as demonstrated by the shaded cells in the application sources and uses budget itself or by a letter from the development team's third-party tax professional. A project will be designated "high cost" if a project's total eligible basis exceeds its total adjusted threshold basis limit by 30%. Staff shall not recommend such project for credits. Any project that receives a reservation on or after January 1, 2016 may be subject to negative points if the project's total eligible basis at placed in service exceeds the revised total adjusted threshold basis limit by 40%. For purposes of calculating the high-cost test at placed in service, CTCAC shall use the higher of the unadjusted threshold basis limit from application or the year the project places in services.

Following the scoring and ranking of project applications in accordance with the above criteria, subject to conditions described in these regulations, reservations of Tax Credits shall be made for those applications of highest rank in the following manner.

(1) Set-aside application selection. Beginning with the top-ranked application from the Nonprofit set-aside, followed by the Rural set-aside (funding the RHS, HOME, and CDBG-DR program apportionment first, and the Native American apportionment second), the At-Risk set-aside, and the Special Needs set-aside, the highest scoring applications will have Tax Credits reserved. Credit amounts to be reserved in the set-asides will be established at the exact percentages set forth in section 10315, with the exception of the Federal Credit amount established by the Further Consolidated Appropriations Act, 2020 and the Consolidated Appropriations Act, 2021. If the last project funded in a set-aside requires more than the credits remaining in that set-aside, such overages in the first funding round will be subtracted from that set-aside in determining the amount available in the set-aside for the second funding round. If Credits are not reserved in the first round, they will be added to second round amounts in the same Set Aside. If more Tax Credits are reserved to the last project in a set-aside than are available in that set-aside during the second funding round, the overage will be taken from the Supplemental Set-Aside if there are

sufficient funds. If not, the award will be counted against the amounts available from the geographic area in which the project is located. Any unused credits from any Set-Asides will be transferred to the Supplemental Set-Aside and used for Waiting List projects after the second round. Tax Credits reserved in all set-asides shall be counted within the housing type goals.

(A) For an application to receive a reservation within a set-aside, or within a rural set-aside apportionment, there shall be at least one dollar of Credit not yet reserved in the set-aside or apportionment.

(B) Set-aside applications requesting State tax credits shall be funded, even when State credits for that year have been exhausted. The necessary State credits shall be reserved from the subsequent year's aggregate annual State credit allotment.

(C) Except for projects competing in the rural set-aside, which shall not be eligible to compete in geographic area, unless the projects are located within a Geographic Region and no other projects have been funded within the Project's region during the year in question, after a set-aside is reserved, all remaining applications competing within the set-aside shall compete in the Geographic Region.

Federal Credit established by the FCAA application selection. Applications for projects located in the counties designated as qualified 2017 and 2018 California disaster areas by the FCAA, FCAA Federal Credit shall only be reserved for (1) new construction projects also including projects that involve the demolition or rehabilitation of existing residential units that increase the unit count by (i) 25 or (ii) 50% of the existing units, whichever is greater, and adaptive re-use of non-residential structures, or (2) reconstruction or rehabilitation of an existing project located within a FCAA disaster area fire perimeter, as designated by CAL FIRE and available on the CTCAC website https://www.treasurer.ca.gov/ctcac/, and directly damaged by the fire, and that apply for the FCAA Federal Credit. Applications shall meet all program eligibility requirements unless stated otherwise below, and located in the following counties: Butte, Lake, Los Angeles, Mendocino, Napa, Nevada, Orange, San Diego, Santa Barbara, Shasta, Sonoma, Ventura, and Yuba.

Applications for projects applying for FCAA Federal Credit shall be competitively scored within the county apportionment under the system delineated in Sections 10325(c)(1) through (3), (4)(B), and (6). In the cases where applications receive the same score, the following tiebreakers shall be employed: First, a formal letter of support for the specific project from the Local Reviewing Agency (LRA) outlining how the project will contribute to the community's recovery efforts submitted in the application or received by CTCAC no later than 14 days following the application filing deadline; Second, the application with the greatest number of proposed Tax Credit Units per annual Federal Tax Credit amount requested; and Third, the application with the greatest number of proposed bedrooms within the proposed Tax Credit Units.

For projects located within a FCAA disaster area fire perimeter, as designated by CAL FIRE and available on the CTCAC website https://www.treasurer.ca.gov/ctcac/, applying for FCAA Federal Credit in the 2020 funding round, local approvals and zoning requirements of Section 10325(f)(4) must be evidenced to CTCAC no later than June 1, 2021. Failure to do so shall result in rescission of the Tax Credit Reservation on June 2, 2021. The deadline in this paragraph may be extended if the Executive Director finds, in their~~his or her~~ sole discretion, a project merits additional time due to delays directly caused by fire, war, or act of God. In considering a request, the Executive Director may consider, among other things, the length of the delay and the circumstances relating to the delay.

The deferred-payment financing commitment requirements of Section 10325(f)(8) are modified for FCAA Federal Credit applications with 2017 and 2018 HCD Community Development Block Grant – Disaster Recovery (CDBG-DR) Multifamily financing as follows:

a letter from an HCD identified jurisdiction stating the intent to commit a portion of that jurisdiction's HCD allocation. The letter must provide the dollar amount and the estimated date which the jurisdiction will provide CTCAC a written commitment in compliance with the requirements of Section 10325(f)(8). Projects must receive these CDBG-DR funds prior to the CTCAC placed-in service application deadline.

FCAA Federal Credit shall be made available starting in the 2020 second funding round in the amounts shown below:

ANNUAL FEDERAL TAX CREDIT BASE + LOST UNIT ALLOCATION	COUNTY
$40,087,453	Butte
$16,365,940	Sonoma
$5,630,499	Los Angeles
$5,421,263	Shasta
$4,975,965	Ventura
$4,109,511	Napa
$3,342,311	Mendocino
$3,259,153	Lake
$2,886,283	Yuba
$2,816,537	San Diego
$2,583,158	Santa Barbara
$2,580,476	Nevada
$2,561,698	Orange
$2,000,000	Supplemental
$98,620,247	**TOTAL**

The funding order shall be followed by funding the highest scoring application, if any, in each of the 13 counties. After each county has had the opportunity to fund one project, CTCAC shall award the second highest scoring project in each county, if any, and continue cycling through the counties, filling each county's apportionment.

For an application to receive a FCAA Federal Credit reservation, there shall be at least one dollar of Credit not yet reserved in the county allocation so long as the county's last award does not cause the county's aggregate award amount to exceed 105 percent (105%) of the amount originally available for that county. FCAA Federal Credit allocated in excess of the county's allocation by the application of the 105% rule described above will be deducted from the Supplemental allocation. If the last application requires credits in excess of 105% of the county's allocation, that application will not be funded. If all FCAA Federal Credit in a funding round has been awarded, all remaining FCAA applications shall compete in the applicable set-aside or geographic region, provided the application meets the requirements of the set-aside or geographic region, and the requirements of Section 10325.

At the conclusion of the funding round, if less than 10% of the total FCAA Federal Credit remains, all unallocated FCAA Federal Credit within the county allocations will be combined and available to remaining projects requesting FCAA Federal Credits, and which meet the threshold and underwriting requirements through a waiting list. The award selection will be made from the waiting list to the counties in the order listed above. Within each county, the award selection will start with the highest-ranking project located within a FCAA disaster area fire perimeter, as designated by CAL FIRE and available on the CTCAC website https://www.treasurer.ca.gov/ctcac/ first and continue within that county in rank order until no eligible applications remain. Subsequent to the above selection ranking, any unused FCAA Federal Credit shall be designated for projects where at least fifty percent (50%) of the Low-Income Units within the project are designated for homeless households as described in Sections 10315(b)(1) through (4) starting with the highest-ranking project pursuant to Section 10325(c) without regard to the set aside or geographic region for which the application applied.

All projects awarded FCAA Federal Credit in 2020 may return their allocation to the Committee without assessment of negative points if the formal written notification from the applicant of the return is received by the Committee no later than September 1, 2021. Any returned credits following September 1, 2021 will be made available to projects from the FCAA Federal Credit waiting list as previously stated. Any new application received for a project on the waiting list shall result in that project's removal from the waiting list.

The FCAA Federal Credit amount shall not be counted towards the set asides of Section 10315, the housing type goals of Section 10315(h), or the geographic apportionments of Section 10315(i). Applications for FCAA Federal Credit shall not be counted towards the four (4) awards limit of Section 10325(c). Notwithstanding Section 10325(f)(9)(C), the maximum annual Federal Tax Credits available for award to any one project in any funding round applying for FCAA Federal Credit shall not exceed Five Million Dollars ($5,000,000). Applications for FCAA Federal Credit are not eligible for State Tax Credits.

Federal Credit established by the CAA application selection. Applications for projects located in the counties designated as qualified 2020 California disaster areas by the CAA, CAA Federal Credit shall only be reserved for (1) new construction projects also including projects that involve the demolition or rehabilitation of existing residential units that increase the unit count by (i) 25 or (ii) 50% of the existing units, whichever is greater, and adaptive re-use of nonresidential structures, or (2) reconstruction or rehabilitation of an existing project located within a CAA or FCAA disaster area fire perimeter, as designated by CAL FIRE and available on the CTCAC website https://www.treasurer.ca.gov/ctcac/, and directly damaged by the fire, and that apply for the CAA Federal Credit. Applications shall meet all program eligibility requirements unless stated otherwise below, and located in the following counties: Butte, Fresno, Lake, Lassen, Los Angeles, Madera, Mendocino, Monterey, Napa, San Bernardino, San Diego, San Mateo, Santa Clara, Santa Cruz, Shasta, Siskiyou, Solano, Sonoma, Stanislaus, Trinity, Tulare, and Yolo.

Applications for projects applying for CAA Federal Credit shall be competitively scored within the county/regional apportionment under the system delineated in Sections 10325(c)(1) through (8). At the sole discretion of the Executive Director, an extension of up to 90 days may be granted to the 180/194-day readiness deadline. In the cases where applications receive the same score, the following tiebreakers shall be employed: First, projects located within a CAA or FCAA disaster area fire perimeter, as designated by CAL FIRE and available on the CTCAC website https://www.treasurer.ca.gov/ctcac/, and not opposed or strongly opposed by the Local Reviewing Agency (LRA); Second, the presence of an enforceable financing commitment to the specific project of at least $1,000,000 from ~~the State of California Department of Housing and Community Development ("~~HCD~~")~~ and assuming a 4% tax credit financing structure such that the Federal Tax Credit request divided by the total eligible basis does not exceed 7.5%; and Third, the application with the greatest number of proposed bedroom-adjusted Tax Credit Units per annual Federal Tax Credit amount requested. To calculate the bedroom-adjusted units, each Tax Credit Unit will be multiplied by the adjustment factor for units of that bedroom count. A project's adjusted units shall be the sum of each of these products. The adjustment factors shall be:

- .9 for a studio unit.
- 1 for a one-bedroom unit.
- 1.25 for a two-bedroom unit.
- 1.5 for a three-bedroom unit up to no more than 30% of the total units, then such additional units shall be counted as 2-bedroom units.
- 1.75 for a four-bedroom or larger unit up to no more than 10% of the total units, then such additional units shall be counted as 2-bedroom units.

The deferred-payment financing commitment requirements of Section 10325(f)(8) are modified for CAA Federal Credit applications with HCD Community Development Block Grant – Disaster Recovery (CDBG-DR) Multifamily financing as follows: a letter from an HCD identified jurisdiction stating the intent to commit a portion of that jurisdiction's HCD allocation. The letter must provide the dollar amount and the estimated date which the jurisdiction will provide CTCAC a written commitment in compliance with the requirements of Section 10325(f)(8). Projects must receive these CDBG-DR funds prior to the CTCAC placed-in service application deadline. CAA Federal Credit shall be made available starting in the 2021 second funding round in the amounts shown below:

ANNUAL FEDERAL TAX CREDIT BASE + LOST UNIT ALLOCATION	COUNTY/ REGION
$17,261,698	Butte County
$12,058,293	Santa Cruz County
$9,395,477	Napa County
$8,714,494	North Region (San Mateo, Santa Clara, Shasta, Solano, Stanislaus, and Yolo Counties)
$8,609,728	Fresno County
$8,408,925	Sonoma County
$7,553,332	South Region (Madera, Monterey, Los Angeles, San Bernardino, San Diego, and Tulare Counties)
$6,741,391	Rural (Lake, Lassen, Mendocino, Siskiyou, and Trinity Counties)
$2,000,000	Supplemental
$80,743,338	**TOTAL**

The funding order shall start with applications selected in rank order within each county/region in the order above. For an application to receive a CAA Federal Credit reservation, there shall be at least one dollar of Credit not yet reserved in the county/region allocation so long as the county/region's last award does not cause the county/region aggregate award amount to exceed 105 percent (105%) of the amount originally available for that county/region. CAA Federal Credit allocated in excess of the county/region's allocation by the application of the 105% rule described above will be deducted from the Supplemental allocation. If the last application selected requires credits in excess of 105% of the county/region's allocation, that application will not be funded. Any CAA Federal Credit remaining in a county/region apportionment at the end of a funding round will be available in the subsequent round. For the final funding round of 2022 for CAA Federal Credits, if the aggregate amount of Federal Credit requested does not exceed the amount available, the 105% county limit above shall not apply. If all CAA Federal Credit in a funding round has been awarded, all remaining CAA applications shall compete in the applicable set-aside or geographic region, provided the application meets the requirements of the set-aside or geographic region, and the requirements of Section 10325.

At the conclusion of the funding round, if less than 10% of the total CAA Federal Credit remains, all unallocated CAA Federal Credit within the county/region allocations will be combined and available to remaining projects requesting CAA Federal Credits, and which meet the threshold and underwriting requirements through a waiting list. The award selection will be made from the waiting list to the counties in order number of lost homes highest to lowest. Within each county, the award selection will start with the highest-ranking project located within a CAA or FCAA disaster area fire perimeter, as designated by CAL FIRE and available on the CTCAC website https://www.treasurer.ca.gov/ctcac/ first and continue within that county in rank order until no eligible applications remain.

The CAA Federal Credit amount shall not be counted towards the set asides of Section 10315, the housing type goals of Section 10315(h), or the geographic apportionments of Section 10315(i). Applications for CAA Federal Credit shall not be counted towards the four (4) awards limit of Section 10325(c). Notwithstanding Section 10325(f)(9)(C), the maximum annual Federal Tax Credits available for award to any one project in any funding round applying for CAA Federal Credit shall not exceed Four Million Dollars ($4,000,000). Applications for CAA Federal Credit are not eligible for State Tax Credits.

(2) Geographic Areas selection. Tax Credits remaining following reservations to all set-asides shall be reserved to projects within the geographic areas, beginning with the geographic area having the smallest apportionment, and proceeding upward according to size in the first funding round and in reverse order in the second funding round. The funding order shall be followed by funding the highest scoring application, if any, in each of the regions. After each region has had the opportunity to fund one project, CTCAC shall award the second highest scoring project in each region, if any, and continue cycling through the regions, filling each geographic area's apportionment. Projects will be funded in order of their rank so long as the region's aggregate award amount does not exceed 125 percent (125%) of the amount originally available for that region in that funding round. Credits allocated in excess of the Geographic Apportionments by the application of the 125% rule described above will be drawn from the second-round apportionments during the first round, and from the Supplemental Set Aside during the second round. However, all Credits drawn from the Supplemental Set Aside will be deducted from the Apportionment in the subsequent round.

When the highest-ranking project or next highest-ranking project(s) do not meet the 125% rule then the Committee shall skip over that project to fund a project requesting a smaller credit award that does not exceed the 125% requirement. However, no project may be funded by this skipping process unless it (a) has a point score equal to that of the first project skipped, and (b) has a final tiebreaker score equal to at least 75% of the first skipped project's final tiebreaker score.

To the extent that there is a positive balance remaining in a geographic area after a funding round, such amount will be added to the amount available in that geographic area in the subsequent funding round. Similarly, to the extent that there is a deficit in a geographic area after a funding round, such amount will be subtracted from the funds available for reservation in the next funding round. Any unused credit from the geographic areas in the second funding round will be added back into the Supplemental Set-Aside. Tax credits reserved in all geographic areas shall be counted within the housing type goals.

(e) Application Evaluation. To receive a reservation of Tax Credits, applications selected pursuant to subsection (d) of this Section, shall be evaluated, pursuant to IRC Section 42, H & S Code Sections 50199.4 through 50199.22, R & T Code Sections 12206, 17058, and 23610.5, and these regulations to determine if; eligible, by meeting all program eligibility requirements; complete, which includes meeting all basic threshold and additional threshold requirements; and financially feasible. In scoring and evaluating project applications, the Executive Director shall have the discretion to interpret the intent of these regulations and to score and evaluate applications accordingly. Applicants understand that there is no “right” to receive Tax Credits under these regulations. The Committee shall make available to the general public a written explanation for any allocation of Tax Credits that is not made in accordance with the established priorities and selection criteria of these Regulations.

(f) Basic Thresholds. No~~An~~ application is ~~shall be determined to be~~ complete without~~by demonstration of~~ meeting the following basic threshold requirements~~, among other tests. All basic thresholds shall be met at the time the application is filed through a presentation of conclusive, documented evidence~~ at the time the application is filed and to the Executive Director’s satisfaction:~~.~~

(1) Housing need and demand. Applicants shall provide evidence that the type of housing proposed, including proposed rent levels, is needed and affordable to the targeted population within the community in which it is located, with evidence including a market study that meets the current market study guidelines distributed by the Committee. Market studies will be assessed thoroughly. Meeting the requirements of subsection (B) below is essential, but because other elements of the market study will also be considered, meeting those requirements in subsection (B) will not in itself show adequate need and demand for a proposed project or ensure approval of a given project. Evidence shall be conclusive and include the most recent documentation available (prepared or updated within ~~one year~~180 days of the application date~~ and updated, if necessary~~). Evidence of housing need and demand shall include, but is not limited to:

(A) evidence of public housing waiting lists, by bedroom size and tenant type, if available, from the local housing authority; and

(B) except as provided in Section 10322(h)(10), a market study as described in Section 10322(h)(10) of these regulations, which provides evidence that:

(i) The proposed tenant paid rents for each affordable unit type in the proposed development will be at least ten percent (10%) below the weighted average rent for the same unit types in comparable market rate rental properties;

(ii) Except for special needs rehabilitation projects in which at least 90% of the total units are SRO units, the proposed unit value ratio stated as dollars per square foot ($/s.f.) will be no more than the weighted average unit value ratios for comparable market rate units;

(iii) In rural areas without sufficient three- and four-bedroom market rate rental comparables, the market study must show that in comparison to three- and four-bedroom market rate single family homes, the affordable rents will be at least 20% below the rents for single family homes and the $/s.f. ratio will not exceed that of the single family homes; and

(iv) The demand for the proposed project’s units must appear strong enough to reach stabilized occupancy – 90% occupancy for Special Needs projects and 95% for all other projects – within six months of being placed in service for projects of 150 units or less, and within 12 months for projects of more than 150 units and senior projects.

(2) Demonstrated site control. Applicants shall provide evidence that the subject property is within the control of the applicant.

(A) Site control may be evidenced by:

(i) a current title report (within 90 days of application except as provided in Section 10322(h)(35) (or preliminary title report, but not title insurance or commitment to insure) showing the applicant holds fee title or, for tribal trust land, a title status report or an attorney's opinion regarding chain of title and current title status;

(ii) an executed lease agreement or lease option for the length of time the project will be regulated under this program connecting the applicant and the owner of the subject property;

(iii) an executed disposition and development agreement connecting the applicant and a public agency; or,

(iv) a valid, current, enforceable contingent purchase and sale agreement or option agreement connecting the applicant and the owner of the subject property. Evidence must be provided at the time of the application that all extensions and other conditions necessary to keep the agreement current through the application filing deadline have been executed.

(B) A current title report (within 90 days of application except as provided in Section 10322(h)(35) (or preliminary title report, but not title insurance or commitment to insure) or for tribal trust land a title status report or an attorney's opinion regarding chain of title and current title status, shall be submitted with all applications for purposes of this threshold requirement.

(C) The Executive Director may determine, in her/his sole discretion, that site control has been demonstrated where a local agency has demonstrated its intention to acquire the site, or portion of the site, through eminent domain proceedings.

(3) Enforceable financing commitment. Applicants shall provide evidence of enforceable financing commitments for at least fifty percent (50%) of the acquisition and construction financing, or at least fifty percent (50%) of the permanent financing, of the proposed project's estimated total acquisition and construction or total permanent financing requirements. An "enforceable financing commitment" must:

(A) be in writing, stating rate and terms, and in the form of a loan, grant or an approval of the assignment/assumption of existing debt by the mortgagee;

(B) be subject only to conditions within the control of the applicant, but for obtaining other financing sources including an award of Tax Credits;

(C) have a term of at least fifteen (15) years if it is permanent financing;

(D) demonstrate feasibility for fifteen (15) years at the underwriting interest rate, if it is a variable or adjustable interest rate permanent loan; and,

(E) be executed by a lender other than a mortgage broker, the applicant, or an entity with an identity of interest with the applicant, unless the applicant is a lending institution actively and regularly engaged in residential lending; and

(F) be accepted in writing by the proposed mortgagor or grantee, if private financing.

Substitution of such funds after a Reservation of Tax Credits may be permitted only when the source of funding is similar to that of the original funding, for example, use of a bank loan to substitute for another bank loan, or public funds for other public funds. General Partner loans or developer loans must be accompanied by documented proof of funds being available at the time of application. In addition, General Partner or developer loans to the project are unique and may not be substituted for or foregone if committed to within the application. After a Reservation of Tax Credits an applicant may substitute Affordable Housing Program (AHP) funds provided pursuant to a program of the Federal Home Loan Bank for any other source.

Projects awarded under a Nonprofit set-aside homeless assistance priority or a Rural set-aside RHS, HOME, or CDBG-DR apportionment pursuant to a funding commitment may not substitute other funds for this commitment after application to CTCAC. Failure to retain the funding may result in an award of negative points.

For projects using FHA-insured debt, the submission of a letter from a Multifamily Accelerated Processing (MAP) lender stating that they have underwritten the project and that it meets the requirements for submittal of a multifamily accelerated processing firm commitment application to HUD.

(4) Local approvals and Zoning.

(A) Applicants shall provide evidence, at the time the application is filed, that the project as proposed is zoned for the intended use and has obtained all applicable local land use approvals which allow the discretion of local elected officials to be applied, except that an appeal period may run 30 days beyond that application due date. ~~Examples of such approvals include, but are not limited to, general plan amendments, rezonings, and conditional use permits~~. When the appeal period, if any, is concluded, the applicant must provide proof that either no appeals were filed, or that any appeals filed during that time were resolved within that 30-day period and the project is ready to proceed.

~~(4)~~(B) For purposes of this subdivision, "local land use approvals" includes, but is not limited to, general plan amendments, rezonings, and conditional use permits and ~~Notwithstanding the first sentence of this subsection, local land use approvals~~ does not ~~required to be obtained at the time of application~~ include~~,~~ design review, initial environmental study assessments, variances, and development agreements~~. The evidence must describe the local approval process, the applicable approvals, and whether each required approval is "by right," ministerial, or discretionary. When the appeal period, if any, is concluded, the applicant must provide proof that either no appeals were filed, or that any appeals filed during that time period were resolved within that 30-day period and the project is ready to proceed~~.

(C) Documentation required to meet the evidentiary burden under subdivision (A) must describe the local approval process, the applicable approvals, and whether each required approval is "by right," ministerial, or discretionary. In lieu of a local land use approval, projects that qualify for "by right" or ministerial approval may submit confirmation of a development's eligibility for such approval from HCD's Housing Accountability Unit or a third-party attorney letter that explains how the project complies with the applicable requirements.

(D) The Committee may require, as evidence to meet this requirement, submission of a Committee-provided form letter to be signed by an appropriate local government planning official of the applicable local jurisdiction, including acknowledgment of any zoning or land use approvals pursuant to a state streamlined approval requirement.

(E) Rehabilitation projects not requiring land use approvals are exempt from the requirements above.

(5) Financial feasibility. Applicants shall provide the financing plan for the proposed project and shall demonstrate the proposed project is financially feasible and viable as a qualified low income housing project throughout the extended use period. A fifteen-year pro forma of all revenue and expense projections, starting as of the planned placed in service date for new construction projects, and as of the rehabilitation completion date for

acquisition/rehabilitation projects, is required. The financial feasibility analysis shall use all underwriting criteria specified in Section 10327 of these regulations.

(6) Sponsor characteristics. Applicants shall provide evidence that proposed project participants, as a Development Team, possess all of the knowledge, skills, experience and financial capacity to successfully develop, own and operate the proposed project. The Committee may conduct an investigation into an applicant's background that it deems necessary, in its sole discretion, and may determine if any of the evidence provided shall disqualify the applicant from participating in the Credit programs, or if additional Development Team members need be added to appropriately perform all program requirements.

(7) Minimum construction standards. For preliminary reservation applications, applicants shall provide a statement that the following minimum specifications will be incorporated into the project design for all new construction and rehabilitation projects. In addition, a statement shall commit the property owner to at least maintaining the applicable Building Energy Efficiency Standards (Energy Code, California Code of Regulations, Title 24) adopted by the California Energy Commission (CEC) as well as maintaining the installed energy efficiency and sustainability features' quality when replacing each of the following listed systems or materials:

(A) Energy Efficiency. All rehabilitated buildings, both competitive and non-competitive, shall meet one of the following:~~have improved energy efficiency above the modeled energy consumption of the building(s) based on existing conditions documented using the Sustainable Building Method Workbook's CTCAC Existing Multifamily Assessment Protocols and reported using the CTCAC Existing Multifamily Assessment Report template. Rehabilitated buildings shall document at~~

(i) Achieve least a 10% post-rehabilitation improvement over existing conditions energy efficiency achieved for the project as a whole, except that Scattered Site applications shall also document at least a 5% post-rehabilitation improvement over existing conditions energy efficiency achieved for each site. In the case of projects in which energy efficiency improvements have been completed within five years prior to the application date or since the last tax credit award pursuant to a public or regulated utility program or other governmental program that established existing conditions of the systems being replaced using a HERS Rater, the applicant may include the existing conditions of those systems prior to the improvements. ~~Furthermore, rehabilitation applicants must submit a completed Sustainable Building Method Workbook with their placed-in-service application unless they are developing a project in accordance with the minimum requirements of Leadership in Energy & Environmental Design (LEED), Passive House Institute US (PHIUS), Passive House, Living Building Challenge, National Green Building Standard ICC / ASRAE – 700 silver or higher rating or GreenPoint Rated Program.~~

~~(A)~~(ii) At least 2 out of 3 residential end uses (cooking, space heating, and water heating) are electrified, or the building(s) is electric ready as defined in Section 160.9 of the 2022 Building Energy Efficiency Standards.

(B) Landscaping. If landscaping is to be provided or replaced, a variety of plant and tree species that require low water use shall be provided in sufficient quantities based on landscaping practices in the general market area and low maintenance needs. Projects shall follow the requirements of the state Model Water Efficient Landscape Ordinance (http://www.water.ca.gov/wateruseefficiency/landscapeordinance/) unless a local landscape ordinance has been determined to be at least as stringent as the current model ordinance.

(C) Roofs. Newly installed roofing shall carry a three-year subcontractor guarantee and at least a 20-year manufacturer's warranty.

(D) Exterior doors. If exterior doors are to be provided or replaced, insulated or solid core, flush, paint or stain grade exterior doors shall be made of metal clad, hardwood faces, or fiberglass faces, with a standard one-year guarantee and all six sides primed.

(E) Appliances. All Low-Income Units shall provide a refrigerator. All non-SRO Low-Income Units shall provide a range (~~cook~~stovetop and oven), and all SRO Low-Income Units shall include a cooking facility (i.e. ~~at least~~ a cooktop or microwave). The Executive Director may waive the ~~refrigerator and cooking facility~~appliance requirement for SRO units if the project includes a tenant common area kitchen facility~~ for tenants~~. As applicable, appliances ~~Refrigerators, dishwashers, clothes washers and dryers~~ provided or replaced within Low-Income Units and/or in on-site community facilities shall be ENERGY STAR rated~~ appliances~~, unless waived by the Executive Director.

(F) Window coverings. Window coverings shall be provided and may include fire retardant drapes or blind.

(G) Water heater. If water heaters are to be provided or replaced, for Low-Income Units with individual tank-type water heaters, minimum capacities are to be 28 gallons for one- and two-bedroom units and 38 gallons for three-bedroom units or larger.

(H) Floor coverings. If floor coverings are to be provided or replaced, a hard, water resistant, cleanable surface shall be required for all kitchen and bath areas. Any carpet provided or replaced shall comply with HUD/FHA~~U.S. Department of Housing and Urban Development/Federal Housing Administration~~ UM44D.

(I) All fiberglass-based insulation provided or replaced shall meet the Greenguard Gold Certification (http://greenguard.org/en/CertificationPrograms/CertificationPrograms_childrenSchools.aspx).

(J) On-Site Manager's Unit.

~~(J)~~ (i) An on-site manager's unit is required for~~Consistent with California State law,~~ projects with 16 or more Low-Income and Market-Rate Units~~ must have an on-site manager's unit~~. Projects with at least 161 Low-Income and Market-Rate Units shall provide a second on-site manager's unit for either another on-site manager or other maintenance personnel, and there shall be one additional on-site manager's unit for either another on-site manager or other maintenance personnel for each 80 Low-Income and Market-Rate Units beyond 161 units, up to a maximum of four on-site manager's units.

(ii) Scattered site projects totaling 16 or more Low-Income and Market-Rate Units must have at least one on-site manager's unit for the entire project, and at least one manager's unit at each site where that site's building(s) consist of 16 or more Low-Income and Market-Rate Units. Scattered sites within 100 yards of each other shall be treated as a single site for purposes of this paragraph~~e on-site manager rule only~~.

(iii) If an applicant or project owner proposes using~~to utilize~~ a ~~l~~Low-~~i~~Income ~~u~~Unit to meet the requirements of subdivision (f)(7)(J), the owner must comply with the ~~California and CTCAC~~Resident Manager's Unit requirements set forth in

CTCAC's Compliance Manual, available on CTCAC's website (https://www.treasurer.ca.gov/ctcac/compliance/manual.asp) and incorporated herein by reference ~~manager unit requirements, the following applies: (1) the unit is considered a low-income restricted unit and must comply with all requirements associated with low-income restricted units; (2) the unit is included in the applicable fraction; and (3) the tenant cannot be evicted upon employment termination. If employment is terminated, the project owner is responsible for continuing to meet California and CTCAC onsite manager unit requirements. Any application proposing to utilize a low-income unit to meet California and CTCAC manager unit requirements must include a description in the application of how the project will meet those requirements if employment is terminated~~.

(iv) At the Executive Director's discretion and upon approval by the Executive Director, in lieu of providing an on-site manager, a project may meet the on-site manager unit requirements of subdivision (f)(7)(J)(i)-(ii) by providing tenants with equivalent access to management services. For example~~In lieu of on-site manager units~~, a project may commit to employ an equivalent number of on-site full-time property management staff (at least one of whom is a property manager) and provide an equivalent number of desk or security staff who are not tenants and are capable of responding to emergencies for the hours when property management staff is not working. All staff or contractors performing desk or security work shall be knowledgeable of how the property's fire system operates and be trained in, and have participated in, fire evacuation drills for tenants. CTCAC reserves the right to require that one or more on-site managers' units be provided and occupied by property management staff if, in its sole discretion, it determines as part of any on-site inspection that the project has not been adequately operated and/or maintained. Nothing herein relieves the applicant from complying with any other local, state, or federal laws regarding on-site manager units.

(K) Accessible Housing Unit(s). All ~~new construction~~ projects shall comply with the Housing and Building Accessibility Requirements in addition to the following, unless otherwise specified:~~shall adhere to the provisions of California Building Code (CBC) Chapter 11(B) regarding accessibility to privately owned housing made available for public use in all respects except as follows: instead of the minimum requirements established in 11B 233.3.1.1 and 11B 233.3.1.3, all~~

~~(K)~~ (i) All new construction projects must provide a minimum of fifteen percent (15%) of the Low-Income Units as Housing Units with ~~m~~Mobility ~~f~~Features~~, as defined in CBC 11B 809.2 through 11B 809.4~~, and a minimum of ten percent (10%) of the Low-Income Units ~~with~~as Housing Units with Hearing/Vision ~~communications f~~Features~~, as defined in CBC 11B 809.5. These units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project consistent with 24 CFR Section 8.26~~.

(ii) Rehabilitation projects shall provide a minimum of ten percent (10%) of the Low-Income Units as Housing Units with ~~m~~Mobility ~~f~~Features~~, as defined in CBC 11B 809.2 through 11B 809.4~~, and four percent (4%) as Housing Units with ~~communications~~Hearing/Vision ~~f~~Features~~, as defined in CBC 11B 809.5. To the maximum extent feasible and subject to reasonable health and safety requirements, these units shall be distributed throughout the project consistent with 24 CFR Section 8.26~~. At least one of each common area facility type and amenity, ~~as well as~~ paths of travel between accessible units and such facilities and amenities, the building entry and public right of way, and the leasing office or area shall also be made accessible utilizing the Housing and Accessibility

Requirements and CBC Chapter 11~~(~~B~~)~~ as a design standard. In all other respects, applicable building code will apply. Projects with other~~particular~~ federal, state, or local funding sources may be required to meet additional accessibility requirements~~ related to these other sources~~. The Executive Director may approve a partial or full waiver to the requirements for the number of Accessible Housing Units exceeding those required by the ADA, Section 504, and CBC Ch. 11B provided both of the following are met:

(a) The exemption does not pertain to any accessibility features required by applicable building codes, the CBC Chapter 11B, or federal law. The CBC Ch. 11B and federal law minimums are calculated on all units in the project, not just restricted units, and

(b) The Applicant and its architect demonstrate that full compliance with subsection (f)(7)(K)(ii) would be impractical or create an undue financial and administrative burden. Accessibility must be provided to the maximum extent feasible and the waiver must be obtained in advance.

(iii) Accessible Housing Units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project and be available in a sufficient range of sizes and amenities so that an individual with disabilities' choice of living arrangements is comparable to that of other persons eligible for housing assistance under the same project consistent with 24 CFR Section 8.26.

(L) Waiver.~~Except for paragraph (J) and (K), i~~If a rehabilitation applicant does not propose to meet any of the requirements of subdivisions (f)(7)(A) through (I)~~this subsection~~, its CNA~~apital Needs Assessment~~ must show why the requirements not being ~~that the standards not proposed to be~~ met are either unnecessary or excessively expensive.~~ The Executive Director may approve a waiver to paragraph (J) for a new construction or rehabilitation project, provided that tenants will have equivalent access to management services. The Executive Director may approve a waiver to paragraph (K) for a rehabilitation project, provided that the applicant and architect demonstrate that full compliance would be impractical or create an undue financial burden and not in conflict with federal or state law.~~ All waivers must be approved in advance by the Executive Director.

(M) Compliance and Verification. The following are required with an Applicant's~~: For~~ placed-in-service application~~s~~:~~,~~

(i) For compliance with subdivision (f)(7)(A), applicants with rehabilitation projects, with the exception of applicants developing a project in accordance with the minimum requirements of LEED, PHIUS, Passive House, Living Building Challenge, National Green Building Standard ICC / ASRAE – 700 silver or higher rating, or GreenPoint Rated Program, must submit a certification of compliance from a California Association of Building Energy Consultants (CABEC) Certified Energy Analyst (CEA) or a ~~completed~~third-party certified HERS Rater~~ Sustainable Building Method Workbook for subsection (A)~~, as applicable.

(ii) For compliance with subdivisions~~For subsections~~ (f)(7)(B) through (I) applicants shall submit LEED, PHIUS, Passive House, Living Building Challenge, National Green Building Standard ICC / ASRAE – 700 silver or higher rating, or GreenPoint Rated Program certification or third-party certification confirming compliance from one of the following: a certified HERS Rater, a certified GreenPoint rater, a US Green Building Council certification, or the project architect.

(iii) For compliance with subdivision~~Subsection~~ (f)(7)(K), the project architect shall provide third party documentation confirming compliance by a CASp or by an architect with demonstrated experience meeting federal accessibility standards.

(iv) Failure to produce appropriate and acceptable third-party documentation in support of information required in (i) through (iii) may result in negative points.

(8) Deferred-payment financing, residual receipts payment financing, grants and subsidies. Notwithstanding any other application requirement, Applicants shall provide evidence that all deferred-payment financing, residual receipts payment financing, grants and subsidies shown in the application are "committed" at the time of application.

(A) Evidence provided shall signify the form of the commitment, the loan, grant or subsidy amount, the length of the commitment, conditions of participation, and express authorization from the governing body, or an official expressly authorized to act on behalf of said governing body, committing the funds, as well as the applicant's acceptance in the case of privately committed loans.

(B) Commitments shall be final and not preliminary, and only subject to conditions within the control of the applicant, with one exception, the attainment of other financing sources including an award of Tax Credits.

(C) Fund commitments shall be from funds within the control of the entity providing the commitment at the time of application.

(D) Substantiating evidence of the value of local fee waivers, exemptions or land write-downs is required.

(E) Substitution or an increase of such funds after a Reservation of Tax Credits may be permitted only when the source of funding is similar to the original funding, for example, private loan to substitute for private loan, public funds for public funds. AHP funds may be substituted for any funding source after a Reservation of Tax Credits if an AHP commitment is obtained after the CTCAC application due date.

(F) A project is exempt from the provisions of this subsection if it has funds anticipated and publicly published with provisional awardee names but not yet officially awarded in the capacity required above with the following entities that administer multifamily financing programs: ~~the Department of Housing and Community Development (~~HCD~~)~~; Strategic Growth Council (SGC); Affordable Housing Program (AHP) provided pursuant to a program of the Federal Home Loan Bank; United States Department of Agriculture (USDA) Rural Housing Service (RHS) Section 514, 515 or 538 programs; the ~~Department of Housing and Urban Development (~~HUD~~)~~; a Reservation of HOME or CDBG-DR funds from the applicable participating jurisdiction.

(9) Project size and credit amount limitations. Project size limitations shall apply to all applications filed, pursuant to this Section.

(A) Rural set-aside applications shall be limited to a maximum of ~~eighty~~one-hundred (~~80~~100) Low-Income Units.

Rehabilitation proposals are excepted from this limitation. The Executive Director may grant a waiver if she or he determines that the rural community is unusual in size or proximity to a nearby urban center, and that exceptional demand exists within the market area.

(B) The total “units” in one or more separate applications, filed by Related Parties, proposing projects within one-fourth (1/4) mile of one another, filed at any time within a twelve (12) month period, shall, for purposes of this subsection be subject to the above project size limitations, except when specifically waived by the Executive Director in unusual circumstances such as HOPE VI or large neighborhood redevelopment proposals pursuant to a specific neighborhood plan. HOPE VI and other large projects will generally be directed towards the tax-exempt bond program

(C) The maximum annual Federal Tax Credits available for award to any one project in any funding round shall not exceed Two Million Five Hundred Thousand ($2,500,000) Dollars.

(10) Projects applying for competitive Tax Credits and involving rehabilitation of existing buildings shall be required to complete, at a minimum, the higher of $40,000 in hard construction costs per unit or 20% of the adjusted basis of the building pursuant to IRC Section 42(e)(3)(A)(ii)(I).

(11) (A) Existing tax credit projects applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication) shall maintain the rents and income targeting levels in the existing regulatory contract for the duration of the new regulatory contract. If the project has exhibited negative cash flow for at least each of the last three years or within the next five years will lose a rental or operating subsidy that was factored into the project’s initial feasibility, the Executive Director may alter this requirement, provided that the new rents and income targeting levels shall be as low as possible to maintain project feasibility. In addition, the Executive Director may approve a reduction in the number of units for purposes of unrestricting a manager’s unit, adding or increasing service or community space, or for adding bathrooms and kitchens to SRO units, provided that the existing rent and income targeting remain proportional.

(B) If the regulatory agreement for an existing tax credit project applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication) contains a requirement to provide service amenities, even if that requirement has expired, the project shall provide a similar or greater level of services for a period of at least 15 years under the new regulatory agreement. A project obtaining maximum CTCAC points for services shall be deemed to have met this requirement. If the project has exhibited cash flow of less than $20,000 for at least each of the last three years, will have no hard debt and fail to break even in year 15 with services, or within the next five years will lose a rental or operating subsidy that was factored into the project’s initial feasibility, the Executive Director may alter this requirement, provided that the service expenditures shall be the maximum that project feasibility allows.

(C) For existing tax credit projects applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication), the pre-rehabilitation reserve study in the CNA shall demonstrate a rehabilitation need of at least $5,000 per unit over the first three years. Projects for which the Executive Director has waived the requirements of Section 10320(b)(4) and projects with ten years or less remaining on the CTCAC regulatory agreement are exempt from this requirement.

(D) Existing tax credit projects applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication) shall not have any uncorrected compliance violations relating to over-income tenants or rent overcharges and shall not have any unpaid fines pursuant to Section 10337(f).

(12) CTCAC shall not accept an application from any party that is disqualified from applying to CDLAC.

(13) A project that includes Low-Income Units targeted at greater than 60% AMI shall have average targeting that does not exceed 50% AMI.

A project with a tax credit reservation dated prior to, or a submitted application pending as of, March 26, 2018 may, with the discretionary approval of the Executive Director, revise its targeting prior to the recordation of the regulatory agreement to include Low-Income Units targeted at greater than 60% AMI only to accommodate existing over-income tenants, provided that the average targeting does not exceed 50% AMI.

A project including Low-Income Units targeted at greater than 60% AMI shall make the “Yes” election on line 8b of the IRS Form 8609.

(g) Additional Threshold Requirements. To qualify for Tax Credits as a Housing Type as described in Section 10315(h), to receive points as a housing type, or to be considered a “complete” application, the application shall meet the following additional threshold requirements. A scattered site more than 1 mile from the nearest other site shall meet the requirements related to common areas, play/recreational facilities, and laundry facilities independently.

(1) Large Family projects. To be considered large family housing, the application shall meet the following additional threshold requirements.

(A) At least twenty-five percent (25%) of the Low-Income Units in the project shall be three-bedroom or larger units, and for projects that receive land use entitlements on or after January 1, 2016 at least an additional twenty-five percent (25%) of the Low-Income Units in the project shall be two-bedroom or larger units, except that for projects qualifying for and applying under the At-risk set-aside, the Executive Director may grant a waiver from this requirement if the applicant shows that it would be cost prohibitive to comply;

(B) One-bedroom Low-Income Units must include at least 450 square feet and two-bedroom Low-Income Units must include at least 700 square feet of living space. Three-bedroom Low-Income Units shall include at least 900 square feet of living space and four-bedroom Low-Income Units shall include at least 1,100 square feet of living space, unless these restrictions conflict with the requirements of another governmental agency to which the project is subject to approval. These limits may be waived for rehabilitation projects, at the discretion of the Executive Director prior to the application submission. Bedrooms shall be large enough to accommodate two persons each and living areas shall be adequately sized to accommodate families based on two persons per bedroom;

(C) Four-bedroom and larger Low-Income Units shall have a minimum of two full bathrooms;

(D) The project shall provide play/recreational facilities suitable and available to all tenants, including children of all ages, except for small developments of 20 units or fewer. Play/recreational area for children ages 2-12 years shall be outdoors, and the minimum square footage is 600 square feet and must include an accessible entrance point. For projects with more than 100 total units this square footage shall be increased by 5 square feet for each additional unit. Outdoor play/recreational space must be equipped with reasonable play equipment for the size of the project, and the surface must be natural or synthetic protective material. The outdoor play area of an onsite day care center may qualify as a play area for children 2-12 years for purposes of this section if it is available to children when the day care center is not open. The application must demonstrate the availability of play or recreational facilities suitable for children ages 13-17. Square footage of a community building cannot be included for the play/recreational area for children ages 13-17 unless that square footage is accessible to minors at all times between 6 a.m. and 10 p.m. except when the area is reserved for service amenities or special events.

Rehabilitation projects with existing outdoor play/recreational facilities may request a waiver of the minimum square footage requirement if outdoor play/recreational facilities of a reasonable size and type currently exist onsite. An existing project without outdoor play/recreational facilities may request a waiver from this requirement if the site is classified as a non-conforming use under its respective current zoning designation and the addition of the new facilities would trigger an entitlement process. The written waiver must be approved prior to the application submission.

~~The Executive Director has the sole discretion to waive t~~This requirement shall be waived if ~~upon demonstration of nearby, readily accessible,~~suitable outdoor play /recreational facilities described above are readily accessible and located within ¼ mile of the project as measured by a walkable path;

(E) For projects exceeding 20 units, ~~T~~the project shall provide an appropriately sized common areas. For purposes of this part, common areas shall include all interior amenity space, such as the rental office, community room, service space, computer labs, and gym, but shall not include laundry rooms or manager living units.

(i) Common areas shall meet the following minimum size requirement:

(a) 600 square feet for projects ~~comprised~~ of 21 to 30 ~~or less~~ total units.~~,~~

(b) ~~at least 600~~1,000 square feet for~~;~~ projects ~~from~~of 31 to 60 total units~~,~~. ~~at least 1000~~

(c) 1,400 square feet for~~;~~ projects ~~from~~of 61 to 100 total units~~,~~. ~~at least 1400~~

(d) 1,800 square feet for~~;~~ projects over 100 total units~~, at least 1800 square feet. Small developments of 20 units or fewer are exempt from this requirement.~~

(ii) ~~At the discretion of t~~The Executive Director~~, these limits~~ may ~~be~~
~~(E)~~ waive~~d~~ the requirements of Subsection 10325(g)(1)(E)(i) for rehabilitation projects with existing common area prior to the application submission. An existing project without common area may request a waiver from this requirement if the site is classified as a non-conforming use under its respective current zoning designation and the addition of the new facilities would trigger an entitlement process;

(F) A public agency shall provide direct or indirect long-term financial support for at least fifteen percent (15%) of the total project development costs, or the owner's equity (includes syndication proceeds) shall constitute at least thirty percent (30%) of the total project development costs;

(G) Adequate laundry facilities shall be available on the project premises, with at least one washing machine~~er~~ and one clothes dryer (washer and dryer) for every 10 units ~~in the project~~. This requirement shall be reduced by 25% for projects where all units have~~ in the project include~~ hook-ups for washers and dryers. If~~ To the extent that~~ tenants are required to pay~~will be charged for the~~ to use ~~of~~ central laundry facilities, washers and dryers must be excluded from eligible basis. If no centralized laundry facilities are provided, washers and dryers shall be provided in each of~~unit in~~ the project's units;

(H) Dishwashers shall be provided in all Low-Income Units except for studio and SRO units. A waiver for one and two bedroom units in rehabilitation projects may be granted at the sole discretion of the Executive Director due to planning or financial impracticality;

(I) Projects are subject to a minimum low-income use period of 55 years (50 years for projects located on tribal trust land).

(2) Senior projects. To be considered senior housing, the application shall meet the following additional threshold requirements;

(A) All units shall be restricted to households eligible under applicable provisions of California Civil Code Section 51.3 and the federal Fair Housing Act, and further be subject to ~~state and federal f~~Fair ~~h~~Housing ~~l~~Laws with respect to senior housing;

(B) ~~For~~ All new construction projects must provide a minimum of 50 percent (50%)~~, one half~~ of all Low-Income Units as Housing Units with Mobility Features~~on an accessible path (ground floor and elevator-serviced) shall be mobility accessible under the provisions of California Building Code (CBC) Chapter 11(B)~~. ~~For~~All rehabilitation projects must provide a minimum of 25 percent~~,~~ (25%) of all Low-Income Units as Housing Units with Mobility Features~~on an accessible path (ground floor and elevator-serviced) shall be mobility accessible under the provisions of CBC Chapter 11(B)~~.

(C) ~~All projects with elevators must comply with CBC Chapter 11(B) accessibility requirements for elevators. All project owners must provide adequate and visible notice to tenants of their ability to request conversion of their adaptable unit to an accessible unit. These units shall, to the maximum extent feasible and subject to reasonable health and safety requirements, be distributed throughout the project consistent with 24 CFR Section 8.26.~~ The Executive Director may approve a partial or full waiver to the requirements for the number of Accessible Housing Units exceeding those requirement by the ADA, Section 504, or CBC Ch. 11B provided:~~in advance for a rehabilitation project, provided that the applicant and architect demonstrate that full compliance would be impractical or create an undue financial burden;~~

(i) the exemption does not pertain to any accessibility features required by the Housing and Building Accessibility Requirements, including the required minimum five percent (5%) Units with mobility features. The CBC Ch. 11B and federal law minimums are calculated on all units in the project, not just restricted units, and

(ii) ~~(B)~~ Consistent with subsection Section 10325(f)(7)(M)(iii), the Applicant and its architect demonstrate that full compliance with subdivision (g)(2)(B) would be impractical or create an undue financial and administrative burden. Accessibility must be provided to the maximum extent feasible and the waiver must be obtained in advance.

~~(C)~~(D) ~~Buildings over two stories shall have an elevator~~Access to all common areas and housing units within each building shall be provided without the required use of stairs, either by means of an elevator or sloped walking ramps, consistent with the senior housing requirements of California Civil Code, sections 51.2-51.4 (Unruh Act) and Government Code, section 12955.9.~~;~~

~~(D)~~(E) No more than twenty percent (20%) of the Low-Income Units in the project shall be larger than one-bedroom units, unless waived by the Executive Director, when supported by a full market study;

~~(E)~~(F) One-bedroom Low-Income Units must include at least 450 square feet and two-bedroom Low-Income Units must include at least 700 square feet of living space.

These limits may be waived for rehabilitation projects, at the discretion of the Executive Director, prior to application submission;

~~(F)~~(G) Emergency call systems shall only be required in units intended for occupancy by frail elderly populations requiring assistance with activities of daily living~~, and/or applying as special needs units~~. When required, they shall provide 24-hour monitoring, unless an alternative monitoring system is approved by the Executive Director;

(H) For projects exceeding 20 units, ~~C~~common areas shall be provided on site, or within approximately one-~~half~~quarter mile of the subject property~~. For purposes of this part, common areas~~ and shall include all interior amenity space, such as the rental office, community room, service space, computer labs, and gym, but shall not include laundry rooms or manager living units.

(i) Common areas shall meet the following minimum size requirement:

(a) 600 square feet for projects comprised of 21 to 30 ~~or less~~ total units.~~,~~

(b) ~~at least 600~~1,000 square feet for~~;~~ projects ~~from~~of 31 to 60 total units.~~,~~

(c) ~~at least 1,000~~1,400 square feet for~~;~~ projects ~~from~~of 61 to 100 total units.~~,~~

(d) ~~at least 1,400~~1,800 square feet for~~;~~ projects over 100 total units~~, at least 1,800 square feet~~.

(ii) ~~Small developments of 20 units or fewer are exempt from this requirement. These limits may be waived, at the discretion of t~~The Executive Director may waive the requirement of Subsection (g)(2)(H)(i)~~,~~ for ~~(G)~~ rehabilitation projects with existing common area;

~~(H)~~(I) A public agency shall provide direct or indirect long-term financial support for at least fifteen percent (15%) of the total project development costs, or the owner's equity (includes syndication proceeds) shall constitute at least thirty percent (30%) of the total project development costs;

~~(I)~~(J) Adequate laundry facilities shall be available on the project premises, with at least one washe~~r~~ing machine and one clothes dryer (washer and dryer) for every 15 units ~~in the project~~. This requirement shall be reduced by 25% for projects where all units have ~~in the project include~~ hook-ups for washers and dryers. ~~To the extent that~~If tenants are required to pay~~will be charged for the~~to use of central laundry facilities, washers and dryers must be excluded from eligible basis. If no centralized laundry facilities are provided, washers and dryers shall be provided in each of the project's units ~~in the project~~;

~~(J)~~(K) Projects are subject to a minimum low-income use period of 55 years (50 years for projects located on tribal trust land).

(3) Special Needs projects. To be considered Special Needs ~~housing~~, ~~at least~~ the greater of 15 Low-Income Units or ~~45%~~25% of the Low-Income Units in the project shall serve Special Needs~~serve~~ ~~p~~Population(s) ~~that meet one of the following: are individuals living with physical or sensory disabilities and transitioning from hospitals, nursing homes, development centers, or other care facilities; individuals living with developmental or mental health disabilities; individuals who are survivors of physical abuse; individuals who are homeless as described in Section 10315(b); individuals with chronic illness, including HIV; homeless youth as defined in Government Code Section 12957(e)(2); families in the child welfare system for whom the absence of housing is a barrier to family reunification, as~~

~~certified by a county; or another specific group determined by the Executive Director to meet the intent of this housing type. The Executive Director shall have sole discretion in determining whether or not an application meets these requirements~~. The 15 Low-Income Unit minimum shall not apply to projects with committed HUD Section 811 funding. For ~~A~~any development with~~that is~~ less than 75% of the Low-Income Units serving ~~s~~Special ~~n~~Needs Population(s), the non-Special Needs units ~~-~~shall either ~~meet one of the following criteria~~: (i) ~~the non-special needs Low-Income Units~~ meet the ~~l~~Large ~~f~~Family, ~~s~~Senior, or SRO housing type requirements; or (ii) ~~the non-special needs Low-Income Units~~ consist of at least 20% one-bedroom units and at least 10% larger than one-bedroom units. Special Needs~~The~~ applications shall also meet the following ~~additional threshold requirements~~:

(A) Average targeted income for the ~~s~~Special ~~n~~Needs units ~~is~~of no more than forty percent (40%) of ~~the area median income~~AMI and consistent with points requested in Section 10325(c)(6);

(B) The units/building configurations (including community space) shall meet the specific needs of the population, including kitchen needs for SRO units without full kitchens;

(C) If the project does not have a public rental or operating subsidy committed for all ~~s~~Special ~~n~~Needs units, the applicant shall explain, using the market study for support, how rent for tenants living in unsubsidized units will not exceed 30% of the tenants' incomes ~~demonstrate for these unsubsidized units that the target population(s) will not experience rent overburden, as supported by the market study. Rent overburden means the targeted rent is more than 30% of the target population(s) income~~;

(D) A public agency shall provide direct or indirect long-term financial support for at least fifteen percent (15%) of the total project development costs, or the owner's equity (includes syndication proceeds) shall constitute at least thirty percent (30%) of the total project development costs;

(E) Adequate laundry facilities shall be available on the project premises, with at least one washing~~er~~ machine and one clothes dryer (washer and dryer) for every 15 units ~~in the project~~. This requirement shall be reduced by 25% for projects where all units ~~in the project include~~ have hook-ups for washers and dryers. If tenants are required to pay to use central laundry facilities, washers and dryers must be excluded from eligible basis. If no centralized laundry facilities are provided, washers and dryers shall be provided in each of the project's units;

(F) Projects are subject to a minimum low-income use period of 55 years (50 years for projects located on tribal trust land);

(G) One-bedroom Low-Income Units must include at least 450 square feet, and two-bedroom Low-Income Units must include at least 700 square feet of living space. Three-bedroom Low-Income Units shall include at least 900 square feet of living space. These bedroom and size requirements may be waived for rehabilitation projects or for projects that received entitlements prior to January 1, 2016 at the discretion of the Executive Director;

(H) SRO units (as defined in Section 10302) are efficiency units that may include a complete private bath and kitchen but generally do not have a separate bedroom, unless the configuration of an already existing building being proposed to be used for an SRO dictates otherwise. The minimum size for SRO Low-Income Units shall be 200 square feet, and the size shall not exceed 500 square feet. These bedroom and size requirements may be waived for rehabilitation projects or for projects that received entitlements prior to January 1, 2016 at the discretion of the Executive

Director. A project that includes SRO units without complete private baths shall provide at least one bath for every eight SRO units;

~~(I) A signed contract or memorandum of understanding between the developer and the service provider must accompany the Tax Credit application; and~~

(I) A preliminary supportive service plan addressing the needs of the target Special Needs Population served is required and shall include:

(i) A description of the specific population to be served;~~that specifically identifies: the~~

(ii) A description of the specific service needs of the ~~projects special needs~~ population and the specific services to be provided;

(iii) Identification of the organization(s) that will provide services and a signed contract, memorandum of understanding, or commitment letters from the proposed service provider(s)~~would be providing the services to the residents; the services to be provided to the special needs population~~;

(iv) A description of how the services ~~would~~ support resident stability and any other service plan objectives;

(v) ~~a~~A preliminary budget ~~displaying~~describing anticipated income (all funding sources) and expenses associated with the services program; and~~.~~

(vi) Other information deemed necessary by ~~T~~the Executive Director, whom
~~(J)~~ ~~shall, in his/her sole discretion,~~ determines whether the plan is adequate to qualify the project as a special needs project.

(~~K~~J) If the project will be operated as senior housing pursuant to ~~f~~Fair ~~h~~Housing ~~l~~Laws, ~~then the project shall have an elevator for any building over two stories and~~and the project shall comply with~~meet~~ the ~~accessibility~~ requirements of Section 10325(g)(2)(B)-(D).

(~~L~~K) ~~With respect to~~ Special Needs projects must follow tenant screening, property management, and service delivery practices in accordance with Housing First ~~units designated for individuals who are homeless, owners, property managers, and service providers shall comply with the core components of Housing First, as defined in Welfare and Institutions Code Section 8255(b)~~.

(4) At-risk projects. To be considered At-risk housing, the application shall meet the requirements of R & T Code subsection 17058(c)(6~~4~~), except as further defined in subsection (B)(i) below, as well as the following additional threshold requirements, and other requirements as outlined in this subsection:

(A) Projects are subject to a minimum low-income use period of 55 years (50 years for projects located on tribal trust land); and

(B) Project application eligibility criteria include:

(i) before applying for Tax Credits, the project must meet the At-risk eligibility requirements under the terms of applicable federal and state law as verified by a third party legal opinion, except that a project that has been acquired by a qualified nonprofit organization within the past five years of the date of application with interim financing in order to preserve its affordability and that meets all other requirements of this section, shall be eligible to be considered an "at-risk" project under these regulations. A project application will not qualify in this category unless it is determined by the Committee that the project is at-risk of losing affordability on at least 50% of the restricted units due to market or other conditions. ~~-~~Excluding any restrictions recorded pursuant to paragraph (2) of subdivision (e) of section 65863.11 or section 65863.13 of the Government Code, ~~A~~a project will not be deemed at-risk of losing affordability if the project is subject to a rent restriction with a remaining term of at least five years that restricts incomes and rents on the restricted units to an average no greater than 60% of ~~area median income~~AMI;

(ii) the project, as verified by a third-party legal opinion unless the exception in B(i) above applies, must currently possess or have had within the past five years from the date of application, either:

(a) federal mortgage insurance, a federal loan guarantee, federal project-based rental assistance, or, have its mortgage held by a federal agency, or be owned by a federal agency; or

(b) loans or grants program administered by ~~the Department of Housing and Community Development (~~HCD~~)~~; or

(c) be currently subject to, or have been subject to, within five years preceding the application deadline, the later of Federal or State Housing Tax Credit restrictions whose compliance period is expiring or has expired within the last five years and at least 50% of whose units are not subject to any other rental restrictions beyond the term of the Tax Credit restrictions; or

(d) be currently subject to, or have been subject to, within five years preceding the application deadline, ~~California Debt Limit Allocation Committee (~~CDLAC~~)~~ bond regulatory agreement restrictions whose compliance period is expiring or has expired within the last five years and at least 50% of whose units are not subject to any other rental restrictions beyond the term of the CDLAC restrictions;

(iii) as of the date of application filing, the applicant shall have sought available federal incentives to continue the project as low-income housing, including, direct loans, loan forgiveness, grants, rental subsidies, renewal of existing rental subsidy contracts, etc.;

(iv) subsidy contract expiration, mortgage prepayment eligibility, or the expiration of Housing Tax Credit restrictions, as verified by a third party legal opinion, shall occur no later than five calendar years after the year in which the application is filed, except in cases where a qualified nonprofit organization acquired the property within the terms of (i) above and would otherwise meet this condition but for: 1) long-term use restrictions imposed by public agencies as a condition of their acquisition financing; or 2) HAP contract renewals secured by the qualified nonprofit organization for the maximum term available subsequent to acquisition;

(v) the applicant agrees to renew all project based rental subsidies (such as Section 8 HAP or Section 521 rental assistance contracts) for the maximum term available and shall seek additional renewals throughout the project's useful life, if applicable;

(vi) at least seventy percent (70%) of project tenants shall, at the time of application, have incomes at or below sixty percent (60%) of ~~area median income~~AMI;

(vii) the gap between total development costs (excluding developer fee), and all loans and grants to the project (excluding Tax Credit proceeds) must be greater than fifteen percent (15%) of total development costs; and,

(viii) a public agency shall provide direct or indirect long-term financial support of at least fifteen percent (15%) of the total project development costs, or the owner's equity (includes syndication proceeds) shall constitute at least thirty percent (30%) of the total project development cost.

(5) SRO projects. To be considered Single Room Occupancy (SRO) housing, the application shall meet the following additional threshold requirements:

(A) Average targeted income is no more than forty percent (40%) of the ~~area median income~~AMI and consistent with points requested in Section 10325(c)(6);

(B) At least 90% of all units shall be SRO units (as defined Section 10302). SRO units are efficiency or studio units that may include a complete private bath and kitchen but generally do not have a separate bedroom, unless the configuration of an already existing building being proposed to be used for an SRO dictates otherwise. The minimum size for SRO units shall be 200 square feet, and the size shall not exceed 500 square feet. These bedroom size requirements may be waived for rehabilitation projects, at the discretion of the Executive Director;

(C) At least one bath shall be provided for every eight units;

(D) If the project does not have a public rental or operating subsidy committed for all SRO units, the applicant shall explain, using the market study for support, how rent for tenants living in unsubsidized units will not exceed 30% of the tenants' incomes~~demonstrate for these unsubsidized units that the target population(s) will not experience rent overburden, as supported by the market study. Rent overburden means the targeted rent is more than 30% of the target population(s) income~~;

(E) The project configuration, including community space and kitchen facilities, shall meet the needs of the population, and comply with Section 10325(f)(7)(E);

(F) A public agency shall provide direct or indirect long-term financial support for at least fifteen percent (15%) of the total project development costs, or the owner's equity (includes syndication proceeds) shall constitute at least thirty percent (30%) of the total development cost;

(G) Adequate laundry facilities shall be available on the project premises, with at least one washing~~er~~ machine and one clothes dryer (washer and dryer) for every 15 units ~~in the project~~. This requirement shall be reduced by 25% for projects where all units have ~~in the project include~~ hook-ups for washers and dryers. If tenants are required to pay to use central laundry facilities, washers and dryers must be excluded from eligible basis. If no centralized laundry facilities are provided, washers and dryers shall be provided in each of the project's units;

(H) Projects are subject to a minimum low-income use period of 55 years (50 years for projects located on tribal trust land);

(I) A ten percent (10%) vacancy rate shall be used unless otherwise approved by the Executive Director. Justification of a lower rate shall be included;

(J) New construction projects for seniors shall not qualify as SRO housing.

(h) Waiting List. At the conclusion of the last reservation cycle of any calendar year, and at no other time, the Committee may establish a Waiting List of pending applications in anticipation of utilizing any Tax Credits that may be returned to the Committee, and/or that have not been allocated to projects with the Set-Asides or Geographic Regions for which they were intended. The Waiting List shall expire at midnight on December 31 of the year the list is established. During periods without a waiting list, complete credit awards returned by successful geographic apportionment competitors shall be returned to the apportionment of origin.

Staff shall score, rank and evaluate applications on the Waiting List and make selections from the Waiting List as follows:

(1) If Credits are fully returned from projects originally funded under Set-Asides or Geographic Apportionments, applications qualifying under the same Set-Aside or Geographic Region will be selected in the order of their ranking. With respect to such a Set-Aside, one or more projects shall receive a reservation until all Credits in a Set-Aside are reserved. With respect to such Geographic Regions in which credits remain available, projects will be funded in order of their rank so long as the region's last award does not cause the region's aggregate award amount to exceed 125 percent (125%) of the amount originally available for that region in that funding round. When the next highest-ranking project does not meet the 125% rule, the Committee shall not fund a project requesting a smaller credit award.

(2) Next, Waiting List projects in Set Asides or Geographic Apportionments that are not yet fully subscribed will be selected from the Waiting List for reservations. These will be selected first from the Set Asides in order of their funding sequence, and then from the Geographic Apportionments in the order of the highest to the lowest percentage by which each Apportionment is undersubscribed. (This will be calculated by dividing the unreserved Tax Credits in the apportionment by the total Apportionment.)

(3) Finally, after all Set-Asides and Geographic Apportionments for the current year have been achieved, or if no further projects are available for such reservations, the unallocated Tax Credits will be used for projects selected from the Waiting List, in the order of their score and tie breaker performance ranking, without regard to Set-Aside or Geographic Region. All Waiting List project reservations, except for Rural projects, will be counted toward the projects' Geographic Apportionments.

(4) If there are not sufficient federal Tax Credits to fully fund the next ranked application on the Waiting List, a reservation of all remaining federal Tax Credits and a binding commitment of the following year federal Tax Credits may be made to that application.

(i) Carry forward of Tax Credits. Pursuant to Federal and state statutes, the Committee may carry forward any unused Tax Credits or Tax Credits returned to the Committee for allocation in the next calendar year.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10326. Application Selection Criteria - Tax-Exempt Bond Applications.

(a) General. All applications requesting Federal Tax Credits under the requirements of IRC Section 42(h)(4) for buildings and land, the aggregate basis (including land) of which is financed at least fifty percent (50%) by tax-exempt bonds, shall be eligible to apply under this Section for a reservation and allocation of Federal Tax Credits. Those projects requesting State Tax Credits pursuant to subsection (g)(1)(A) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code will also be subject to the applicable requirements of Section 10317. All applicants requesting Tax Credits for projects financed with tax-exempt bonds shall apply simultaneously to the ~~California Debt Limit Allocation Committee (~~CDLAC~~)~~ and CTCAC and shall use the CDLAC-CTCAC Joint Application. Applications will be eligible for a reservation of tax credits only if receiving a bond allocation pursuant to a joint application.

(b) Applicable criteria. Selection criteria for applications reviewed under this Section shall include those required by IRC Section 42(m), this Section 10326, and Sections 10300, 10302, 10305, 10320, 10322, 10327, 10328(e), 10330, 10335, and 10337 of these regulations. Other sections of these regulations shall not apply. The first funding round shall be the first application review period of a calendar year for tax-exempt bond financed projects.

(1) Subject to conditions described in these Regulations, reservations of Federal and State Tax Credits shall be made for those applications that receive a bond allocation from CDLAC until the established State Tax Credit allocation amount is exhausted. If the last application requires more State Tax Credits than remain for the calendar year, that application will not be funded, and the remaining credits will be either funded through the Waiting List or carried forward into the next calendar year. If there is not sufficient State Tax Credits to allocate to applications recommended for tax-exempt bonds by CDLAC, the State Tax Credits will be allocated based on ranking within the CDLAC pools and set asides in the following order:

(A) Black, Indigenous, or Other People of Color (BIPOC) Project Pool;
(B) Rural Project Pool;
(C) New Construction Pool, Homeless Projects Set Aside;
(D) New Construction Pool, ELI/VLI Project Set Aside;
(E) New Construction Pool, Mixed-Income Project Set Aside; and
(F) All remaining New Construction Pool Projects

(2) For State Tax Credits pursuant to Section 10317(j) of these Regulations, an amount up to $200,000,000 in a calendar year may be allocated for housing financed by CalHFA's Mixed-Income Program (MIP) that also receives a bond allocation from CDLAC. Applications with financing by CalHFA (MIP) will be accepted in any funding round. The amount allocated for CalHFA MIP may be reduced upon agreement of the Executive Directors of CalHFA and CTCAC.

At the conclusion of the final funding round of a calendar year, the Committee may establish a Waiting List of pending applications in anticipation of utilizing any State Tax Credits that may be returned to the Committee, and/or that have not been allocated to projects for which they were intended. The Waiting List shall expire on December 31 of the year the list is established.

(c) Application review period. The Committee may require up to sixty (60) days to review an application, and an additional thirty (30) days to consider the application for a reservation of Tax Credits. Applicants must deliver applications no less than ninety (90) days prior to the CTCAC Committee meeting in which they wish to obtain a decision. Applications not expected to receive a bond allocation from CDLAC due to relatively low CDLAC scores may or may not be fully evaluated by the CTCAC.

Applications requesting State Tax Credits allocated pursuant to subsections (g)(1)(A) and (B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code and not in compliance with the application completeness requirements of Sections 10322(d) and (e) of these Regulations shall be considered incomplete and shall be disqualified from receiving a reservation of Tax Credits during the cycle in which the application was determined incomplete.

(d) Issuer determination of Credit. The issuer of the bonds may determine the Federal Tax Credit amount, with said determination verified by the Committee and submitted with the application. The issuer may request the Committee determine the Credit amount by including such request in the application.

(e) Additional application requirements. Applications submitted pursuant to this Section shall provide the following additional information:

(1) the name, phone number and contact person of the bond issuer; and,

(2) verification provided by the bond issuer of the availability of the bond financing, the actual or estimated bond issuance date, and the actual or estimated percentage of aggregate basis (including land) financed or to be financed by the bonds, and a certification provided by a third-party tax professional as to the expected or actual aggregate basis (including land) financed by the proceeds of tax-exempt bonds;

(3) the name, phone number and contact person of any entity providing credit enhancement and the type of enhancement provided.

(f) Application evaluation. To receive a reservation of Tax Credits, applications submitted under this Section shall be evaluated, pursuant to IRC Section 42, H & S Code Sections 50199.4 through 50199.22, R & T Code Sections 12206, 17058, and 23610.5, and these regulations to determine if: eligible, by meeting all program eligibility requirements; complete, which includes meeting all basic threshold requirements; and financially feasible.

(g) Basic thresholds. An application shall be determined to be complete by demonstration of meeting the following basic threshold requirements. All basic thresholds shall be met at the time the application is filed through a presentation of conclusive, documented evidence to the Executive Director's satisfaction. Further, in order to be eligible to be considered for Tax Credits under these regulations, the general partner(s) and management companies must not have any significant outstanding noncompliance matters relating to the tenant files or physical conditions at any Tax Credit properties in California, and any application submitted by an applicant with significant outstanding compliance matters will not be considered until the Committee has received evidence satisfactory to it that those matters have been resolved.

(1) Housing need and demand. Applicants shall provide evidence that the type of housing proposed, including proposed rent levels, is needed and affordable to the targeted population within the community in which it is located as set forth in Section 10325(f)(1). ~~Evidence shall be conclusive and include the most recent documentation available (prepared within one year of the application date). Evidence of housing need and demand shall include:~~

~~(A) evidence of public housing waiting lists by bedroom size and tenant type, if available, from the local housing authority; and~~

~~(B) a market study as described in Section 10322(h)(10) of these regulations, which provides evidence that the items set forth in Section 10325(f)(1)(B) have been met for the proposed tax-exempt bond project.~~

~~Market studies will be assessed thoroughly. Meeting the requirements of Section 10325(f)(1)(B) is essential, but because other elements of the market study will also be considered, meeting those requirements in Section 10325(f)(1)(B) will not in itself show adequate need and demand for a proposed project or ensure approval of a given project.~~

(2) Demonstrated site control. Applicants shall provide evidence that the subject property is, and will remain within the control of the applicant from the time of application submission as set forth in Section 10325(f)(2).

(3) Local approvals and Zoning. Applicants shall adhere to the local approvals and zoning requirements set forth in Section 10325(f)(4)~~provide evidence that the project, as proposed, is zoned for the intended use, and has obtained all applicable local land use approvals which allow the discretion of local elected officials to be applied. Applicants requesting competitive state credits shall provide this evidence at the time the application is filed,~~

~~except that an appeal period may run 30 days beyond the application due date, in which case the applicant must provide proof that either no appeals were filed, or that any appeals filed during that time period were resolved within that 30-day period and the project is ready to proceed. Examples of such approvals include, but are not limited to, general plan amendments, rezonings, conditional use permits. Notwithstanding the first sentence of this subsection, applicants need not have obtained design review approval at the time of application. The Committee may require, as evidence to meet this requirement, submission of a Committee-provided form letter to be signed by an appropriate local government planning official of the applicable local jurisdiction~~.

(4) Financial feasibility. Applicants shall provide the financing plan for the proposed project consistent with Section 10325(f)(5).

(5) Sponsor characteristics. Applicants shall provide evidence that as a Development Team, proposed project participants possess the knowledge, skills, experience and financial capacity to successfully develop, own and operate the proposed project. The Committee shall, in its sole discretion, determine if any of the evidence provided shall disqualify the applicant from participating in the Tax Credit Programs, or if additional Development Team members need be added to appropriately perform all program requirements. General partners and management companies lacking documented experience with Section 42 requirements using the minimum scoring standards at Section 10325(c)(1)(A) and (B) shall be required to complete training as prescribed by CTCAC per Section 10325(c)(1) prior to a project's placing in service. The minimum scoring standards referenced herein shall not be obtained through the two (2) point category of "a housing tax credit certification examination of a nationally recognized housing tax credit compliance entity on a list maintained by the Committee to satisfy minimum management company experience requirements for an incoming management agent" established at Section 10325(c)(1). Applicants need not submit the third-party public accountant certification that the projects have maintained a positive operating cash flow.

The State Tax Credit allocation pursuant to subsection (g)(1)(B) of Sections 12206, 17058, and 23610.5 of the Revenue and Taxation Code received by individuals, entities, affiliates, and related entities is limited to no more than thirty-three percent (33%) of any amount established per application review period as described in Section 10326(c) of these Regulations. This limitation is applicable to a project applicant, developer, sponsor, owner, general partner, and to parent companies, principals of entities, and family members. For the purposes of this section, related or non-arm's length relationships are further defined as those having control or joint control over an entity, having significant influence over an entity, or participating as key management of an entity. Related entity disclosure is required at the time of application. This 33% limit is not applicable for reservations of State Tax Credits made after the month of May in each calendar year.

(6) Minimum construction standards. Applicants shall adhere to minimum construction standards as set forth in Section 10325(f)(7).

(7) Minimum Rehabilitation Project Costs. Projects involving rehabilitation of existing buildings shall be required to complete, at a minimum, the higher of:

(A) $15,000 in hard construction costs per unit; or

(B) 20% of the adjusted basis of the building pursuant to IRC Section 42(e)(3)(A)(ii)(I).

(8) (A) Existing tax credit projects applying for additional tax credits for acquisition and/or rehabilitation (i.e., resyndication) shall maintain the rents and income targeting levels in the existing regulatory contract for the duration of the new regulatory contract. If the project has exhibited negative cash flow for at least each of the last three years or within the next five years will lose a rental or operating subsidy that was factored into the project's initial feasibility, the Executive Director may alter this

requirement, provided that the new rents and income targeting levels shall be as low as possible to maintain project feasibility. In addition, the Executive Director may approve a reduction in the number of units for purposes of unrestricting a manager's unit, adding or increasing service or community space, or for adding bathrooms and kitchens to SRO units, provided that the existing rent and income targeting remain proportional.

(B) If the regulatory agreement for an existing tax credit project applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication) contains a requirement to provide service amenities, even if that requirement has expired, the project shall provide a similar or greater level of services for a period of at least 15 years under the new regulatory agreement. A project obtaining maximum CDLAC points for services shall be deemed to have met this requirement. If the project has exhibited cash flow of less than $20,000 for at least each of the last three years, has no hard debt and fails to break even in year 15 with services, or within the next five years will lose a rental or operation subsidy that was factored into the project's initial feasibility, the Executive Director may alter this requirement, provided that the service expenditures shall be the maximum that project feasibility allows.

(C) For existing tax credit projects applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication), the pre-rehabilitation reserve study in the CNA shall demonstrate a rehabilitation need of at least $5,000 per unit over the first three years. Projects for which the Executive Director has waived the requirements of Section 10320(b)(4) and projects with ten years or less remaining on the CTCAC regulatory agreement are exempt from this requirement.

(9) A non-competitive project that includes Low-Income Units targeted at greater than 60% AMI shall have average targeting that does not exceed 60% AMI. A competitive project that includes Low-Income Units targeted at greater than 60% AMI shall have average targeting that does not exceed 50% AMI. Projects electing the average income federal set-aside must choose targeting in 10% increments of ~~Area Median Income~~AMI (i.e. 20% AMI, 30% AMI, 40% AMI, etc.).

A project with a tax credit reservation dated prior to, or a submitted application pending as of, March 26, 2018 may, with the discretionary approval of the Executive Director, revise its targeting prior to the recordation of the regulatory agreement to include Low-Income Units targeted at greater than 60% AMI only to increase the number of Low-Income Units or to accommodate existing over-income tenants, provided that the average targeting does not exceed 60% AMI for non-competitive projects or 50% AMI for competitive projects.

A project including Low-Income Units targeted at greater than 60% AMI shall make the "Yes" election on line 8b of the IRS Form 8609.

(h) Reserved.

(i) Tax-exempt bond reservations. Reservations of Tax Credits shall be subject to conditions as described in this Section and applicable statutes. Reservations of Tax Credits shall be conditioned upon the Committee's receipt of the reservation fee described in Section 10335 and an executed reservation letter bearing the applicant's signature accepting the reservation within twenty (20) calendar days of the Committee's notice to the applicant of the reservation, except that Hybrid projects and simultaneous phased projects as defined in Section 10327(c)(2)(C) shall submit the acceptance of the reservation for the first application within five (5) business days of the Committee's notice to the applicant of the reservation for the corresponding second application.

(j) Additional conditions on reservations. The following additional conditions shall apply to reservations of Tax Credits pursuant to this Section:

(1) Bonds issued. Bonds shall be issued within the time limit specified by CDLAC, if applicable; and,

(2) Projects shall maintain at least 10% of the total Low-Income Units at rents affordable to tenants earning 50% or less of the ~~Area Median Income~~AMI and shall maintain a minimum 30 year affordability period.

(3) Projects proposing the rehabilitation of existing structures shall provide CTCAC with an updated development timetable by December 31 of the year following the year the project received its reservation of Tax Credits.

(i) The report shall include the actual placed-in-service date or the anticipated placed-in-service date for the last building in the project and the date the project achieved full occupancy. The report shall detail the causes for any change from the original date.

(ii) Projects proposing new construction shall provide CTCAC with an updated development timetable by December 31 of the second year following the year the project received its reservation of Tax Credits. The update shall include the actual placed-in-service date for the last building in the project and the date that the project achieved full occupancy; or the date the project is anticipated to achieve full occupancy.

Other conditions, including cancellation, disqualification and other sanctions imposed by the Committee in furtherance of the purposes of the Credit programs.

(4) Projects intended for eventual tenant homeownership must submit, at application, evidence of a financially feasible program, incorporating, among other items, an exit strategy, home ownership counseling, funds to be set aside to assist tenants in the purchase of units, and a plan for conversion of the facility to home ownership at the end of the initial 15-year compliance period. In such a case, the regulatory agreement will contain provisions for the enforcement of such covenants.

(k) Placed-in-service. Upon completion of construction of the proposed project, the applicant shall submit documentation required by Section 10322(i).

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10327. Financial Feasibility and Determination of Credit Amounts.

(a) General. Applicants shall demonstrate that the proposed project is financially feasible as a qualified low-income housing project. Development and operational costs shall be reasonable and within limits established by the Committee, and the Committee may adjust these costs and any corresponding basis at any time prior to issuance of tax forms. Approved sources of funds shall be sufficient to cover approved uses of funds, except that initial application errors resulting in a shortage of sources up to the higher of $100,000 or 50% of the contingency line item shall be deemed covered by the contingency line item. If it is determined that sources of funds are insufficient, an application shall be deemed not to have met basic threshold requirements and shall be considered incomplete. Following its initial and subsequent feasibility determinations, the Committee may determine a lesser amount of Tax Credits for which the proposed project is eligible, pursuant to the requirements herein, and may rescind a reservation or allocation of Tax Credits in the event that the maximum amount of Tax Credits achievable is insufficient for financial feasibility.

(b) Limitation on determination. A Committee determination of financial feasibility in no way warrants to any applicant, investor, lender or others that the proposed project is, in fact, feasible.

(c) Reasonable cost determination. IRC Section 42(m) requires that the housing Credit dollar amount allocated to a project not exceed the amount the housing Credit agency determines is necessary for the financial feasibility of the project. The following standards shall apply:

(1) Builder overhead, profit and general requirements. An overall cost limitation of fourteen percent (14%) of the cost of construction shall apply to builder overhead, profit, and general requirements, excluding builder's general liability insurance. For purposes of builder overhead and profit, the cost of construction includes offsite improvements, demolition and site work, structures, prevailing wages, and general requirements. For purposes of general requirements, the cost of construction includes offsite improvements, demolition and site work, structures, and prevailing wages. Project developers shall not enter into fixed-price contracts that do not account for these restrictions and shall disclose any payments for services from the builder to the developer.

(2) Developer Fee.

(A) The maximum developer fee that may be included in project costs and eligible basis for 9% competitive credit new construction, rehabilitation only, or adaptive reuse applications applying under Section 10325 of these regulations is the lesser of 15% of the project's unadjusted eligible basis and 15% of the basis for non-residential costs included in the project allocated on a pro rata basis or two million five hundred thousand dollars ($2,500,000). The maximum developer fee that may be included in project costs and eligible basis for a 9% competitive credit acquisition/rehabilitation application is the lesser of 15% of the project's unadjusted eligible construction related basis plus 5% of the project's unadjusted eligible acquisition basis and 15% for the basis for non-residential costs included in the project allocated on a pro rata basis or two million five hundred thousand dollars ($2,500,000).

Notwithstanding the paragraph above, for projects which restrict for ~~persons with~~ Special Needs Population(s) ~~as described in Section 10325(g)(3)~~ the greater of 1) 15 Low-Income Units or 2) 25% of the Low-Income Units, the maximum developer fee that may be included in project costs and eligible basis for 9% competitive credit new construction, rehabilitation only, or adaptive reuse applications applying under Section 10325 of these regulations is the lesser of 15% of the project's unadjusted eligible basis and 15% of the basis for non-residential costs included in the project allocated on a pro rata basis or two million eight hundred thousand dollars ($2,800,000). The maximum developer fee that may be included in project costs and eligible basis for a 9% competitive credit acquisition/rehabilitation application is the lesser of 15% of the project's unadjusted eligible construction related basis plus 5% of the project's unadjusted eligible acquisition basis and 15% for the basis for non-residential costs included in the project allocated on a pro rata basis or two million eight hundred thousand dollars ($2,800,000).

(B) For 4% credit applications applying under Section 10326 of these regulations, the maximum developer fee that may be included in project costs and eligible basis shall be as follows:

(i) For new construction, rehabilitation only, or adaptive reuse projects, the maximum developer fee is the sum of 15% of the project's unadjusted eligible basis and 15% of the basis for non-residential costs included in the project allocated on a pro rata basis.

All developer fees in excess of the greater of the following shall be deferred or contributed as equity to the project:

- 15% of the project's unadjusted eligible basis, up to two million five hundred thousand dollars ($2,500,000); or
- one million dollars ($1,000,000) plus 5% of the project's unadjusted eligible basis in excess of six million six hundred sixty six thousand six hundred sixty seven dollars ($6,666,667).

Notwithstanding the paragraph above, for projects which restrict for ~~persons with~~ Special Needs Population(s) ~~as described in Section 10325(g)(3)~~ the greater of 1) 15 Low-Income Units or 2) 25% of the Low-Income Units, all developer fees in excess of the greater of the following shall be deferred or contributed as equity to the project:

- 15% of eligible basis, up to two million eight hundred thousand dollars ($2,800,000); or
- one million dollars ($1,000,000) plus 7% of eligible basis in excess of six million six hundred sixty six thousand six hundred sixty seven dollars ($6,666,667).

(ii) For acquisition/rehabilitation projects, the maximum developer fee is 15% of the unadjusted eligible construction related basis and 5% of the unadjusted eligible acquisition basis and 15% of the basis for non-residential costs included in the project allocated on a pro rata basis. 15% of the project's unadjusted eligible acquisition basis will be permitted for at-risk developments meeting the requirements of section 10325(g)(4) or for other acquisition/rehabilitation projects, except for existing tax credit projects applying for a new reservation of tax credits for acquisition (i.e. resyndication), whose hard construction costs per unit in rehabilitation expenditures are at least $50,000 or where the development will restrict at least 30% of its Low Income Units for those with incomes no greater than 50% of area median and restrict rents concomitantly.

All developer fees in excess of the greater of the following shall be deferred or contributed as equity to the project:

- 15% of the project's unadjusted eligible construction related basis plus 5% of the project's unadjusted eligible acquisition basis, up to two million five hundred thousand dollars ($2,500,000); provided however, and subject to the $2,500,000 limitation in the aggregate, 15% of the project's unadjusted eligible acquisition basis will be permitted for at-risk developments meeting the requirements of section 10325(g)(4) or for other acquisition/rehabilitation projects, except for existing tax credit projects applying for a new reservation of tax credits for acquisition (i.e. resyndication), whose hard construction costs per unit in rehabilitation expenditures are at least $50,000 or where the development will restrict at least 30% of its Low Income Units for those with incomes no greater than 50% of area median and restrict rents concomitantly; or
- one million dollars ($1,000,000) plus 5% of the project's unadjusted eligible basis in excess of six million six hundred sixty-six thousand six hundred sixty seven dollars ($6,666,667).

Notwithstanding the paragraph above, for projects which restrict for ~~persons with~~ Special Needs Population(s) ~~as described in Section 10325(g)(3)~~ the greater of 1) 15 Low-Income Units or 2) 25% of the Low-Income Units, all developer fees in excess of the greater of the following shall be deferred or contributed as equity to the project:

- 15% of the project's unadjusted eligible construction related basis plus 5% of the project's unadjusted eligible acquisition basis, up to two million eight hundred thousand dollars ($2,800,000); provided however, and subject to the $2,800,000 limitation in the aggregate, 15% of the project's unadjusted eligible acquisition basis will be permitted for at-risk developments meeting the requirements of section 10325(g)(4) or for other acquisition/rehabilitation projects, except for existing tax credit projects applying for a new reservation of tax credits for acquisition (i.e. resyndication), whose hard construction costs per unit in rehabilitation expenditures are at least $50,000 or where the development will restrict at least 30% of its Low Income Units for those with incomes no greater than 50% of area median and restrict rents concomitantly; or

- one million dollars ($1,000,000) plus 7% of the project's unadjusted eligible basis in excess of six million six hundred sixty-six thousand six hundred sixty seven dollars ($6,666,667).

(iii) Notwithstanding (i) and (ii), effective through December 31, 2028, any developer fee in excess of $6,000,000 shall be deferred or contributed as equity to the project. Prior to December 31, 2028, the Committee shall meet to discuss the application of any developer fee in excess of $6,000,000.

(C) For purposes of this subsection, the unadjusted eligible basis is determined without consideration of the developer fee. With exception of 4% projects with a 2016 or later reservation, the developer fee in cost and in basis shall not be increased once established by a reservation of Tax Credits but may be decreased in the event of a modification in basis. Once established by a reservation of Tax Credits, the developer fee in cost and in basis for a 4% project with a 2016 or later reservation may increase or decrease in the event of modification in basis, and in the cases it is increased, any increase above the maximum developer fee established at reservation shall be additionally deferred or contributed as equity to the project. The maximum developer fees above apply to projects developed as multiple simultaneous phases using the same credit type: (2)(A) applies to all simultaneous phases using all 9% credits and (2)(B) above applies to all simultaneous phases using all 4% credits. Only when the immediately preceding phase of an all 9% credit phased project equals or exceeds 150 units or when any other phased project is using both credit types shall the provision of (2)(A) and (2)(B) apply to each phase independently. For purposes of this limitation, unless waived by the Executive Director, "simultaneous" refers to projects consisting of a single building, or projects on the same parcel or on parcels within ¼ mile of each other and with construction start dates within six months of each other, or completion dates that are within six months of each other.

(D) Deferred fees and costs. Deferral of project development costs shall not exceed an amount equal to seven-and-one-half percent (7.5%) of the unadjusted eligible basis of the proposed project prior to addition of the developer fee. Unless expressly required by a State or local public funding source, in no case may the applicant propose deferring project development costs in excess of half (50%) of the proposed developer fee. Tax-exempt bond projects shall not be subject to this limitation.

Deferred developer fee notes and/or agreements must be included in the placed-in-service application and the interest rates of such notes shall not exceed eight percent (8%).

(E) Black, Indigenous, or Other People of Color (BIPOC). For projects that qualify for general partner experience pursuant to Section 5230(f)(1)(B) of the CDLAC Regulations, the 15% of project's unadjusted eligible construction related basis stated in Section 10327(c)(2)(B) shall be increased to 20% of the project's unadjusted eligible construction related basis and the two million five hundred thousand ($2,500,000) dollars in subsection (c)(2)(B) above, is increased to three million ($3,000,000) dollars.

(3) Syndication expenses. A cost limitation on syndication expenses, excluding bridge loan costs, shall be twenty percent (20%) of the gross syndication proceeds, if the sale of Tax Credits is through a public offering or private Securities and Commission Regulation D offering, and ten percent (10%) of the gross syndication proceeds, if the sale is through a private offering. The Executive Director may allow exceptions to the above limitation, in amounts not to exceed twenty-four percent (24%) for public offerings and private Securities and Exchange Commission Regulation D offerings, and fifteen percent (15%) for private offerings, should the following circumstances be present: smaller than average project size; complex financing structure due to multiple sources; complex land lease or ownership structure; higher than average investor yield requirements, due to higher than average investor risk; and, little or no anticipated project cash allowing lower-than-market investor returns. Syndication costs cannot be included as a cost or included in eligible basis.

(4) Net syndication proceeds. The Executive Director shall evaluate the net syndication proceeds to ensure that project sources do not exceed uses and that the sale of Tax Credits generates proceeds equivalent to amounts paid in comparable syndication raises. The Executive Director shall determine the minimum tax credit factor to be used in all initial applications prior to the beginning of a funding cycle for projects applying under Section 10325 for both Federal and State Tax Credits. The minimum tax credit factor for initial applications made under Section 10326 shall be adjusted annually based on current market conditions.

(5) Threshold Basis Limits. At application, the Committee shall limit the unadjusted eligible basis amount, used for calculating the maximum amount of Tax Credits to amounts published on its website in effect at the time of application and in accordance with the Threshold Basis Limit definition in Section 10302 of these regulations. At placed in service, the Committee shall limit the unadjusted eligible basis amount to the higher of the amount published on its website in effect at the time of application or in effect for the year the project places in service.

Exceptions to limits.

(A) Increases in the threshold basis limits shall be permitted as follows for projects applying under Section 10325 or 10326 of these regulations.

A twenty percent (20%) increase to limits for a development that is paid for in whole or in part out of public funds and is subject to a legal requirement for the payment of state or federal prevailing wages on the entire project or financed in part by a labor-affiliated organization that requires the employment of construction workers who are paid at least state or federal prevailing wages. An additional five percent (5%) increase to the unadjusted eligible basis shall be available for projects that certify that they are subject to a project labor agreement within the meaning of Section 2500(b)(1) of the Public Contract Code that requires the employment of construction workers who are paid at least state or federal prevailing wages or that they will use a skilled and trained workforce, as defined in Section 25536.7 of the Health and Safety Code, to perform all onsite work within an apprenticeable occupation in the building and construction trades. All applicants under this paragraph shall certify that contractors and subcontractors will comply with Section 1725.5 of the Labor Code, if applicable;

A ten percent (10%) increase to the limits for a new construction development where parking is required to be provided beneath the residential units (but not “tuck under” parking) or through construction of an on-site parking structure of two or more levels;

A two percent (2%) increase to the limits where a day care center is part of the development;

A two percent (2%) increase to the limits where 100% of the Low-Income Units are for special needs populations;

A ten percent (10%) increase to the limits for a development wherein at least 95% of the project's upper floor units are serviced by an elevator.

A fifteen percent (15%) increase to the limits for a development wherein at least 95% of the building(s) is constructed as Type I as defined in the California Building Code, in which case, the Type III increase below (10%) shall not be allowed.

A ten percent (10%) increase to the limits for a development wherein at least 95% of the building(s) is constructed as (1) a Type III as defined in the California Building Code, or (2) a Type III/Type I combination, in which case, the Type I increase above (15%) shall not be allowed.

With the exception of the prevailing wage increase, the Local Impact Fee increase, and the special needs increase, in order to receive the basis limit increases by the corresponding percentage(s) listed above, a certification signed by the project architect shall be provided within the initial and placed-in-service application confirming that item(s) listed above will be or have been incorporated into the project design, respectively.

(B) A further increase of up to ~~ten~~twenty percent (~~10%~~20%) in the Threshold Basis Limits will be permitted for projects applying under Section 10325 or Section 10326 of these regulations that include one or more of the following energy efficiency/resource conservation/indoor air quality items:

(1) All electric. Twenty percent (20%)

(2) For rehabilitation projects, electric ready as defined in Section 160.9 of the 2022 Building Energy Efficiency Standards. Fifteen percent (15%)

~~(1)~~(3) Project shall have onsite renewable generation estimated to produce 50 percent (50%) or more of annual tenant electricity use. If the combined available roof area of the project structures, including carports, is insufficient for provision of 50% of annual electricity use, then the project shall have onsite renewable generation based on at least 90 percent (90%) of the available solar accessible roof area. Available solar accessible area is defined as roof area less north facing roof area for sloped roofs, equipment, solar thermal hot water and required local or state fire department set-backs and access routes. A project not availing itself of the 90% roof area exception may also receive an increase under paragraph (2) only if the renewable generation used to calculate each basis increase does not overlap. Five percent (5%)

~~(2)~~(4) Project shall have onsite renewable generation estimated to produce 75 percent (75%) or more of annual common area electricity use. If the combined available roof area of the project structures, including carports, is insufficient for provision of 75% of annual electricity use, then the project shall have onsite renewable generation based on at least 90 percent (90%) of the available solar accessible roof area. Available solar accessible area is defined as roof area less north facing roof area for sloped roofs, equipment, solar thermal hot water and required local or state fire department set-backs and access routes. A project not availing itself of the 90% roof area exception may also receive an increase under paragraph (1) only if the renewable generation used to calculate each basis increase does not overlap. Two percent (2%)

~~(3)~~(5) Newly constructed project buildings shall be 15% more energy efficient than the applicable Building Energy Efficiency Standards (Energy Code, California Code of Regulations, Title 24) for energy efficiency alone (not counting solar)~~, except that if the local building department has determined that building permit applications submitted on or before December 31, 2019 are complete, then newly constructed project buildings shall be fifteen percent (15%) or more energy efficient than the 2016 Energy Efficiency Standards (California Code of Regulations, Title 24)~~. Four percent (4%)

~~(4)~~(6) Rehabilitated project buildings shall have eighty percent (80%) decrease in estimated TDV energy use (or improvement in energy efficiency) post rehabilitation as demonstrated using the appropriate performance module of CEC approved software. Four percent (4%)

~~(5)~~(7) Irrigate only with reclaimed water, greywater, or rainwater (excepting water used for Community Gardens) or irrigate with reclaimed water, grey water, or rainwater in an amount that annually equals or exceeds 20,000 gallons or 300 gallons per unit, whichever is less. One percent (1%)

~~(6)~~(8) Community Gardens of at least 60 square feet per unit. Permanent site improvements that provide a viable growing space within the project including solar access, fencing, watering systems, secure storage space for tools, and pedestrian access. One percent (1%)

~~(7)~~(9) Install bamboo, stained concrete, cork, salvaged or FSC-Certified wood, natural linoleum, natural rubber, or ceramic tile in all kitchens, living rooms, and bathrooms (where no VOC adhesives or backing is also used). One percent (1%)

~~(8)~~(10) Install bamboo, stained concrete, cork, salvaged or FSC-Certified wood, natural linoleum, natural rubber, or ceramic tile in all interior floor space other than units (where no VOC adhesives or backing is also used). Two percent (2%)

(~~9~~11) For new construction projects, meet all requirements of the U.S. Environmental Protection Agency Indoor Air Plus Program. Two percent (2%)

Compliance and Verification: For placed-in-service applications, in order to receive the increase to the basis limit, the application shall contain a certification from a HERS, GreenPoint, NGBS Green Verifier, PHIUS, Passive House, or Living Building Challenge Rater, or from a LEED for Homes Green Rater verifying that item(s) listed above have been incorporated into the project, except that items (~~5~~7) through (~~8~~10) may be verified by the project architect. For items (~~1~~3) through (6), the applicant must submit a certification from a third-party certified HERS Rater ~~Sustainable Building Method Workbook. The applicant shall use CBECC/CUAC software approved by the California Energy Commission to determine the solar output and the tenants' estimated usage. For item (2), the energy analyst shall provide documentation of the load serving the common area and the output calculations of the photovoltaic generation. For items (3) and (4), the applicant must submit a Sustainable Building Method Workbook~~ with the original application and the placed-in-service application. For item (~~5~~7), the Rater, architect, landscape architect, or water system engineer shall certify that reclaimed water, greywater, or rainwater systems have been installed and are functioning to supply sufficient irrigation to the property to meet the standards under normal conditions. Failure to incorporate the features, or to submit the appropriate documentation may result in a reduction in credits awarded and/or an award of negative points.

(C) Additionally, for projects applying under Section 10326 of these regulations, an increase of one percent (1%) in the threshold basis limits shall be available for every 1% of the project's Low-Income and Market Rate Units that will be income and rent restricted at or below 50 percent (50%) but above thirty-five percent (35%) of ~~Area Median Income (~~AMI~~)~~. An increase of two percent (2%) shall be available for every 1% of the project's Low-Income and Market Rate Units that will be restricted at or below 35% of AMI. In addition, the applicant must agree to maintain the affordability period of the project for 55 years (50 years for projects located on tribal trust land).

(D) Projects requiring seismic upgrading of existing structures, and/or projects requiring on-site toxic or other environmental mitigation may be permitted an increase in basis limit equal to the lesser of the amount of costs associated with the seismic upgrading or one-site environmental mitigation or 15% of the project's unadjusted eligible basis to the extent that the project architect or seismic engineer certifies in the application to the costs associated with such work.

(E) An increase equal to any Local Development Impact Fees as defined in Section 10302 of these regulations if the fees are documented in the application submission by the entities charging such fees.

(F) In a county that has an unadjusted 9% threshold basis limit for a 2-bedroom unit equal to or less than $500,000, a ten percent (10%) increase to the project's threshold basis limit for a development located in a census tract, or census block group as applicable, designated on the CTCAC/HCD Opportunity Area Map as Highest or High Resource.

An applicant may choose to utilize the census tract, or census block group as applicable, resource designation from the CTCAC/HCD Opportunity Maps in effect when the initial site control was obtained up to seven calendar years prior to the application.

(6) Acquisition costs. All applications must include the cost of land and improvements in the Sources and Uses budget, except that (i) competitive projects with donated land and/or improvements shall include the appraised value of the donated land and improvements that is not nominal, and (ii) projects on tribal trust land need only provide an improvement cost or value. If the acquisition for a new construction project involves a Related Party, the applicant shall disclose the relationship at the time of initial application.

Once established in the initial application, the acquisition cost of a new construction site shall not increase except as provided below for land and improvements donated or leased. Except as allowed pursuant to Section 10322(h)(9)(A) or by a waiver pursuant to this section below for projects basing cost on assumed debt, neither the purchase price nor the basis associated with existing improvements, if any, shall increase during all subsequent reviews including the placed-in-service review.

If land or land and improvements (real property) are donated to the general partner or member of the project owner and if approved by CTCAC in advance, the general partner or member may sell the real property to the project for an amount equal to the donated value established in the application provided that: there must be a seller carryback loan for the full amount of the sale, the loan must be "soft," having a term of at least 15 years, a below market interest rate and interest accrual, and be either fully deferred or require only residual receipts payments for the loan term. Alternatively, the value may be a capital contribution of a general partner or member. Once established in the initial application, the donated value of the real property shall not increase.

If land or land and improvements (real property) are donated or are leased for a mandatory lease payment of $100 per year or less, and if approved by CTCAC in advance, the donation value established in the application may be a capital contribution of a general partner or member. Once established in the initial application, the donated value of the real property/lease shall not increase.

(A) New Construction. The cost of land acquired through a third-party transaction with an unrelated party shall be evidenced by a sales agreement, purchase contract, or escrow closing statement. The value of land acquired from a Related Party shall be underwritten using the lesser of the current purchase price or appraised value pursuant to Section 10322(h)(9). If the purchase price exceeds appraised value, the applicant shall, within the shortfall calculation section of the basis and credits page of the application only, reduce the project cost and the soft permanent financing by the overage. For all other purposes, the project cost shall include the overage.

The value of donated land, including land donated as part of an inclusionary housing ordinance, must be evidenced by an appraisal pursuant to Section 10322(h)(9).

(B) Rehabilitation. Except as noted below, the applicant shall provide a sales agreement or purchase contract in additional to the appraisal. The value of land and improvements shall be underwritten using the lesser amount of the purchase price or the "as is" appraised value of the subject property (as defined in Section 10322(h)(9)) and its existing improvements without consideration of the future use of the property as rent restricted housing except if the property has existing long term rent restrictions that affect the as-is value of the property. The land value shall be based upon an "as if vacant" value as determined by the appraisal methodology described in Section 10322(h)(9) of these regulations. If the purchase price is less than the appraised value, the savings shall be prorated between the land and improvements based on the ratio in the appraisal. If the purchase price exceeds appraised value, the applicant shall (i) limit improvements acquisition basis to the amount supported by the appraisal and (ii) within the shortfall calculation section of the basis and credits page of the application only, reduce the project cost and the soft permanent financing, exclusive of any developer fee that must be deferred or contributed pursuant to Section 10327(c)(2)(B), by the overage. For all other purposes, the project cost shall include the overage.

The Executive Director may approve a waiver to underwrite the project with a purchase price in excess of the appraised value where (i) a local governmental entity is purchasing, or providing funds for the purchase of land for more than its appraised value in designated revitalization area when the local governmental entity has determined that the higher cost is justified, or (ii) the purchase price does not exceed the sum of third-party debt encumbering the property that will be assumed or paid off.

For tax-exempt bond-funded properties receiving credits under Section 10326 only or in combination with State Tax Credits and exercising the option to forgo an appraisal pursuant to Section 10322(h)(9)(A), no sales agreement or purchase contract is required, and CTCAC shall approve a reasonable proration of land and improvement value consistent with similar projects in the market area.

(7) Reserve accounts. All reserve accounts shall be used to maintain the property (which does not include repayment of loans) and/or benefit its residents, and shall remain with the project except as provided in subparagraph (B) below and except when a public lender funds rent subsidy and/or service reserves and requires repayment of unused rent subsidy and/or service reserves. If ownership of a project is transferred, the reserve accounts may be purchased by the purchaser(s) or transferee(s) for an amount equal to the reserve account(s) balance(s).

(A) The minimum replacement reserve deposit for projects shall be three hundred dollars ($300) per unit per year, or for new construction or senior projects, two hundred fifty dollars ($250) per unit per year. The on-going funding of the replacement reserve in this amount shall be a requirement of the regulatory agreement during the term of the agreement, and the owner shall maintain these reserves in a segregated account. Funds in the replacement reserve shall only be used for capital improvements or repairs.

(B) An operating reserve shall be funded in an amount equal to three months of estimated operating expenses and debt service under stabilized occupancy. Additional funding will be required only if withdrawals result in a reduction of the operating reserve account balance to 50% or less of the originally funded amount. An equal, verified operating reserve requirement of any other debt or equity source may be used as a substitute, and the reserve may be released following achievement of a minimum annual debt service ratio of 1.15 for three consecutive years following stabilized occupancy only to pay deferred developer fee. The Committee shall allow operating reserve amounts in excess of industry norms to be considered "reasonable costs," for purposes of this subsection, only for homeless assistance projects under the Non-Profit Set-Aside, as described in Section 10315(b), Special Needs projects, HOPE VI projects, or project-based Section 8 projects. The original Sources and Uses budget and the final cost certification shall demonstrate the initial and subsequent funding of the operating reserves.

(8) Applicant resources. If the applicant intends to finance part or all of the project from its own resources or a Related Party's resources (other than deferred fees), the applicant shall be required to prove, to the Executive Director's satisfaction, that such resources are available and committed solely for this purpose, including an audited certification from a third party certified public accountant that applicant has sufficient funds to successfully accomplish the financing. Public entities are exempt from this requirement.

(9) Self-syndication. If the applicant or a Related Party intends to be the sole or primary tax credit investor in a project, the project shall be underwritten using a tax credit factor (i.e., price) of $1 for each dollar of federal tax credit and $.79 dollars for each dollar of State Tax Credit, unless the applicant proposes a higher value.

(d) Determination of eligible and qualified basis. The Committee shall provide forms to assist applicants in determining basis. The Committee shall rely on certification from an independent, qualified Certified Public Accountant for determination of basis; however, the Committee retains the right to disallow any basis it determines ineligible or inappropriate.

(1) High-Cost Area adjustment to eligible basis. Proposed projects located in a qualified census tract or difficult development area, as defined in IRC Section 42(d)(5)(c)(iii), may qualify for a thirty percent (30%) increase to eligible basis, subject to Section 42, applicable California statutes and these regulations. Pursuant to Authority granted by IRC §42(d)(5)(B)(v), CTCAC designates credit ceiling applications relating to sites that have lost their difficult development area or qualified census tract status within the previous 12 months as a difficult development area (DDA).

(2) Pursuant to Authority granted by IRC §42(d)(5)(B)(v), CTCAC designates credit ceiling applications proposing a project meeting the Special Needs housing type threshold requirements at Section 10325(g)(3) as a difficult development area (DDA).

(3) Pursuant to authority granted by IRC §42(d)(5)(B)(v), CTCAC designates credit ceiling applications seeking state credits for which there are insufficient state credits as a difficult development area (DDA).

(4) Pursuant to authority granted by IRC §42(d)(5)(B)(v), CTCAC designates credit ceiling applications for Federal Credit established by the Further Consolidated Appropriations Act, 2020 or the Consolidated Appropriations Act, 2021 as a difficult development area (DDA).

(e) Determination of Credit amounts. The applicant shall determine, and the Committee shall verify, the maximum allowable Tax Credits and the minimum Tax Credits necessary for financial feasibility, subject to all conditions of this Section. For purposes of determining the amount of Tax Credits, the project's qualified basis shall be multiplied by an applicable Credit percentage established by the Executive Director, prior to each funding cycle. The percentage shall be determined taking into account recently published monthly Credit percentages.

(f) Determination of feasibility. To be considered feasible, a proposed project shall exhibit positive cash flow after debt service for a 15-year minimum term beginning at stabilized occupancy, or in the case of acquisition/rehabilitation projects, at the completion of rehabilitation. "Cash flow after debt service" is defined as gross income (including (1) all rental income generated by proposed initial rent levels contained within the project application and (2) committed federal, state, and local rental subsidies; excluding income generated by tenant-based rental subsidies) minus vacancy, operating expenses, property taxes, service and site amenity expenses, operating and replacement reserves and must pay debt service (not including residual receipts debt payments). Expenses that do not continue through all 15 years of the pro forma shall be excluded from the evaluation of feasibility as well as from the minimum debt service coverage ratio and cash flow parameters pursuant to Section 10327(g)(6). For applications that qualify for a reservation of Tax Credits: (1) from the Nonprofit set-aside homeless assistance apportionment, (2) with special needs units comprising at least 25% of the low-income units, or (3) with an average targeted affordability of 40% of ~~Area Median Income~~AMI or less, capitalized operating reserves in excess of the 3-month minimum amount may be added to gross income for purposes of determining "cash flow after debt service." In addition, applications with a committed capitalized operating subsidy reserve from HCD, CalHFA, or another public entity approved by the Executive Director may add withdrawals from this reserve to gross income for purposes of determining "cash flow after debt service."

(g) Underwriting criteria. The following underwriting criteria shall be employed by the Committee in a pro forma analysis of proposed project cash flow to determine the minimum Tax Credits necessary for financial feasibility and the maximum allowable Tax Credits. The Committee shall allow initial applicants to correct cash flow shortages or overages up to the higher of $25,000 or 0.5% of gross income at placed in service. In addition, if the operating expenses are below the published amount pursuant to subparagraph (1), the CTCAC Executive Director may correct the error by increasing the operating expenses to the published amount, provided the increase maintains compliance with all other feasibility and underwriting criteria.

(1) The 15-year pro forma revenue and expense projection calculations shall utilize a two-and-one-half percent (2.5%) increase in gross income, a three-and-one-half percent (3.5%) increase in operating expenses (excluding operating and replacement reserves set at prescribed amounts), and a two percent (2%) increase in property taxes.

(A) Where a private conventional lender and project equity partner use a 2% gross income and 3% operating expense increase underwriting assumption, CTCAC shall accept this methodology as well.

(B) For projects with a HUD rental subsidy that will receive a subsidy layering review from CTCAC, CTCAC shall accept 2% gross income, 3% operating expense increase, and 7% vacancy underwriting assumptions.

For purposes of the pro forma projections only, the application form Subsidy Contract Calculation may utilize post-rehabilitation rental subsidy contract rent assumptions when applicable.

Minimum operating expenses shall include expenses of all manager units and market rate units and must be at least equal to the minimum operating expense standards published by the Committee staff annually. The published minimums shall be established based upon periodic calculations of operating expense averages annually reported to CTCAC by existing tax credit property operators. The minimums shall be displayed by region, and project type (including large family, senior, and Special Needs), and shall be calculated at the reported average or at some level discounted from the reported average. The Executive

Director may, in his/her sole discretion, utilize operating expenses up to 15% less than required in this subsection for underwriting when the equity investor and the permanent lender are in place and provide evidence that they have agreed to such lesser operating expenses. These minimum operating expenses do not include property taxes, replacement reserves, depreciation or amortization expense, compliance monitoring or lender fees, or the costs of any site or service amenities.

Special needs projects that are less than 100% special needs shall prorate the operating expense minimums, using the special needs operating expenses for the special needs units, and the other applicable operating expense minimums for the remainder of the units.

(2) Property tax expense minimums shall be one percent (1%) of total replacement cost, unless:

(A) the verified tax rate is higher or lower;
(B) the proposed sponsorship of the applicant includes an identified 501(c)(3) corporate general partner which will pursue a property tax exemption; or
(C) the proposed sponsorship of the applicant includes a Tribe or tribally-designated housing entity.

(3) Vacancy and collection loss rates shall be ten percent (10%) for special needs units and non-special needs SRO units without a significant project-based public rental subsidy, unless waived by the Executive Director based on vacancy data in the market area for the population to be served. Vacancy and collection loss rates shall be between five and ten percent (5-10%) for special needs units and non-special needs SRO units with a significant project-based public rental subsidy. Vacancy and collection loss rates shall be five percent (5%) for all other units.

(4) Loan terms, including interest rate, length of term, and debt service coverage, shall be evidenced as achievable and supported in the application, or applicant shall be subject to the prevailing loan terms of a lender selected by the Committee.

(5) Variable interest rate permanent loans shall be considered at the underwriting interest rate, or, alternatively, at the permanent lender's underwriting rate upon submission of a letter from the lender indicating the rate used by it to underwrite the loan. All permanent loan commitments with variable interest rates must demonstrate that a "ceiling" rate is included in the loan commitment or loan documentation. If not, the permanent loan will not be accepted by CTCAC as a funding source.

(6) Minimum and Maximum Debt Service Coverage. An initial debt service coverage ratio equal to at least 1.15 to 1 in at least one of the project's first three years is required, except for FHA/HUD projects, RHS projects or projects financed with hard debt by the California Housing Finance Agency. Debt service does not include residual receipts debt payments. Except for projects in which less than 50% of the units are Tax Credit Units or where a higher first year ratio is necessary to meet the requirements of subsection 10327(f) (under such an exception the year-15 cash flow shall be no more than the greater of 1) two percent (2%) of the year-15 gross income or 2) the lesser of $500 per unit or $25,000 total), "cash flow after debt service" shall be limited to the higher of twenty-five percent (25%) of the anticipated annual must pay debt service payment or eight percent (8%) of gross income, during each of the first three years of project operation. Gross income includes rental income generated by proposed initial rent levels contained with the project application.

9% credit applications without a HUD subsidy layering review: A pro forma statement utilizing CTCAC underwriting requirements and submitted to CTCAC at initial application; application at 180 days or 194 days pursuant to Section 10328(c); and placed in service application review must demonstrate that this limitation is not exceeded during the first three years of the project's operation.

All other applications: A pro forma statement utilizing CTCAC underwriting requirements and submitted to CTCAC at initial application; application at 180 days or 194 days pursuant to Section 10328(c); and if applicable, application at subsidy layering review must demonstrate that this limitation is not exceeded during the first three years of the project's operation. For these applications, effective November 1, 2019 CTCAC underwriting requirements for placed in service applications currently under review pursuant to Section 10322(i) are eliminated.

(7) The income from the residential portion of a project shall not be used to support any negative cash flow of a commercial portion. Alternatively, the commercial income shall not support the residential portion. Applicants must provide an analysis of the anticipated commercial income and expenses. At placed in service, an applicant with commercial space shall provide a written communication from the hard lender specifying the portion of the loan that is underwritten with commercial income and, if greater than zero, the corresponding annual commercial debt service payments.

(8) Existing tax credit projects applying for a new reservation of tax credits for acquisition and/or rehabilitation (i.e., resyndication) that are subject to the hold harmless rent provisions of the federal Housing and Economic Recovery Act of 2008 (HERA) at application may, at the request of the applicant, be underwritten at the hold harmless rent limits to the extent that they do not exceed the elected federal set-aside current tax credit rent limits, except that the application of the rent adjuster shall be delayed for a number of years equal to the percentage difference between the hold harmless rent limits and the current tax credit rent limits, with the result divided by 2.5 and rounded to the nearest year. The new regulatory agreement shall reflect the current tax credit rent limits, but the project may continue to charge hold harmless HERA rents for units targeted below the elected federal set-aside (i.e., 40% of units at 60% AMI or 20% of units at 50% AMI) provided that the hold harmless rents do not exceed the rent level for the applicable elected federal set-aside and only until such time as the current tax credit rent limits equal or exceed the hold harmless rents.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10328. Conditions on Credit Reservations.

(a) General. All reservations of Tax Credits shall be conditioned upon:

(1) timely project completion;

(2) receipt of amounts of Tax Credits no greater than necessary for financial feasibility and viability as a qualified low-income housing project throughout the extended use period;

(3) income targets as proposed in the application; and,

(4) the rent increase limit rules in Section 10336(a)~~rents for a low-income household shall not increase in any 12-month period more than the lesser of five percent plus the percentage increase in the cost of living as defined in paragraph (3) of subdivision (g) of Section 1947.12 of the Civil Code or ten percent of the lowest rental rate charged for that household at any time during the 12 months prior to the effective date of the increase, except as follows:~~

~~(A) The Executive Director may grant a waiver to exceed this limit provided that the owner shows that the proposed rent increase is necessary to ensure financial stability or fiscal integrity of the property.~~

~~(B) An owner may exceed this limit without a waiver in the following circumstances:~~

~~(i) to increase the rent up to 30 percent of the monthly income of the household occupying the unit.~~

~~(ii) for projects with terminated project-based rental assistance or operating subsidy as described in Section 10337(a)(3)(B); or~~

~~(iii) a transfer of a household to another unit in the same property that has a different bedroom count or transfer to a higher AMI designation, as required by a public regulatory agreement or deed restriction, due to a change in the household's income or occupancy from initial qualification~~.

(b) Preliminary reservations. Preliminary reservations of Tax Credits shall be subject to conditions as described in this subsection and applicable statutes. Reservations of Tax Credits shall be conditioned upon the Committee's receipt of the performance deposit described in Section 10335 and an executed reservation letter bearing the applicant's signature accepting the reservation within twenty (20) calendar days of the Committee's notice to the applicant of the preliminary reservation, except that Hybrid projects and simultaneous phased projects as defined in Section 10327(c)(2)(C) shall submit the acceptance of the reservation for the first application within five (5) business days of the Committee's notice to the applicant of the reservation for the corresponding second application. However, should the 20-day period for returning the executed reservation letter continue past December 15 of any year, an applicant may be required to execute and return the reservation letter in less than twenty (20) days in order that the reservation be effective. Failure to comply with any shortened period would invalidate the reservation offer and permit the Committee to offer a reservation to the next eligible project.

(c) Except for those applying under section 10326 of these regulations, applicants receiving a Credit reservation but who did not receive maximum points in the Readiness to Proceed point category shall provide the Committee with a completed updated application form no later than 180 days or 194 days, as applicable, following Credit reservation and start construction no later than 12 months following Credit reservation. Failure to start construction within 12 months following Credit reservation may result in rescission of Credit reservation.

Upon receipt of the updated application form, the Committee shall conduct a financial feasibility and cost reasonableness analysis for the proposed project and determine if all conditions of the preliminary reservation have been satisfied. Substantive changes to the approved application, in particular, changes to the financing plan or costs, need to be explained by the applicant in detail, and may cause the project to be reconsidered by the Committee.

(d) Carryover Allocations. Except for those applying under section 10326 of these regulations, applicants receiving a Credit reservation shall satisfy either the Placed-in-service requirements pursuant to subsection 10322(i) or carryover allocation requirements in the year the reservation is made, pursuant to IRC Section 42(h)(1)(E) and these regulations, as detailed below. An application for a carryover allocation must be submitted no later than 20 days following the Credit reservation date, together with the applicable allocation fee, and all required documentation, except that the time for meeting the "10% test" and submitting related documentation, and owning the land, will be no later than twelve (12) months after the date of the carryover allocation. An application for a carryover allocation and allocation fee for the first application of a Hybrid project or a simultaneous phased project as defined in Section 10327(c)(2)(C) shall be submitted within five (5) business days of the Committee's notice to the applicant of the reservation for the corresponding second application.

(1) Additional documentation and analysis. The Executive Director may request, and the holder of a Credit reservation shall provide, additional documentation required for processing a carryover allocation.

(2) In addition to the requirements of the Internal Revenue Code, to receive a carryover allocation an applicant shall provide evidence that applicant has maintained site control from the time of the initial application and, if the land is not already owned, will continue to maintain site control until the time for submitting evidence of the land's purchase.

(3) Certification. The Committee shall require a certification from an applicant that has received a reservation, that the facts in the application continue to be true before a carryover allocation is made.

(e) Placed-in-service. The applicant shall submit documentation required by Section 10322(i).

(f) Additional Conditions to Reservations and Allocations of Tax Credits. Additional conditions, including cancellation, disqualification and other sanctions may be imposed by the Committee in furtherance of the purposes of the Tax Credits programs, including any remedial actions imposed on Tax Credit recipients under sections 14052 and 14053 of title 2 of the California Code of Regulations.

(g) Reservation Exchange. A project with a reservation of Federal Credit pursuant to Section 10325 and a carryover allocation pursuant to Section 10328(d) and IRC Code § 42(h)(1)(E) that meets any of the following criteria may elect to return all of the Federal Credit in exchange for a new reservation and allocation of Federal Credits. The reservation and carryover allocation of the Federal Credits returned pursuant to this subdivision shall be deemed cancelled by mutual consent pursuant to a written agreement executed by the Committee and the applicant specifying the returned credit amount and the effective date on which the credits are deemed returned. The Committee shall concurrently issue a new reservation of Federal Credits to the project in the amount of the Federal Credits returned by the project to the Committee.

(1) A High-Rise Project that returns all of the Federal Credit only during January of the calendar year immediately following the calendar year in which the initial reservation and carryover allocation were made.

(2) A project that prior to the placed-in-service deadline merits additional time to place in service when development was significantly delayed during construction due to physical damage to the development directly caused by a disaster, including but not limited to, fires, floods, or earthquakes. In considering a request the Executive Director may consider at their~~his or her~~ sole discretion, among other things, the extent of the damage, the length of the delay, the time remaining until the project's placed in service deadline, and the circumstances causing the physical damage.

(3) A project reserved Federal credit established by the Further Consolidated Appropriations Act, 2020 or the Consolidated Appropriations Act, 2021 that returns all of the Federal Credit only during January of the calendar year immediately following the calendar year in which the initial reservation and carryover allocation were made.

(4) A Waiting List project that returns all of the Federal Credit only during the calendar year immediately following the calendar year in which the initial reservation and carryover allocation were made.

(5) Notwithstanding paragraph (4), a Waiting List project that returns all of the Federal Credit prior to December 31, 2023, immediately following when the initial reservation and carryover allocation were made.

(6) A project reserved and allocated Federal Credit that returns all of the Federal Credit due to circumstances beyond the applicant's control and subject to the prior written approval of the Executive Director at their~~his or her~~ sole discretion.

(h) CTCAC may contract with accountants and contractors or construction engineers to review the accuracy and reasonableness of a subset of final cost certifications submitted each year. The owner of a project selected for review and the accountant who prepared the final cost certification for such a project shall provide all requested information and generally facilitate the review.

Note: Authority cited: Section 50199.17, Health and Safety Code.

Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10330. Appeals.

(a) Availability. An applicant shall not appeal the Committee staff evaluation of another applicant's application. An appeal may only be filed under the following circumstances:

(1) determination of the application point score;

(2) disqualification from participation in the program ~~pursuant to~~under ~~subs~~Section 10325(c);

(3) disqualification of an incomplete application under Section 10322;

(4) qualification for "additional threshold requirements," pursuant to ~~subs~~Section 10325(g);

(5) ~~and,~~ determination of the Credit amount~~, pursuant to~~ under Section 10327;

(6) forfeiture of a performance deposit under Section 10335(e);

(7) negative points assigned by the Executive Director under Section 10325(c)(2); and

~~(3)~~(8) A fine imposed under Section 10337(f).

(b) (1) Procedure for application appeals. An appeal related to an application must be submitted in writing and received by CTCAC staff no later than five (5) calendar days following the transmittal date of the staff's point or disqualification letter. The appeal shall identify ~~specifically, based upon previously submitted application materials,~~ the applicant's grounds for the appeal and be based upon previously submitted application materials except as permitted under Section 10322(e).

Staff will respond in writing to the appeal letter within five (5) calendar days after receipt of the appeal letter. If the applicant wishes to appeal the staff response, the applicant may appeal in writing to the Executive Director no later than five (5) calendar days following the transmittal date of the staff response letter. The Executive Director will respond in writing within ~~five~~ten (~~5~~10) calendar days after receipt of the appeal letter. If the applicant wishes to appeal the Executive Director's decision, a final appeal may be submitted to the Committee no more than five (5) calendar days following the transmittal date of the Executive Director's letter. An appeal to the Committee must be accompanied by a five hundred dollar ($500) non-refundable fee payment payable to CTCAC. No Committee appeals will be addressed without this payment. The appeal review shall be based upon the existing documentation submitted by the applicant when the application was filed, except as provided under Section 10322(e). Any appeal or response due on a weekend or holiday shall be deemed to be due on the following business day.

(2) Procedure for negative point or fine appeals. An appeal related to negative points or a fine must be submitted in writing and received by the Executive Director no later than fourteen (14) calendar days following the transmittal of a negative point or fine letter, unless the Executive Director grants an extension which shall not exceed fourteen (14) additional days. The appeal shall identify specifically the appellant's ground for the appeal. The Executive Director will respond in writing no more than ~~seven~~ten (~~7~~10) calendar days after receipt of the appeal, unless the appellant requests an extension to accommodate a meeting with the Executive Director. If the appellant wishes to appeal the Executive Director's decision, a final appeal may be submitted to the Committee no more than seven (7) calendar days following the date of receipt of the Executive Director's letter. An appeal to the Committee must be accompanied by a five hundred dollar ($500) non-refundable fee payment payable to CTCAC. No Committee appeals will be addressed without this payment.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10335. Fees and Performance Deposit.

(a) Application fee.

(1) Every applicant for non-competitive tax credits shall be required to pay an application filing fee of $1,500. Scattered site applications and resyndication applications shall be required to pay an application filing fee of $1,700. This fee shall be paid to the Committee and shall be submitted with the application. This fee is not refundable.

(2) Every applicant for competitive tax credits shall be required to pay an application filing fee of $2,500, except for projects with sites within the jurisdictions of multiple Local Reviewing Agencies (LRA) for which applicants shall be required to pay an additional $1,000 application fee for each additional LRA. This fee shall be paid to the Committee and shall be submitted with the application. This fee is not refundable. Applicants reapplying in the same calendar year for an essentially similar project on the same project site shall be required to pay an additional $1,500 filing fee to be considered in a subsequent funding round, regardless of whether any amendments are made to the re-filed application. At the request of the applicant and upon payment of the applicable fee by the application filing deadline, applications remaining on file will be considered as is, or as amended, as of the date of a reservation cycle deadline. It is the sole responsibility of the applicant to amend its application prior to the reservation cycle deadline to meet all application requirements of these regulations, and to submit a "complete" application in accordance with Section 10322. $1,000 of the initial application filing fee shall be provided to each official LRA which completes a project evaluation for the Committee. A LRA may waive its portion of the application filing fee. Such waiver shall be evidenced by written confirmation from the LRA, included with the application.

(b) Allocation fee. Every applicant who receives a reservation of Tax Credits, except tax-exempt bond project applicants, shall be required to pay an allocation fee equal to four percent (4%) of the dollar amount of the first year's Federal Credit amount reserved. Reservations of Tax Credits shall be conditioned upon the Committee's receipt of the required fee paid to the Committee prior to execution of a carryover allocation or issuance of tax forms, whichever comes first. This fee is not refundable.

(c) Appeal fee. Any applicant submitting an appeal to the Committee shall pay a fee of five hundred dollars ($500) to CTCAC. The fee must accompany the appeal letter to the Committee.

(d) Reservation fee. Tax-exempt bond project applicants receiving Credit reservations shall be required to pay a reservation fee equal to one percent (1%) of the annual Federal Tax Credit reserved. Reservations of Tax Credits shall be conditioned upon the Committee's receipt of the required fee within twenty (20) days of issuance of a tax-exempt bond reservation, except that Hybrid projects and simultaneous phased projects as defined in Section 10327(c)(2)(C) shall submit the reservation fee for the first application within five (5) business days of the Committee's notice to the applicant of the reservation for the corresponding second application, or prior to the issuance of tax forms, whichever is first.

(e) Performance deposit. Each applicant receiving a preliminary reservation of Federal, or Federal and State (including State Farmworker), Tax Credits shall submit a performance deposit equal to four percent (4%) of the first year's Federal Credit amount reserved, but not to exceed $100,000, including applicants with a reservation of credit on or after October 14, 2020. Notwithstanding the other provisions of this subsection, an applicant requesting Federal Tax Credits not subject to the Federal housing Credit Ceiling and requesting State Tax Credits or State Farmworker Tax Credits, shall be required to submit a performance deposit in an amount equal to two percent (2%) of the first year's State Credit amount reserved for the project, but not to exceed $100,000. Notwithstanding the other provisions of this Section, an applicant requesting only Federal Tax Credits not subject to the Federal Credit Ceiling, shall not be required to submit a performance deposit.

(1) Timing and form of payment. The performance deposit shall be paid to the Committee within twenty (20) calendar days of the Committee's notice to the applicant of a preliminary reservation, except that Hybrid projects and simultaneous phased projects as defined in Section 10327(c)(2)(C) shall submit the performance deposit for the first application within five (5) business days of the Committee's notice to the applicant of the reservation for the corresponding second application.

(2) Returned Tax Credits. If Tax Credits are returned after a reservation has been accepted, the performance deposit is not refundable, with the following exceptions. Projects unable to proceed due to a natural disaster, a lawsuit, or similar extraordinary circumstance that prohibits project development may be eligible for a refund. Requests to refund a deposit shall be submitted in writing for Committee consideration. Amounts not refunded are forfeited to the Committee. All forfeited funds shall be deposited in the occupancy compliance monitoring account to be used to help cover the costs of performing the responsibilities described in Section 10337.

(3) Refund or forfeiture. To receive a full refund of the performance deposit, the applicant shall do all of the following: place the project in service under the time limits permitted by law; qualify the project as a low-income housing project as described in Section 42; meet all the conditions under which the reservation of Tax Credits was made; certify to the Committee that the Tax Credits allocated will be claimed; and, execute a regulatory agreement for the project. If the Committee cancels a Credit because of misrepresentation by the applicant either before or after an allocation is made, the performance deposit is not refundable. If the project is completed, but does not become a qualified low-income housing project, the performance deposit is not refundable.

(4) Appeals. An applicant may appeal the forfeiture of a performance deposit, by submitting in writing, a statement as to why the deposit should be refunded. The appeal shall be received by the Committee not later than seven (7) calendar days after the date of mailing by the Committee of the action from which the appeal is to be taken. The Executive Director shall review the appeal, make a recommendation to the Committee, and submit the appeal to the Committee for a decision.

(f) Compliance monitoring fee. The Committee shall charge a $700 per low-income unit fee to cover the costs associated with compliance monitoring throughout the extended-use period. Generally, payment of the fee shall be made prior to the issuance of Federal and/or State tax forms. Assessment of a lesser fee, and any alternative timing for payment of the fee, may be approved at the sole discretion of the Executive Director and shall only be considered where convincing proof of financial hardship to the owner is provided. Nothing in this subsection shall preclude the Committee from charging an additional fee to cover the costs of any compliance monitoring required, but an additional fee shall not be required prior to the end of the initial 15 year compliance period.

(g) Tax form revision fee. An owner who requests an amendment to 8609 or 3521A tax forms, including a request that occurs after CTCAC completes the drafting of these forms, shall pay a fee of $1000 unless the Executive Director determines that the amendment is necessary due to a CTCAC error.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10336. Laws, Rules, Guidelines, and Regulations for Tenants of Low-Income Units.

(a) Rent Increase Limit.

(1) Gross rents for a low-income household shall not increase in any 12-month period more than the lesser of five percent plus the percentage increase in the cost of living as defined in paragraph (3) of subdivision (g) of Section 1947.12 of the Civil Code or ten percent of the lowest rental rate charged for that household at any time during the 12 months prior to the effective date of the increase, except as follows:

(A) to increase the rent up to 30 percent of the monthly income of the household occupying the unit.

(B) for projects with terminated project-based rental assistance or operating subsidy as described in Section 10337(a)(3)(B); or

(C) a transfer of a household to another unit in the same property that has a different bedroom count or transfer to a higher AMI designation, as required by a public regulatory agreement or deed restriction, due to a change in the household's income or occupancy from initial qualification

(2) The Executive Director may grant a waiver to exceed the limit prescribed in subdivision (a)(1) if the waiver is consistent with the CTCAC Rent Increase Limit Waiver Memorandum, available on the CTCAC website and incorporated herein by reference, and the owner shows that the proposed rent increase is necessary to ensure financial stability or fiscal integrity of the property and does not unreasonably impact the tenants. A waiver denial is subject to the appeals process in Section 10330.

(3) In the notice required to be provided to tenants under Civil Code section 827, owners shall provide sufficient information explaining why the rent increase does not exceed programmatic maximum rents and the requirements of subdivision (a)(1) or (a)(2), if applicable. The explanation shall be in plain and accessible language and include the name, telephone number, and email address for a representative who can answer the tenant's questions about the rent increase.

(4) On or before June 30, 2026, and annually thereafter, the Executive Director shall assess the limit established pursuant to subdivision (a) and may make a recommendation to the Committee to adjust the limit based on the assessment.

(5) The requirements of this subdivision shall apply to all properties subject to a CTCAC regulatory agreement except that the requirements of this subdivision shall apply to properties that received an allocation of tax credits prior to April 3, 2024, starting January 1, 2025.

(6) Failure to comply with the provisions of this subdivision may result in the assessment of negative points under Section 10325(c)(2)(R) and fines under Section 10337(f)

(b) All projects shall adopt the following policies and procedures in furtherance of the Fair Housing Laws and Housing and Accessibility Requirements in compliance with Section 10322(h)(1)(F) and submit them to CTCAC upon request:

(1) To the furthest extent applicable and subject to federal preemption, owners, property managers, and service providers must comply with all relevant laws, including, without limitation, the Fair Housing Laws, the Housing and Accessibility Requirements, and Housing First.

(2) The owners, property managers, and service providers, as applicable, must do the following:

(A) Adopt a written nondiscrimination policy requiring that no person shall, on the grounds of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, age, medical condition, genetic information, citizenship, primary language, immigration status (except where explicitly prohibited by federal law), criminal history, arbitrary characteristics, and all other classes of individuals protected from discrimination under federal or state Fair Housing Laws, individuals perceived to be a member of any protected class, individuals having a record of membership in a protected class, or any individual or person associated with any protected class be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity benefiting in whole or in part from Tax Credits.

(B) Adopt a written tenant selection policy in clear, intelligible, and unambiguous language that complies with state and federal law, include the Fair Housing Laws, and is consistent with any Housing Type requirements, including Housing First.

(i) All new and existing projects with Accessible Housing Units shall adopt a process to market information about Accessible Housing Units to eligible individuals with disabilities and take reasonable nondiscriminatory steps to maximize use of Accessible Units by eligible individuals with disabilities requiring accessibility features. When an Accessible Housing Unit becomes vacant, the owner or property manager shall offer the unit:

(a) First, to a current occupant of another unit of the same project, or comparable projects under common control, having a disability requiring the accessibility features of the vacant unit and occupying a unit not having such features, or if no such occupant exists, then

(b) Second, to an eligible qualified applicant on the waiting list having a disability requiring the accessibility features of the vacant unit.

(c) If no applicant meeting the criteria in subsections (a) or (b) is available, the Accessible Housing Unit may be offered to a tenant or applicant who does not need the unit's accessibility features.

(d) When offering an Accessible Housing Unit to an applicant not having a disability requiring the accessibility features of the unit, the owner or manager shall require the applicant to agree to move to a non-accessible unit when a comparable unit is available. This agreement shall be incorporated in the lease or a lease addendum.

(ii) To the extent possible, projects where one or more of the Low-Income Units is restricted to occupancy by Chronically Homeless or Homeless must fill vacancies for such units with local CES referrals of people experiencing Homelessness or At-Risk of Homelessness. Where the CES system is not operational, referrals shall be through another similar system compliant consistent with WIC Section 8255, subdivision (b)(3).

(a) If the local CES system fails to refer a tenant within 30 days of written notification of a vacancy, units may be occupied by tenants referred from other sources consistent with WIC Section 8255, subdivision (b)(3).

(b) Where the local office of the U.S. Department of Veterans Affairs is not participating in a CES, vacancies may be filled with those Veterans who are referred directly by that local office.

(c) If acuity (the severity of presenting issues) is used as the basis for selecting tenants, it must be measured using the VI-SPDAT or some other standardized assessment tool approved by the Executive Director.

(C) Adopt and implement a written policy for providing reasonable accommodations, reasonable modifications, and auxiliary aids and services for effective communication with residents and applicants with disabilities. All project owners must provide notice in plain language and accessible formats to tenants in units with adaptable features of their ability to request conversion of the adaptable features to make their unit more accessible.

(D) Develop and implement an affirmative fair housing marketing plan consistent with HUD's equal opportunity regulations at 24 CFR part 200, subpart M.

(E) Where applicable, ensure individuals are not denied assistance, evicted, or have their assistance terminated because of their status as survivors of domestic violence, dating violence, sexual assault, or stalking, or for being affiliated with a victim, pursuant to 34 USC Section 12491. Owners and managers have an obligation to inform such prospective and existing tenants of the rights and protections available to them under federal law by providing them with a Notice of Occupancy Rights Form HUD-5380 and VAWA Self-Certification Form HUD-5382. Notice must be given at the time an applicant is denied housing, at the time an applicant is admitted to housing, or when a tenant is notified of eviction or termination. Owners and managers are also required to comply with additional protections afforded to survivors under state law pursuant to Civil Code Section 1946.7 (early lease termination without penalty) and Civil Code Sections 1941.5 and 1941.6.

(F) Adopt a policy allowing service animals as of right, reasonable accommodations for assistance under FEHA, and tenants to own or otherwise maintain one or more common household pets pursuant to the Pet Friendly Housing Act of 2017. (HSC § 50466).

(G) Unless required by another federal, state, or local program, adopt a tenant grievance and appeal procedure to resolve grievance filed by tenants and appeals of adverse actions taken by owners or managers regarding tenant occupancy of a Low-Income Unit, and prospective tenants' applications for occupancy.

(i) The grievance and appeal procedure shall be subject to CTCAC review upon request and, at a minimum, shall include:

(a) A requirement for the delivery to each tenant and applicant of a written copy of the appeal and grievance procedure;

(b) Procedures for informal dispute resolution;

(c) A right to a hearing before an impartial body, which shall consist of one or more persons with the power to render a final decision on the appeal or grievance; and

(d) Procedures for the conduct of an appeal or grievance hearing and the appointment of an impartial body.

(ii) Neither use of, nor participation in any of the appeal and grievance procedures shall constitute a waiver of or affect the rights of the tenant, prospective tenant, or Owner to a trial de novo or judicial review in any judicial proceeding which may thereafter be brought in the matter or the rights to file a judicial or administrative complaint under applicable Fair Housing Laws.

(H) Provide meaningful language access to Limited English Proficiency (LEP) tenants that, at a minimum, includes a written language access plan providing for the translation of notices concerning tenants' rights and the provision of interpretive services to facilitate communication between LEP tenants and Owners.

Note: Authority cited: Section 50199.17 and 50199.25, Health and Safety Code.
Reference: Sections 827 and 1947.12, Civil Code; Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21 and 50199.22, Health and Safety Code.

Section 10337. Compliance.

(a) Regulatory Agreement. All recipients of Tax Credits, whether Federal only, or both Federal and State, are required to execute a regulatory agreement, as a condition to the Committee's making an allocation, which will be recorded against the property for which the Tax Credits are allocated, and, if applicable, will reflect all scoring criteria proposed by the applicant in the competition for Federal and/or State housing Credit Ceiling.

(1) For all projects receiving a reservation of competitive 9% federal tax credits on or after January 1, 2016 for which all general partners will be Qualified Nonprofit Organizations, the partnership agreement shall include a Right of First Refusal ("ROFR") for one or more of the nonprofit general partners to purchase the project after the end of the 15-year federal compliance period. The price to purchase the project under this ROFR shall be the minimum price allowed under IRC Section 42(i) plus any amounts required to be paid to the tax credit investors that remain unpaid for approved Asset Management Fees and required payments under the limited partnership agreement for tax credit adjusters that remain outstanding at the time of the sale. The applicant shall demonstrate compliance with this requirement prior to the issuance of the 8609 forms.

(2) For all projects receiving a reservation of 4% and 9% federal tax credits on or after January 1, 2016, the regulatory agreement shall require written approval of the Executive Director for any Transfer Event.

(3) Where a Project is receiving renewable project-based rental assistance or operating subsidy:

(A) the owner shall in good faith apply for and accept all renewals available;

(B) if the project-based rental assistance or operating subsidy is terminated through no fault of the owner, the property owner shall notify CTCAC in writing immediately and shall make every effort to find alternative subsidies or financing structures that would maintain the deeper income targeting contained in the recorded CTCAC regulatory agreement. Upon documenting to CTCAC's satisfaction unsuccessful efforts to identify and obtain alternative resources, the owner may increase rents and income targeting for Low-Income Units above the levels allowed by the recorded regulatory agreement up to the federally-permitted maximum. Rents shall be raised only to the extent required for Financial Feasibility, as determined by CTCAC. Where possible, remedies shall include skewing rents higher on portions of the project in order to preserve affordability for units regulated by CTCAC at extremely low income targeting. Any necessary rent increases shall be phased in as gradually as possible, consistent with maintaining the project's Financial Feasibility. If housing Special Needs populations, the property owner shall attempt to minimize disruption to existing households, and transition to non-Special Needs households only as necessary and upon vacancy whenever possible.

(4) All projects that receive a reservation of Tax Credits on or after January 1, 2017 and that involve a leasehold interest shall, in addition to the regulatory agreement, execute a lease rider which shall be recorded in the County Recorder's Office for which the project is located.

(b) Responsibility of owner.

(1) Compliance. All compliance requirements monitored by the Committee shall be the responsibility of the project owner. Project owners are required to annually certify tenant incomes in conformance with IRS regulation §1.42-5(c)(3) unless the project is a 100 percent (100%) tax credit property exempted under IRC Section 142(d)(3)(A). Owners of a 100% tax credit property must perform a first annual income recertification in addition to the required initial move-in certification. After initial move-in certification and first annual recertification, owners of 100% tax credit properties may discontinue obtaining income verifications. Owners of 100% tax credit properties must continue to check for full-time student status of all households during the entire tenancy of the households and throughout the initial compliance period, and continue recordkeeping in accordance with paragraph (1) of this subsection. These requirements continue if the tax credit property is sold, transferred, or under new management. Any failure by the owner to respond to compliance reports and certification requirements will be considered an act of noncompliance and shall be reported to the IRS if reasonable attempts by the Committee to obtain the information are unsuccessful.

~~(2) Accessible Units: Reasonable Accommodations. All new and existing Tax Credit projects with fully accessible units for occupancy by persons with mobility impairments or hearing, vision or other sensory impairments shall provide a preference for those units as follows.~~

~~(A) First, to a current occupant of another unit of the same project having handicaps requiring the accessibility features of the vacant unit and occupying a unit not having such features, or if no such occupant exists, then~~

~~(B) Second, to an eligible qualified applicant on the waiting list having a handicap requiring the accessibility features of the vacant unit.~~

~~When offering an accessible unit to an applicant not having handicaps requiring the accessibility features of the unit, the owner or manager shall require the applicant to agree (and may incorporate this agreement in the lease) to move to a non-accessible unit when available.~~

~~Owners and managers shall adopt suitable means to assure that information regarding the availability of accessible units reaches eligible individuals with handicaps, and shall take reasonable nondiscriminatory steps to maximize the utilization of such units by eligible individuals whose disability requires the accessibility features of the particular unit.~~

(~~3~~2) Homeless youth and federal student rule. After the 15-year federal compliance period has lapsed, units in a special needs project designated at reservation for homeless youth may be occupied entirely by full-time students who are not dependents of another individual.

(~~4~~3) Prohibition against requiring tenants to participate in services. All new and existing Tax Credit projects are prohibited from requiring tenants to participate in services, unless the tenant occupies a unit assisted with a federal source that requires tenant participation in services.

(c) Compliance monitoring procedure. As required by Section 42(m), allocating agencies are to follow a compliance monitoring procedure to monitor all Credit projects for compliance with provisions of Section 42. Compliance with Section 42 is the sole responsibility of the owner of the building for which the Credit is allowable. The Committee's obligation to monitor projects for compliance with the requirements of Section 42 does not place liability on the Committee for any owner's noncompliance, nor does it relieve the owner of its responsibility to comply with Section 42. In addition to the requirements set forth in CTCAC's Compliance Manual, available on CTCAC's website (https://www.treasurer.ca.gov/ctcac/compliance/manual.asp) and incorporated herein by reference, owners must comply with the following:

(1) Record keeping. The owner of a Credit project is required to keep records for each qualified low income building in the project for each year in the compliance period showing: the total number of residential rental units in the building (including the number of bedrooms, and unit size in square feet); the percentage of Low-Income and Market Rate Units in the building that are Low-Income Units; the rent charged for each Low-Income Unit; a current utility allowance as specified in 26 CFR Section 142.10(c) and Section 10322(h)(21) of these regulations (for buildings using an energy consumption model utility allowance, that allowance must be calculated using the most recent version of the CUAC); the number of household members in each Low-Income Unit; notation of any vacant Low-Income Units; move-in dates for all Low-Income Units; low-income tenants' (i.e., household) income; documentation to support each low-income household's income certification; the eligible basis and qualified basis of the building at the end of the first year of the Credit period; and, the character and use of any nonresidential portion of the building included in the building's eligible basis.

Upon request, scattered site projects shall make these records available for inspection by CTCAC staff at a single location.

(2) Record Retention. For each qualified low-income building in the project, and for each year of the compliance period, owners and the Committee are required to retain records of the information described above in "record keeping requirements."

(A) Owners shall retain documents according to the following schedule:

(i) for at least six years following the due date (with extensions) for filing the Federal income tax return for that year (for each year except the first year of the Credit period); and,

(ii) for the first year of the Credit period, at least six years following the due date (with extensions) for filing the Federal income tax return for the last year of the compliance period of the building.

(iii) for local health, safety, or building code violation reports or notices issued by a state or local governmental entity, until the Committee has inspected the reports or notices and completes the tenant file and unit inspections, and the violation has been corrected. This subsection shall take effect beginning January 1, 2001.

(B) The Committee shall retain records of noncompliance, or failure to certify, for at least six years beyond the Committee's filing of the respective IRS noncompliance Form 8823. Should the Committee require submission of copies of tenant certifications and records, it shall retain them for three years from the end of the calendar year it receives them. Should it instead review tenant files at the management office of the subject project, it shall retain its review notes and any other pertinent information for the same three-year period. The Committee shall retain all other project documentation for the same three-year period.

(3) Certification requirements. Under penalty of perjury, a Credit project owner is required to annually, during each year of the compliance period, meet the certification requirements of U.S. Treasury Regulations 26 CFR 1.42-5(c), (including certifications that no finding of discrimination under the Fair Housing Act, 42 USC 3601 occurred for the project), that the

buildings and low income units in the project were suitable for occupancy taking into account local health, safety, and building codes, that no violation reports were issued for any building or low income unit in the property by the responsible state or local government unit, that the owner did not refuse to lease a unit to an applicant because the applicant had a section 8 voucher or certificate, and that except for transitional or single room occupancy housing, all low income units in the project were used on a nontransient basis. The following must also be certified to by the owner:

(A) the project met all terms and conditions recorded in its Regulatory Agreement, if applicable;

(B) the applicable fraction (as defined in IRC Section 42(c)(1)(B)) met all requirements of the Credit allocation as specified on IRS Form(s) 8609 (Low-Income Housing Credit Allocation Certification.);

(C) no change in ownership of the project has occurred during the reporting period;

(D) the project has not been notified by the IRS that it is no longer a "qualified low-income housing project" within the meaning of Section 42 of the IRC;

(E) no additional tax-exempt bond funds or other Federal grants or loans with interest rates below the applicable Federal rate have been used in the Project since it was placed-in-service; and,

(F) report the number of units that were occupied by Credit eligible households during the reporting period.

(G) the services specified in the Regulatory Agreement were provided to the tenants during the reporting period.

(H) if the project is subject to a cash flow limitation in its Regulatory Agreement, that the limitation has been met.

(I) the project complied with local, state, and federal laws, constitutions, codes, standards, rules, guidelines, and regulations, including, without limitation, those that pertain to accessibility, construction, health and safety, labor, fair housing, fair employment practices, affirmatively furthering fair housing, nondiscrimination, and equal opportunity and is not the subject of any regulatory or investigative proceeding by a local, state, or federal agency relating to an alleged, pending, ongoing, or closed violation of the Fair Housing Laws.

(4) Status report, file and on site physical inspection. The Committee or its agent will conduct file and on site physical inspections for all projects no later than the end of the second calendar year following the year the last building in the project is placed-in-service, and once every three years thereafter. These physical inspections will be conducted for all buildings and common areas in each project, and for at least 20% of the low-income units in each project. The tenant file reviews will also be for at least 20% of the low-income units in each project, but may be conducted on site or off site. Each year the Committee shall select projects for which site inspections will be conducted. The projects shall be selected using guidelines established by the Executive Director for such purpose, while the units and tenant records to be inspected shall be randomly selected. Advance notice shall not be given of the Committee's selection process, or of which tenant records will be inspected at selected projects; however, an owner shall be given reasonable notice prior to a project inspection.

(A) A Notice of Intent to Conduct Compliance Inspection and a Project Status Report (PSR) form will be delivered to the project owner within a reasonable period before an inspection is scheduled to occur. The completed PSR form shall be submitted to the Committee by the owner prior to the compliance inspection. The Committee will review the information submitted on the PSR for compliance with income, rent and other requirements prior to performing the tenant file inspection.

(B) Each project undergoing a file inspection will be subject to a physical inspection to assure compliance with local health, safety, and building codes or with HUD's uniform physical condition standards. Owners shall be notified of the inspection results.

(C) The Committee may perform its status report, file inspection procedures and physical inspection on Credit projects even if other governmental agencies also monitor those projects. The Committee's reliance on other review findings may alter the extent of the review, solely at the Committee's discretion and as allowed by IRS regulations. The Committee may rely on reports of site visits prepared by lenders or other governmental agencies, at its sole discretion. The Committee shall, whenever possible, coordinate its procedures with those of other agencies, lenders and investors.

(5) Notification of noncompliance. The Committee shall notify owners in writing if the owner is required to submit documents/information related to either the physical or tenant file inspection. If the Committee does not receive the information requested, is not permitted or otherwise is unable to conduct the inspections or discovers noncompliance with Section 42 as a result of its review, the owner shall be notified in writing before any notice is sent to the IRS.

(6) Correction period. It is the intention of the Committee that owners be given every reasonable opportunity to correct any noncompliance. Owners shall be allowed an opportunity to supply missing tenant file documents or to correct other noncompliance within a correction period no longer than ninety (90) days from the date of written notice by the Committee to the owner, unless the violation constitutes an immediate health or safety issue, in which case, the correction should be made immediately. With good cause, the Committee may grant up to a six-month extension of the correction period upon receipt of a written justification from the owner.

(7) IRS and FTB notification. All instances of noncompliance, whether corrected or not, shall be reported by the Committee to the IRS. This shall be done within forty-five (45) days following the termination of a correction period allowed by the Committee, pertaining to IRS Form 8823.

(d) Change in ownership and property management. It is the project owner's responsibility to comply with the requirements of Section 10320(b) and to inform the Committee of any change in the project owner's mailing address.

(1) Any property management change during the 15-year federal compliance and extended use period must be to a party earning equal capacity points pursuant to Section 10325(c)(1)(A) as the exiting property management company. At a minimum this must be six (6) projects in service more than three years, or the demonstrated training required under Section 10326(g)(5). Two of the six projects must be Low Income Housing Tax Credit projects in California. If the new property management company does not meet these experience requirements, then substitution of property management shall not be permitted.

(e) First year's 8609. Project owners shall be required to submit a copy of the executed first year's filing of IRS Form 8609 (Low-Income Housing Credit Allocation Certification) for inclusion in the Committee's permanent project records.

(f) (1) CTCAC may establish a schedule of fines for violations of the terms and conditions, the regulatory agreement, other agreements, or program regulations. In developing the schedule of fines, CTCAC shall establish the fines for violations in an amount up to five hundred dollars ($500) per violation or double the amount of the financial gain because of the violation, whichever is greater. Except for serious violations, a first-time property owner violator shall be given at least 30 days to correct the violation before a fine is imposed. A violation that has occurred for some time prior to discovery is one violation, but fines may be a recurring amount if the violation is not corrected within a reasonable period of time thereafter, as determined by the Committee.

(2) CTCAC shall adopt and may revise the schedule of fines by resolution at a public general Committee meeting.

(3) A person or entity subject to a fine may appeal the fine to the Executive Director and, thereafter, to the Committee pursuant to Section 10330(b)(2).

(4) The Executive Director may approve a payment plan for any fines.

(5) If a fine assessed against a property owner is not paid within six months from the date when the fine was initially assessed and after reasonable notice has been provided to the property owner, the Committee may record a lien against the property. If the violation(s) for which the fine(s) is assessed is not corrected within 90 days of the assessed fine, the Committee may record a lien against the property.

(6) Reoccurring or repeated noncompliance – CTCAC shall issue fines of up to $500 per instance of repeated or reoccurring noncompliance violations noted in separate monitoring cycles. CTCAC defines repeated or reoccurring violations as 25% or more instances of the current monitoring inspection having the same noncompliance issues as found in the previous monitoring cycle.

Areas of repeated or reoccurring noncompliance include (but are not limited to):

(A) Repeated Uniform Physical Conditions Standards (UPCS) Health and Safety Violations and Common Area Violations
(B) Reoccurring patterns of units no turn-key ready and advertised within 60 days of unit vacancy date
(C) Reoccurring patterns of missing or the incorrect use of required CTCAC forms
(D) Reoccurring misuse of Utility Allowance methods
(E) Reoccurring patterns of over-income households
(F) Reoccurring patterns of over-charged rents
(G) Reoccurring patterns of incomplete or missing re-certifications
(H) Service Amenities not provided within Federal Compliance periods

(g) Housing Supplier Diversity Reporting. A housing sponsor that receives a tax credit reservation on or after January 1, 2024, shall annually submit a report to CTCAC, in a form that CTCAC shall require, and at the time that CTCAC shall annually designate. The reporting period shall cover all contract activities directly related to the development and construction of a housing project from the first day following the credit reservation date with an option for the housing sponsor to include prior contracting activities. The final report shall cover the year that the project is placed in service. The report shall include information, as required in Section 50199.23 of the Health and Safety Code and as outlined in the CTCAC Housing Supplier Diversity Reporting Guidelines: Completing the Housing Supplier Diversity Annual Report.

Note: Authority cited: Section 50199.17, Health and Safety Code.
Reference: Sections 12206, 17058 and 23610.5, Revenue and Taxation Code; and Sections 50199.4, 50199.5, 50199.6, 50199.7, 50199.8, 50199.9, 50199.10, 50199.11, 50199.12, 50199.13, 50199.14, 50199.15, 50199.16, 50199.17, 50199.18, 50199.20, 50199.21, 50199.22 and 50199.23 Health and Safety Code.

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE

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Director of HCD

TIENA JOHNSON HALL
Executive Director of CalHFA

EXECUTIVE DIRECTOR
MARINA WIANT

DRAFT

DATE: [Date]

TO: CTCAC Stakeholders

FROM: Marina Wiant, Executive Director

RE: Rent Increase Limit Waiver Memorandum

Effective January 1, 2025, the California Tax Credit Allocation Committee (CTCAC) is implementing a rent increase limit ("rent cap") on all low-income housing tax credit projects with a CTCAC regulatory agreement.[1] The purpose of this memorandum is to provide guidance on the process for requesting the Executive Director waive the rent cap, information required as part of the waiver, and the standard for evaluating a waiver.

Rent Increase Limit Standard

Under the rent cap, owners may increase gross rent for a low-income household provided that in any 12-month period the increase does not exceed the lesser of five (5) percent plus the percentage increase in the cost of living[2] or ten (10) percent of the lowest rental rate charged for that household at any time during the 12 months prior to the effective date of the increase.[3]

Owners may exceed the rent cap limit without a waiver to increase the gross rent up to 30 percent of the monthly income of the household occupying the unit; for projects with terminated project-based rental assistance or operating subsidy as described in CTCAC Regulation Section 10337(a)(3)(B); or for a transfer of a household to another unit in the same property that has a different bedroom count or transfer to a higher AMI

[1] Prior to December 31, 2024, the rent increase limit applied prospectively, starting April 3, 2024, to new tax credit reservations and transfer events. (See CTCAC Regulations 10328(a), 10320(b) (April 3, 2024).)
[2] As defined in paragraph (3) of subdivision (g) of Section 1947.12 of the Civil Code
[3] CTCAC Regulation Section [Proposed]

designation, as required by a public regulatory agreement or deed restriction, due to a change in the household's income or occupancy from initial qualification. Exceeding the rent cap under any other circumstance requires a waiver from the Executive Director.

Rent Increase Limit Waiver

Upon request, the Executive Director may waive the rent cap limit if the project owner shows that the proposed increase is necessary to ensure the financial stability or fiscal integrity of the project and does not unreasonably impact existing residents.

Financial stability considers the project's overall financial health, with a focus on how historical financial decision making impacted the project's current fiscal integrity and how projected needs may impact the project's future fiscal integrity. Fiscal integrity is an objective evaluation of whether the project's total operating income plus funds released from the operating reserve consistent with project documents are sufficient to pay all current operating expenses, pay all current debt service (excluding deferred interest), fully fund all reserve accounts (other than the operating reserve account), and pay other costs permitted by the CTCAC Regulatory Agreement, without regard for the ability to pay any permitted annual distributions.

The impact on existing residents involves a review of vacancy rate information and rent burden analysis, with an understanding that households are rent burdened if they spend 30% or more of household income on housing costs and severely rent burdened if they spend more than 50%. The Executive Director may consider any other factors relevant to the waiver request in making a waiver determination. Under no circumstance shall the Executive Director approve a waiver exceeding the maximum allowable programmatic rents.

The following documentation is required to be submitted with all waiver requests:

1. Rent increase waiver justification narrative discussing the project's financial stability, a specific presentation of the project's current fiscal integrity and, if relevant, how it may be compromised in the future, and the proposed rent increase impact on tenants.
2. A complete rental increase request and rent burden worksheet.
3. Current utility allowance documentation, including calculations.
4. 12-month occupancy report with unit level vacancy information.
5. Most recent financial statements (income statement and balance sheet), and any relevant historic financial statements or financial projections.
6. Current rent rolls.
7. Detailed information on capital needs, which may include:
    a. Third-party reports documenting the property needs and estimated timing of repair/replacement.
    b. Capital needs assessment, when available.
    c. Updated replacement schedule clearly assessing property needs, including estimated replacement costs and estimated remaining life.

DRAFT

8. Other information supporting the waiver, such as habitability issues, increased staffing costs, increased insurance premiums, damage from natural disasters, etc.

The Executive Director's waiver evaluation will include, but is not limited to, the following to determine the need for the requested rent limit increase:

1. The project's fiscal integrity and past, current, and future financial stability.
2. Review of current rents and utility allowances, subsidy information and household income.
3. A comparison of the request to the maximum allowable programmatic rent.
4. A review of the property's vacancy rate history and extended unit vacancies.
5. Consideration of a property's needs, including capital repairs, maintenance, services, and staffing.
6. An analysis of reasonableness to area market comparable rents.
7. An assessment of project resources, including replacement reserve.
8. A review of outstanding compliance issues, including unapproved rent increases, unresolved habitability issues, and unresponsiveness to CTCAC reporting requirements.
9. An analysis of the number of tenants cost burdened or severely cost burdened by the increase.
10. A replacement reserve analysis.

The following standards may be relied on by the Executive Director in granting a requested waiver:

1. Analysis of cash flow trends; cash flow before obligations.
2. A clear narrative explanation and sufficient documentation supporting the request for additional resources.
3. Limited impact to existing residents, including an evaluation the percent of residents that are considered rent burdened (over 30% of income towards housing costs).
4. Clear demonstration of capital needs and clear explanation how additional rental income will be used to fund capital needs.
5. Projects that have maintained an occupancy rate of 97% or higher for over 12 months or projects that can clearly articulate why a rental increase will have limited impact on vacancy rates.

To start the waiver request process, please contact [Insert Staff Contact]. Staff will respond within 10 working days to provide the CTCAC worksheets. CTCAC must receive the completed worksheets and all supporting waiver documentation within 30 business days. Once received by CTCAC, the Executive Director will issue a decision within 30 business days, unless additional information is requested, at which point the Executive Director will notify the requestor of the additional information needed and any timeline extensions.

DRAFT

Unapproved Rent Increases in Excess of the Allowable Limit

If CTCAC determines a project impermissibly increases rents above allowable limits, it may, at its sole discretion, require the owner to refund the excess rent collected by the project to the tenants. Proof of rent credit or refund will be required. CTCAC may also impose negative points and fines consistent with Regulation Sections 10325(c)(2) and 10337(f).

DRAFT

AGENDA ITEM 6

Resolution No. 24/25-03 to adopt the CTCAC/HCD Opportunity Area Map for Calendar Year 2025. (Cal. Code Regs., tit. 4 § 10302.)

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
RESOLUTION NO. 24/25-03
December 11, 2024

RESOLUTION TO ADOPT A CTCAC/HCD OPPORTUNITY AREA MAP FOR CALENDAR YEAR 2025

WHEREAS, the California Tax Credit Allocation Committee ("CTCAC") is responsible for administering the Federal and State Low Income Housing Tax Credit programs in California (Health & Saf. Code, § 50199.4 et seq.); and

WHEREAS, California Code of Regulations, title 4, sections (Regulation) 10325(c)(4)(A)(11), 10325(c)(9)(C) and 10327(c)(5)(F) provide site amenity points, a tiebreaker bonus and a threshold basis limit increase for qualified projects designated on the CTCAC/HCD Opportunity Area Map as Highest or High Resource; and

WHEREAS, Regulation 10302 states CTCAC annually approves the CTCAC/HCD Opportunity Area Map.

NOW, THEREFORE, BE IT RESOLVED by the California Tax Credit Allocation Committee as follows:

SECTION 1. The CTCAC/HCD Opportunity Area Map for calendar year 2025 as shown in Exhibit A to this resolution is approved.

SECTION 2. This resolution shall take effect immediately upon its adoption.

Attest: ________________________
Chair

Date of Adoption: December 11, 2024

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE

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JOE STEPHENSHAW
Director of Finance

GUSTAVO VELASQUEZ
Director of HCD

TIENA JOHNSON HALL
Executive Director of CalHFA

EXECUTIVE DIRECTOR
MARINA WIANT

DATE: December 4, 2024

TO: California Tax Credit Allocation Committee ("CTCAC") and California Department of Housing and Community Development ("HCD") Stakeholders

FROM: Anthony Zeto, Deputy Director (CTCAC) and Megan Kirkeby, Deputy Director of Housing Policy Development (HCD)

RE: Response to Comments on the Draft 2025 CTCAC/HCD Opportunity Map

CTCAC, HCD, and the California Debt Limit Allocation Committee ("CDLAC") use the CTCAC/HCD Opportunity Map ("Map") to inform policies aimed at increasing access to opportunity-rich areas for residents of affordable housing financed with Low Income Housing Tax Credits and other state funding programs. We have adopted this approach in light of overall patterns of residential segregation and unequal access to opportunity, and, specifically, historical concentrations of this housing in areas characterized by limited resources, high poverty rates, and racial concentration. The Map is an essential tool for advancing the affirmatively furthering fair housing ("AFFH") objective of increasing access to opportunity in State policies and programs. CTCAC and HCD work with its researchers tasked on updating the Map each year based on newly available data, research and public comments.[1]

CTCAC and HCD published the draft 2025 Map on October 30, 2024 and accepted public comments through November 20, 2024. As described in the memo accompanying the draft 2025 Map release, the focus of this year's update process was reducing instability in annual updates.[2] Exploration into potential sources of instability,

[1] Research partners currently include representation from Othering & Belonging Institute at UC Berkeley, the Terner Center for Housing Innovation at UC Berkeley, and the California Housing Partnership.

[2] Some amount of change in indicator scores and map categorization is expected in updates due to incorporation of more recent data which represent real changes on the ground, and the new threshold-based methodology did not

and approaches for addressing them, yielded one proposed methodology change for the draft 2025 Map: implementing a three-year rolling average for education indicators, which include student poverty, reading proficiency, math proficiency, and high school graduation rate.

CTCAC and HCD appreciate the feedback provided through comment letters on the draft 2025 Map. After reviewing and considering these comments in consultation with research partners, CTCAC and HCD will proceed to adopt the map initially released for public comment. We also offer the responses below to specific issues raised in the comment letters (which are included as an attachment). The comment letters submitted are referenced in responses according to the following numerical identification.

Number	Commenter(s)
1	Ann Silverberg, Related California Northern California & Northwest Affordable Divisions
2	Capri Juliet Roth, East Bay Asian Local Development Corporation
3	Community-Based Development Collaborative (Regina Celestin Williams, SV@Home; Malcolm Yeung, Chinatown Community Development Center; Erich Nakano, Little Tokyo Service Center; Arnulfo Manriquez, Metropolitan Area Advisory Committee on Anti-Poverty; Alejandro Martinez, Coalition for Responsible Community Development; Duane Bay, East Palo Alto Community Alliance and Neighborhood Development Organization; Omar Carrera, Canal Alliance; Janelle Chan, East Bay Asian Local Development Corporation; Aubra Levine, The Unity Council; Luis Granados, Mission Economic Development Agency; Katie Lamont, Tenderloin Neighborhood Development Corporation)
4	Robin Zimbler, Freebird Development Company

Use of regional benchmarks (1, 2, 3)

Multiple comments related to the Map's use of regional benchmarks in scoring and classifying neighborhoods, and argued that statewide benchmarks should be used in addition to regional benchmarks. We received similar comments on the draft 2024 Map and our response this year is the same as last year: although we understand that use of regional benchmarks continues to be a concern for developers and advocates in some parts of the state, we will continue to use this approach for a set of interrelated policy and methodological reasons.

introduce any new structural sources of instability. In addition, "grandfathering" clauses in housing funding program regulations and guidelines have helped applicants adjust to map updates over time. However, "noise" in data used in the Map that does not represent real or lasting change – whether due to data reporting error, sampling error, or other sources – present a potential source of instability that should be minimized to the degree practicable. Map instability is thus still an area of general concern, particularly in rural areas where Map categorization shifts year-to-year with greater frequency than in urban and suburban areas.

First, use of regional benchmarks is aligned with HCD and CTCAC's goal to advance the AFFH objective of increasing access to opportunity in each region of the state, reflecting likely residential mobility patterns for low-income families in regional employment and housing markets. This approach also aligns with the competitive architecture of State affordable housing programs, where much of the competition for funding occurs within regions.

A mapping approach that uses statewide benchmarks would not align with the goal of advancing AFFH objectives in each region because California's immense size and range of economic and environmental contexts would lead to a highly uneven map which makes illogical comparisons between rural, inland, and coastal areas. Further, a hybrid approach – as proposed in the comment letters[3] – where neighborhoods are scored relative to whichever is more favorable between regional or statewide benchmarks, would effectively lower standards for what is classified as high resource in some regions, weakening incentives to build affordable housing in regionally defined high resource areas and thereby decreasing the level of opportunity to which families living in affordable housing have access.[4]

In addition, not all indicators included in the Map methodology are well suited to statewide comparison. The primary example is home values, which are regionally generated based on local housing and job market dynamics. Internal analysis found that the home value indicator would drive a meaningful amount of shift in classification of neighborhoods under a statewide or hybrid benchmarking approach – meaning neighborhoods could be classified as high resource under a statewide approach solely because of higher home values – contributing to our belief that such an approach would not be appropriate. We appreciate the comments on this topic and are always open to further discussions on how to improve the mapping methodology in a way that advances the State's policy goals.

Changing mapping categories (4)

As noted above, the focus of the update process for the draft 2025 Map was reducing instability in annual updates, which lead to the proposed approach of using a three-year rolling average of the education indicators – reading and math proficiency, high school graduation rates, and student poverty – instead of a single year of data. The three-year rolling average allows real changes to emerge in map updates over time while limiting the effect of noisy data (year to year variability in the data that does not necessarily

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[3] Please note that these comment letters, which are included as an attachment to this memo, include images from an outdated version of the Map created for discussion purposes two years ago. These images do not accurately represent the hybrid scenario proposed in these letters.

[4] A related point is that the majority of new construction large-family developments awarded Low Income Housing Tax Credit awards since introduction of opportunity area incentives are in Low Resource and Moderate Resource areas. According to analysis conducted in 2022, this pattern is particularly pronounced in the San Francisco Bay Area region – the region that would be most affected by the hybrid approach proposed in comment letters – suggesting that more progress is needed in increasing access to the region's higher resource neighborhoods, not less.

reflect real changes), while increasing year-to-year stability in indicator measurements and categorization in the Map.

One comment raised the possibility of also adopting a rolling average approach for economic indicators, noting that sample size limitations in American Community Survey (ACS)-derived economic indicators, particularly in rural areas, also contributes higher margins of error and greater year to-year instability. While this observation is true, ACS 5-year estimates, which are the sole data source for the Map's economic indicators, already compile samples over multiple years to construct the estimates. Furthermore, the research partners identify and suppress unreliable data points when sample size limitations affect data quality.

However, we recognize that economic indicators are still a source of instability, particularly in rural areas. In fact, in this year's update process, the research partners explored the approach of controlling for statistically significant change in economic indicators. However, multiple methodological and legibility-related challenges emerged with this approach. As a result, controlling for statistical significance was set aside as a topic requiring further exploration. However, we may continue to explore approaches to reducing instability in economic indicators in future Map udpates.

It should also be noted that agencies have sought to address the instability issue through a grandfathering clause in housing funding programs, allowing applicants to claim the mapping category either at the time of application or at the time of site control up to seven years prior. CTCAC, HCD, and CDLAC do not anticipate removing this clause in future updates to funding program regulations and guidelines.

RELATED

November 20, 2024

Anthony Zeto, Deputy Director
California Tax Credit Allocation Committee
901 P Street, Suite 213A
Sacramento, CA 95814

Megan Kirkeby, Deputy Director Housing Policy Department
California Department of Housing and Community Development
651 Bannon Street
Sacramento, CA 95811

Submitted via email to Anthony.Zeto@treasurer.ca.gov and Megan.Kirkeby@hcd.ca.gov

RE: 2025 Opportunity Map

Dear Mr. Zeto & Ms. Kirkeby,

Related California appreciates the opportunity to provide comments on the "Proposed 2025 CTCAC/HCD Opportunity Map."

Related California is one of California's most prolific developers of affordable and mixed-income housing. Our work spans throughout the State of California and reflects our over 30-year commitment to create high-quality affordable housing to address California's housing crisis.

We are writing to echo East Bay Asian Local Development Corporation's concern about the mapping methodology and believe that their proposed analysis and solution below deserves your consideration.

Problem Statement: The current version of the Opportunity Map, in order to balance investment throughout the state, labels some areas as Low or Moderate Resource that are actually High Resource Areas according to the raw opportunity data (economic, education, and environmental indicators). This disproportionately affects urban communities of color, which are – as a result – being denied critical housing funding on the false basis that they are not good areas to raise children, when in fact they are excellent places to raise children according to the State's own data.

Solution: HCD staff briefly released the raw opportunity data showing what the maps could look like if they identified High/Moderate/Low Resource Areas statewide, without the requirement to have an equal number of High Resource Areas in each region. See Attachment 1 for snapshot comparisons of these statewide maps to the current adopted maps in key urban areas.

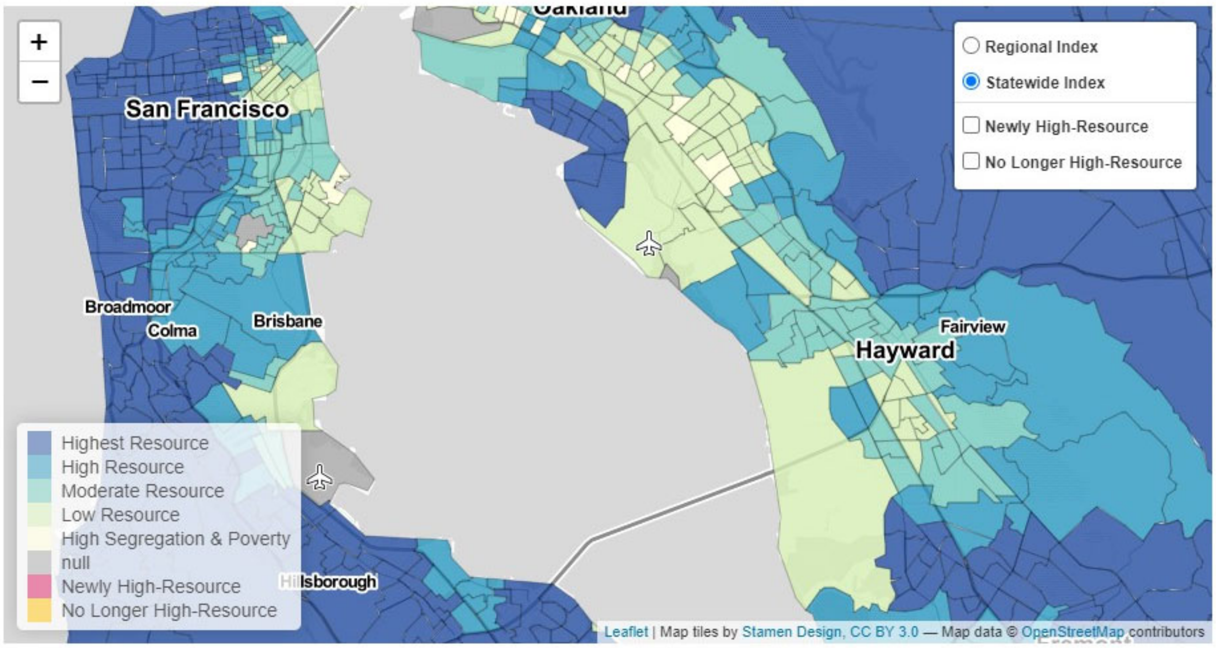
As EBALDC suggests, a simple solution to the above problem could be to adopt the statewide map of High/Highest Resource Areas based on the un-adjusted data, and then apply the regionally-adjusted map as an *additive* layer, increasing the number of High/Highest Resource Areas to reflect the census tracts that, while not in the top 20% or 40% of census tracts statewide, do represent the highest resource census tracts in their respective regions; the resulting map would not remove the High Resource designation from any areas that currently receive it because of the regional requirement, but would better capture the range of excellent locations where affordable housing can be incentivized. This would maintain the geographic diversity TCAC wants to see in the maps without misrepresenting urban communities as Low or Moderate Resource that in fact are High Resource according to the opportunity data.

Sincerely,

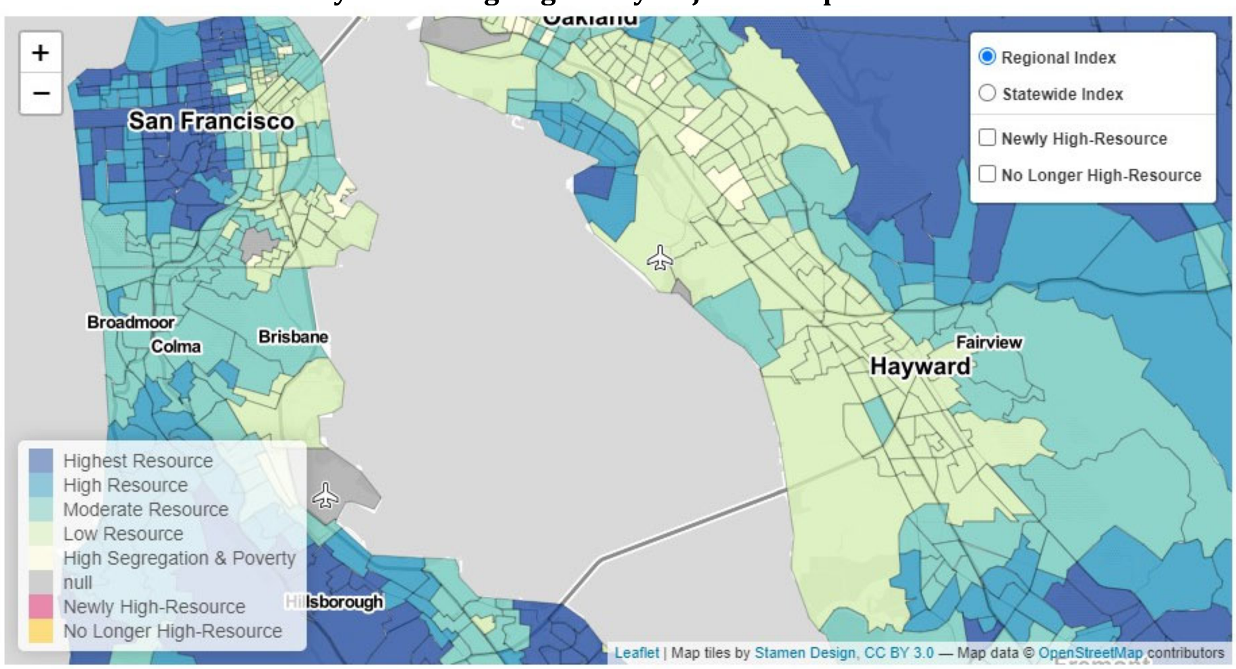
Ann Silverberg
Chief Executive Officer
Related California Northern California & Northwest Affordable Divisions

ATTACHMENT 1: COMPARITIVE MAPS: STATEWIDE AND REGIONALLY ADJUSTED

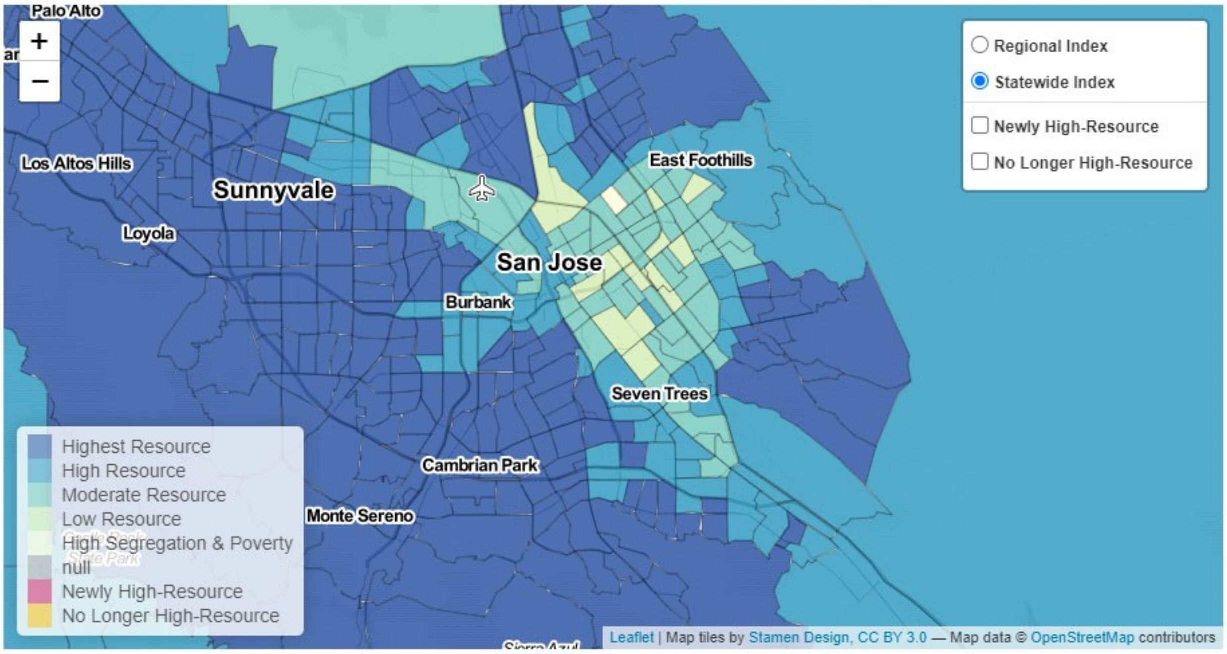
San Francisco and East Bay Area using Statewide Map:



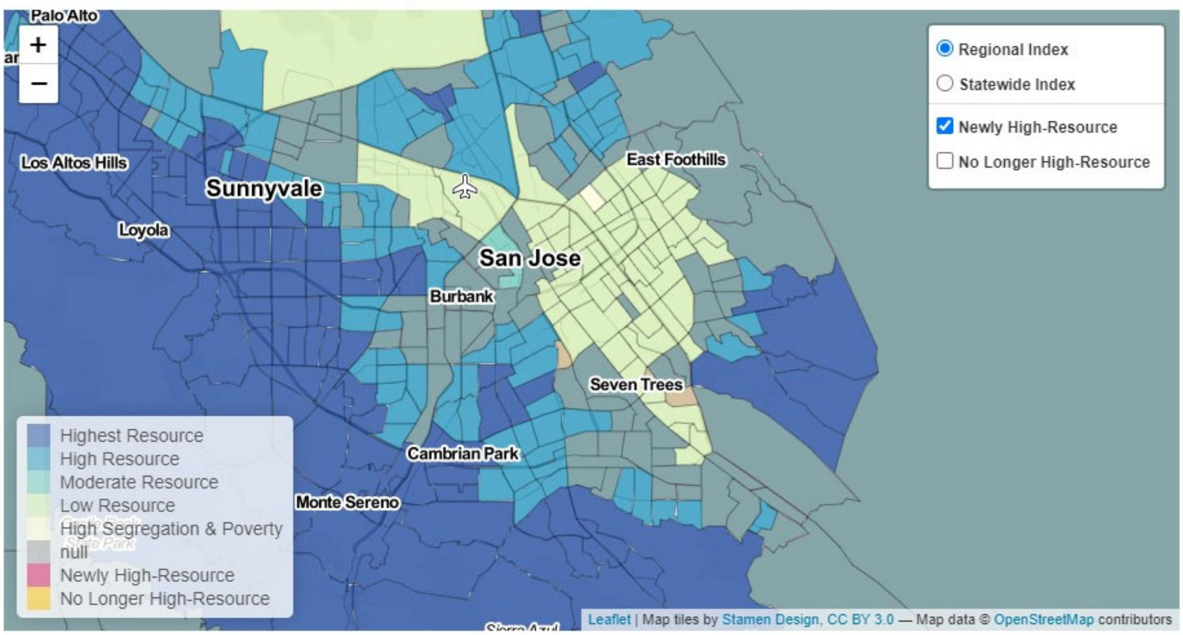
San Francisco and East Bay Area using Regionally Adjusted Map:



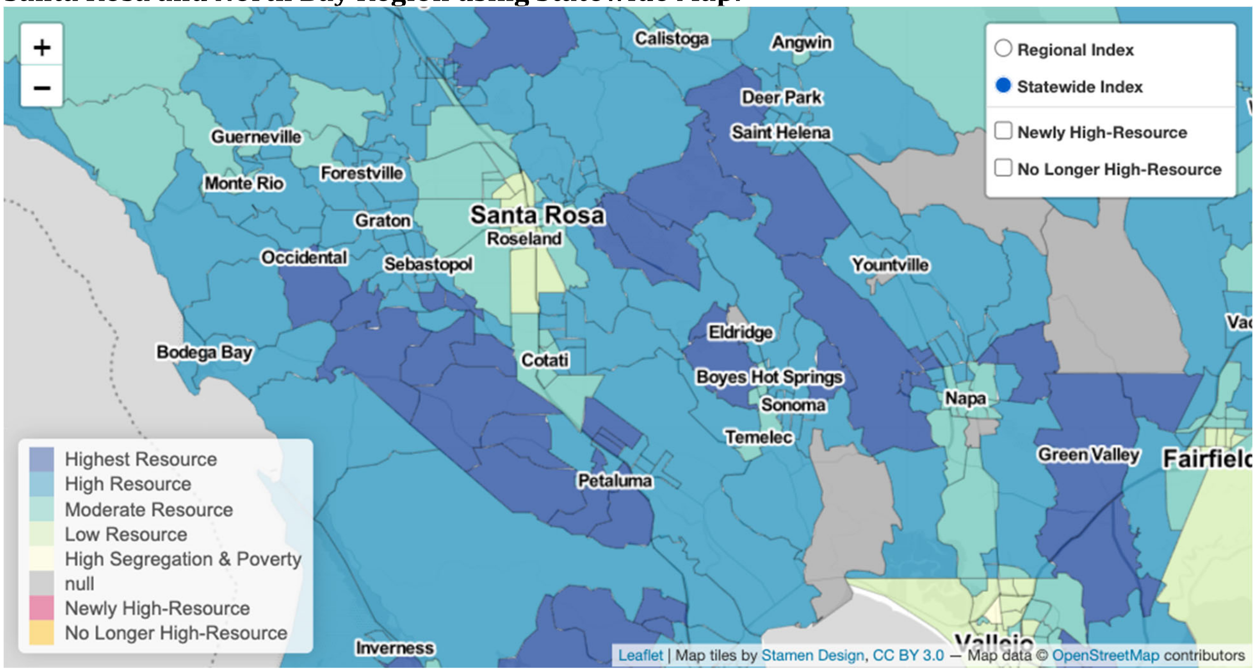
San Jose and Silicon Valley using Statewide Map:



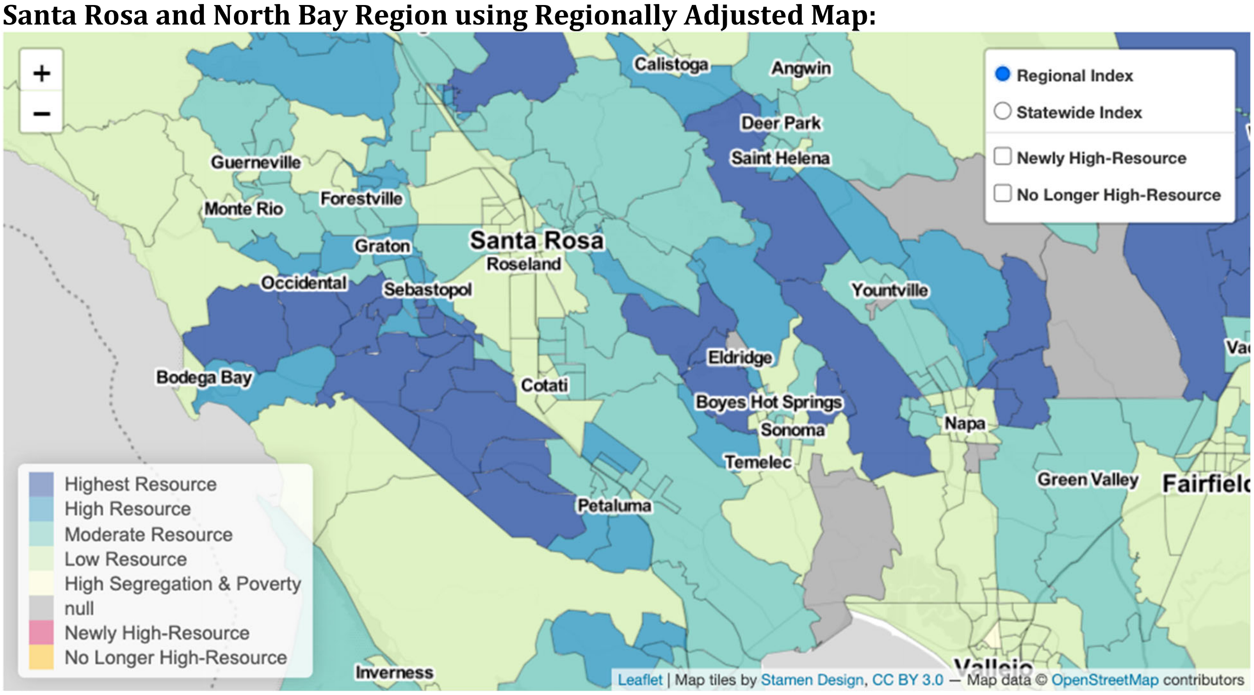
San Jose and Silicon Valley using Regionally Adjusted Map:



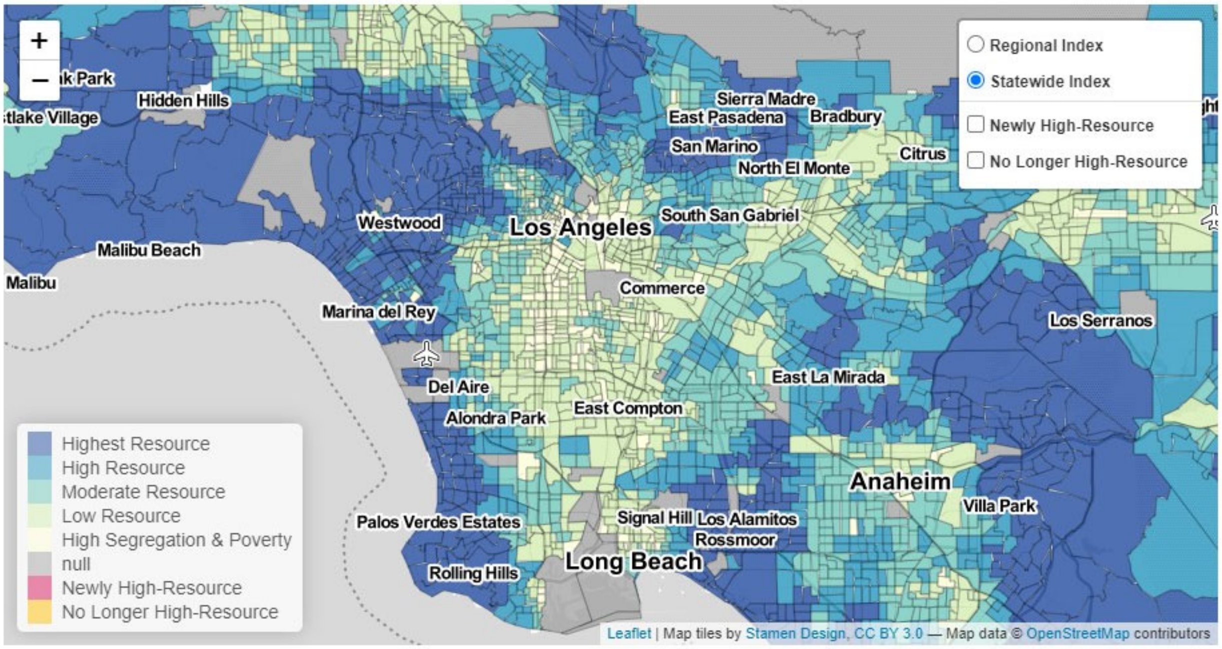
Santa Rosa and North Bay Region using Statewide Map:



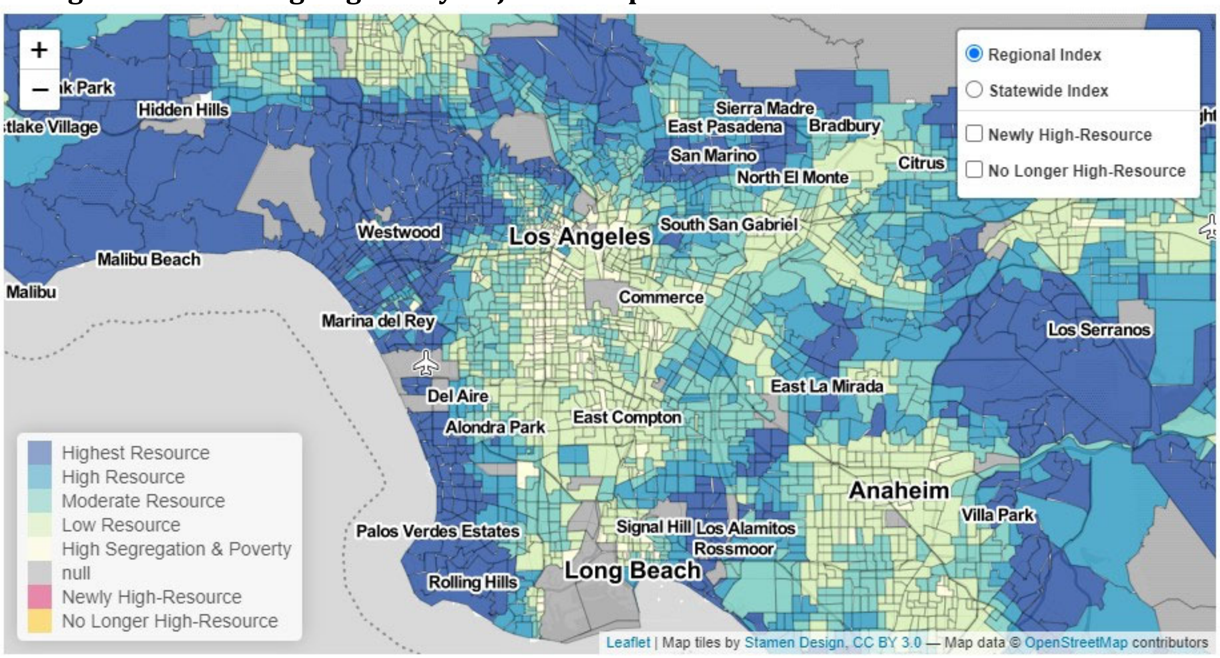
Santa Rosa and North Bay Region using Regionally Adjusted Map:



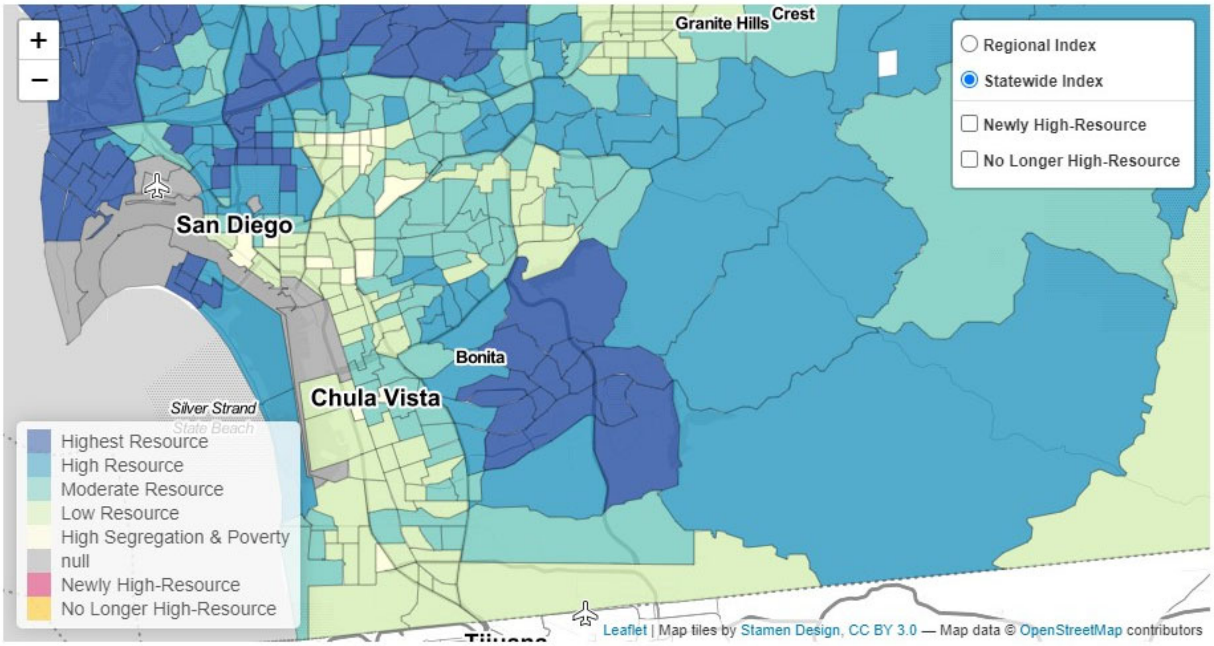
Los Angeles Metro using Statewide Map:



Los Angeles Metro using Regionally Adjusted Map:



San Diego Area using Statewide Map:



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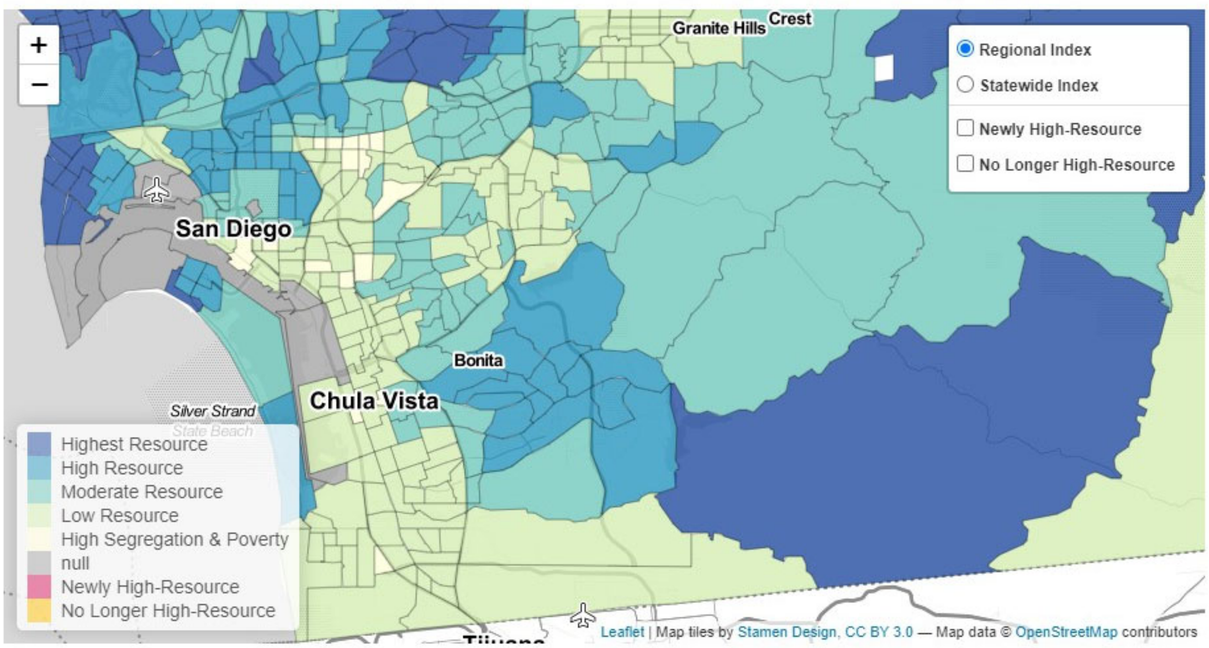

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November 20, 2024

Anthony Zeto, Deputy Director
California Tax Credit Allocation Committee
901 P Street, Suite 213A
Sacramento, CA 95814

Megan Kirkeby, Deputy Director Housing Policy Department
California Department of Housing and Community Development
651 Bannon Street
Sacramento, CA 95811

Submitted via email to Anthony.Zeto@treasurer.ca.gov and Megan.Kirkeby@hcd.ca.gov

RE: 2025 Opportunity Map

Dear Mr. Zeto & Ms. Kirkeby,

East Bay Asian Local Development Corporation (EBALDC) appreciates the opportunity to provide these comments on the "Proposed 2025 CTCAC/HCD Opportunity Map." We appreciate the numerous engagements that HCD, especially, has offered to discuss AFFH in the state of California, including the numerous conversations with the California Community Based Development Collective (CBDC), of which EBALDC is a participant. We appreciate the continued efforts to improve both the mapping methodologies and the overall framework for affirmatively furthering fair housing. We continue to offer our comments in the spirit of that improvement and refinement of the maps, while recognizing their limitations for fully realizing the goals of the AFFH mandate. For that reason, we strongly encourage CTCAC and HCD to continue robust engagement and efforts to develop a framework for driving investment into communities that have been harmed by the systemic disinvestment related to historic and current racism and redlining.

EBALDC is a non-profit community development organization with over 49 years of experience in building healthy, vibrant and safe neighborhoods in Oakland and East Bay. We address the specific needs of individual neighborhoods by connecting the essential elements of health and wellbeing through our Healthy Neighborhoods Approach. Emphasizing our historic and continuing commitment to Asian and Pacific Islander communities, EBALDC works with and for all the diverse populations of the East Bay to build healthy, vibrant and safe neighborhoods through community development. We achieve more by building strong partnerships to accomplish neighborhood goals.

In response to the Draft 2025 Opportunity Maps, we strongly urge the state to correct a glaring and persistent shortfall, which is the down-labeling of census tracts as "moderate" or "low" resource neighborhoods, when the data itself demonstrates that this is not an accurate characterization of these communities.

Problem Statement: The current version of the Opportunity Map, in order to balance investment throughout the state, labels some areas as Low or Moderate Resource that are actually High Resource Areas according to the raw opportunity data (economic, education, and environmental indicators). This disproportionately affects urban communities of color, which are – as a result – being denied critical housing funding on the false basis that they are not good areas to raise children, when in fact they are excellent places to raise children according to the State's own data.

Docusign Envelope ID: E990797C-D245-4244-9DF3-CC60960E5826

Solution: HCD staff briefly released the raw opportunity data showing what the maps would look like if they identified High/Moderate/Low Resource Areas statewide, without the requirement to have an equal number of High Resource Areas in each region. See Attachment 1 for snapshot comparisons of these statewide maps to the current adopted maps in key urban areas.

A simple solution to the above problem would be to adopt the statewide map of High/Highest Resource Areas based on the un-adjusted data, and then apply the regionally-adjusted map as an *additive* layer, increasing the number of High/Highest Resource Areas to reflect the census tracts that, while not in the top 20% or 40% of census tracts statewide, do represent the highest resource census tracts in their respective regions; the resulting map would not remove the High Resource designation from any areas that currently receive it because of the regional requirement, but would better capture the range of excellent locations where affordable housing can be incentivized. This would maintain the geographic diversity TCAC wants to see in the maps without misrepresenting urban communities as Low or Moderate Resource that in fact are High Resource according to the opportunity data.

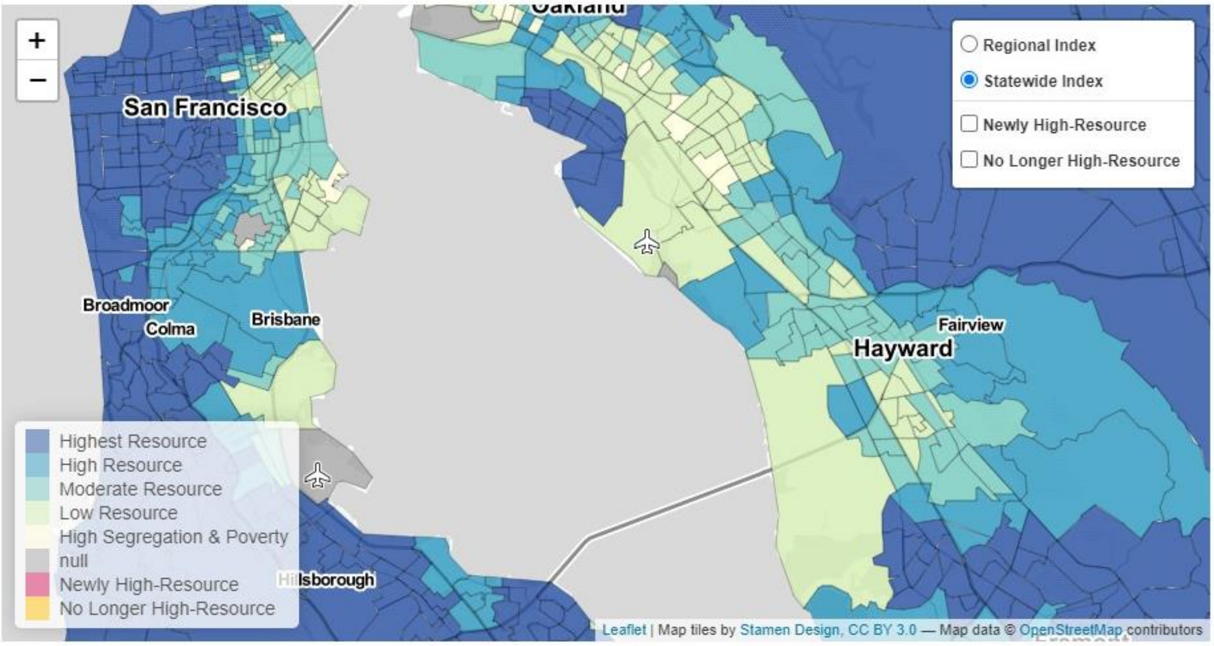
Sincerely,

DocuSigned by:
Capri Juliet Roth
7E191055F4484CF...

Capri Juliet Roth
Executive Vice President, Real Estate Development

ATTACHMENT 1: COMPARITIVE MAPS: STATEWIDE AND REGIONALLY ADJUSTED

San Francisco and East Bay Area using Statewide Map:



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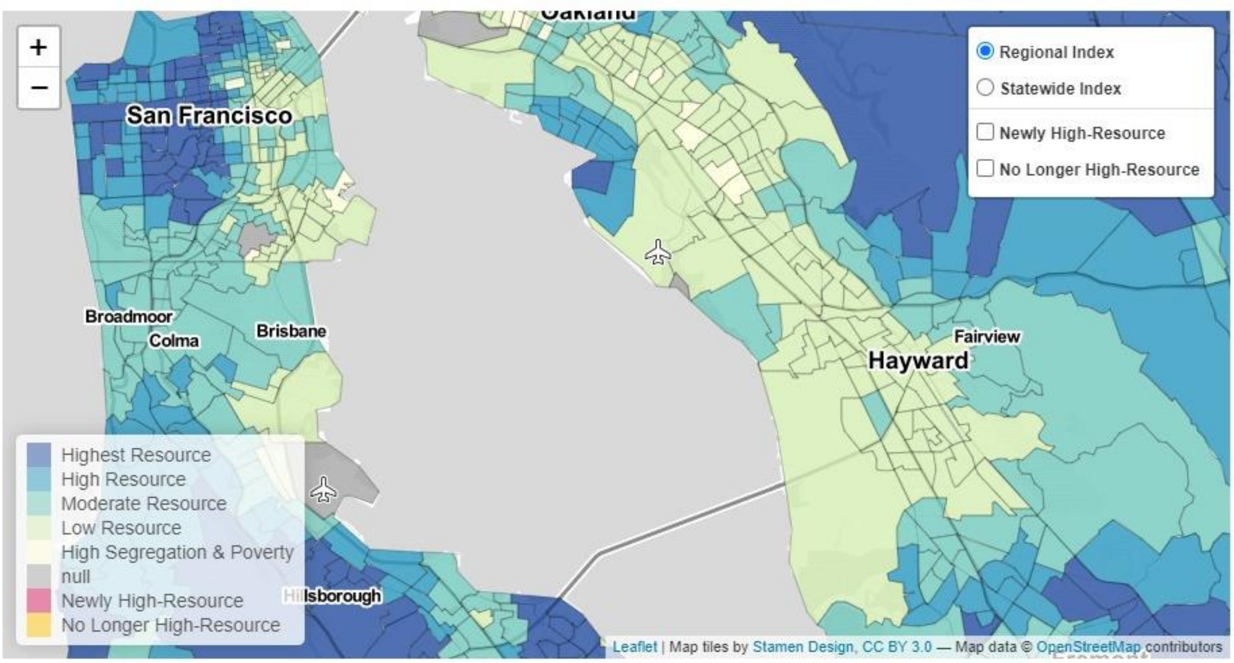
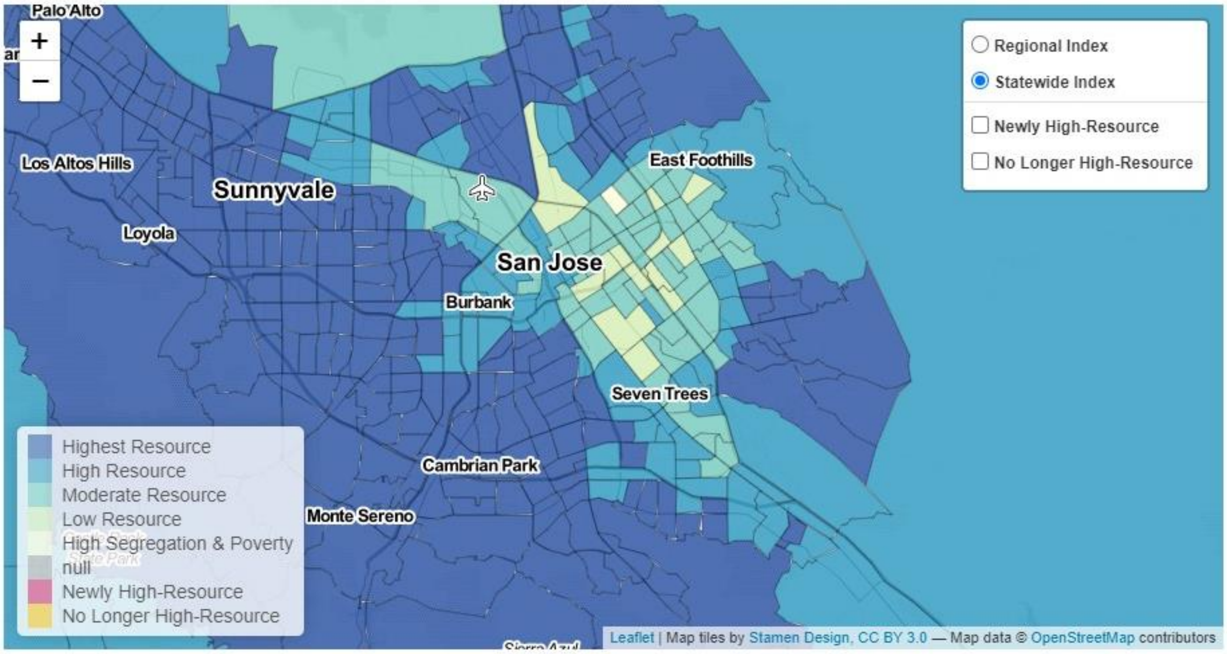


San Jose and Silicon Valley using Statewide Map:



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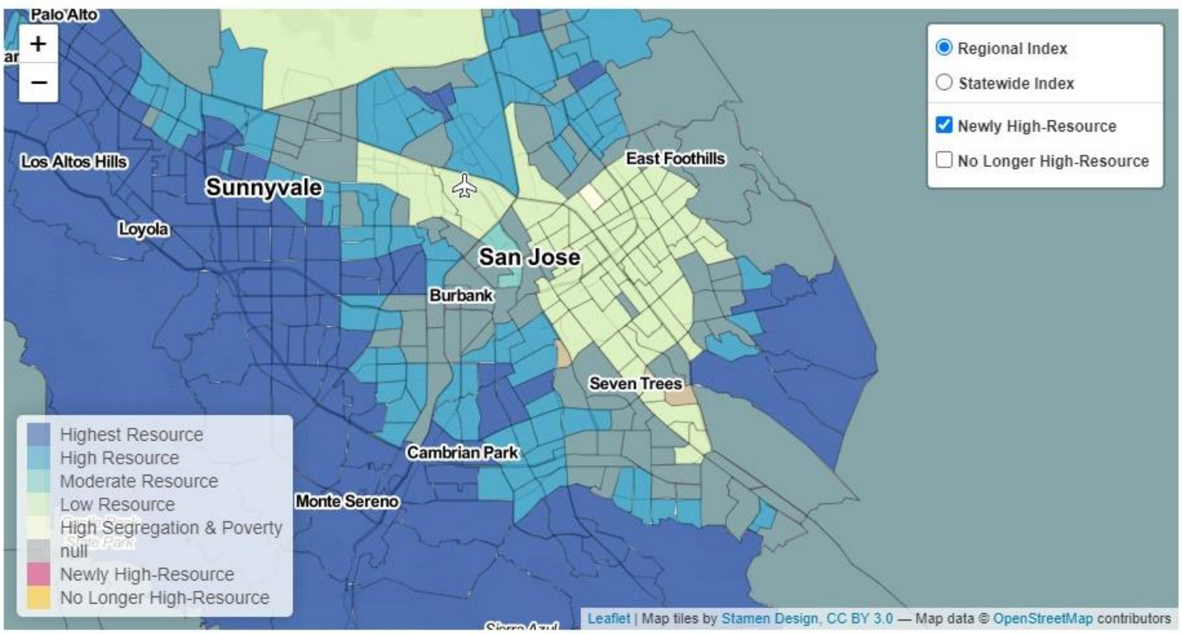
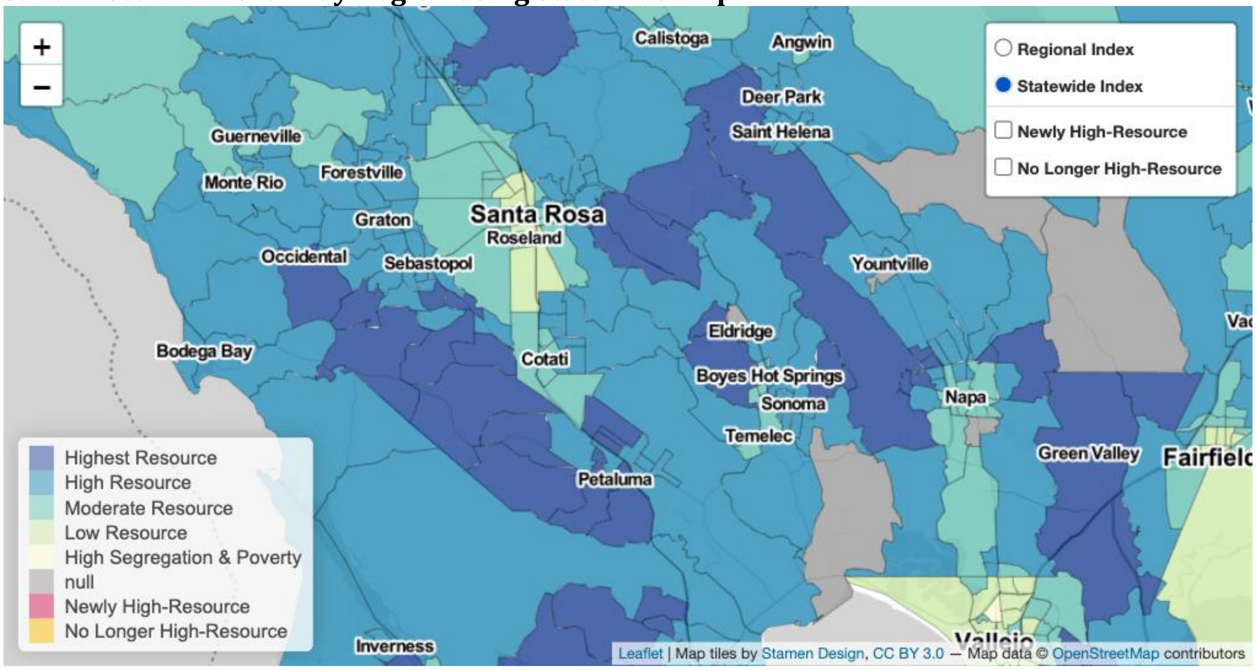


Santa Rosa and North Bay Region using Statewide Map:



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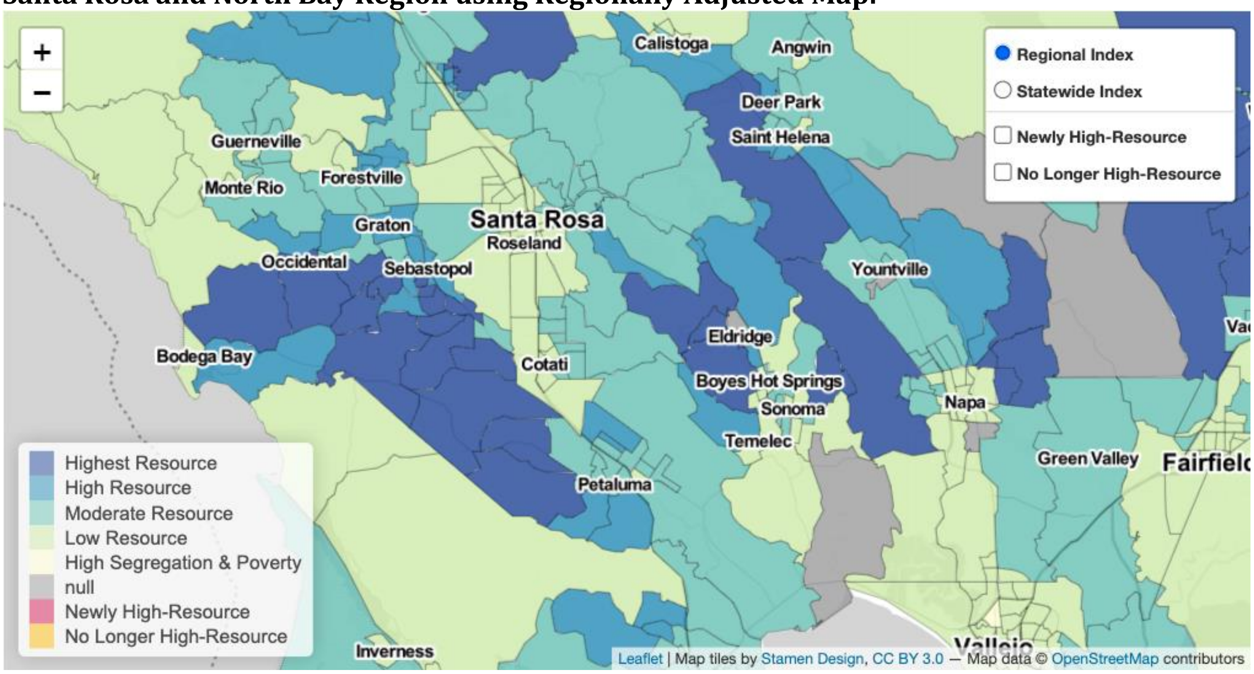

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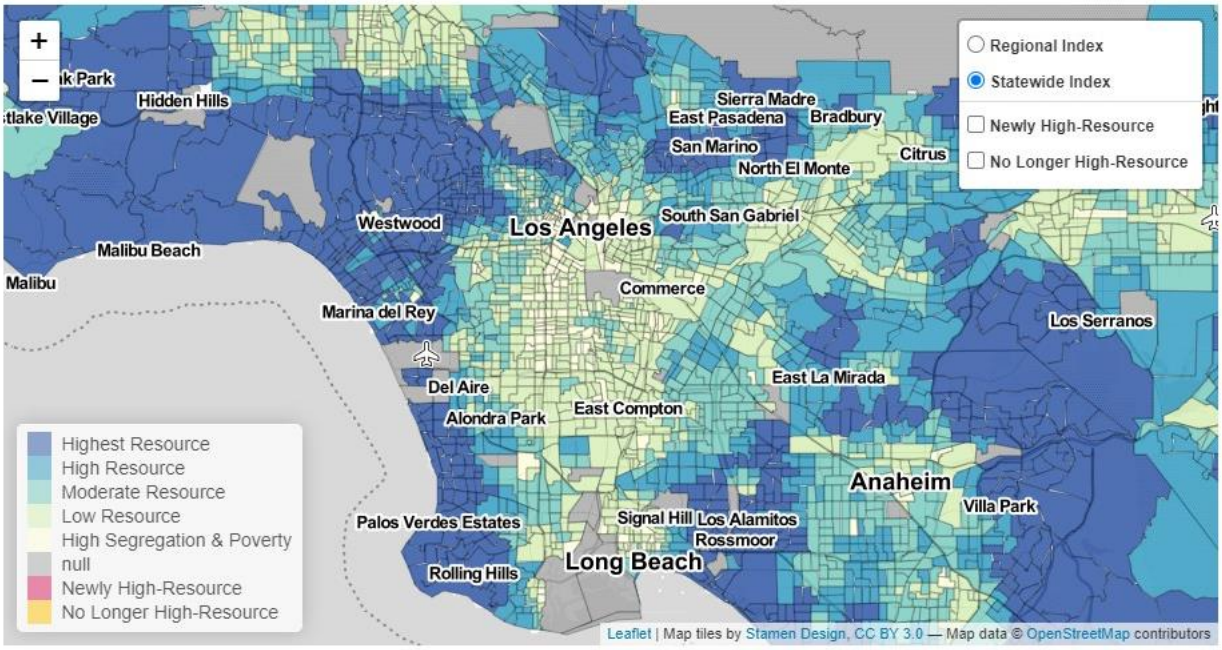

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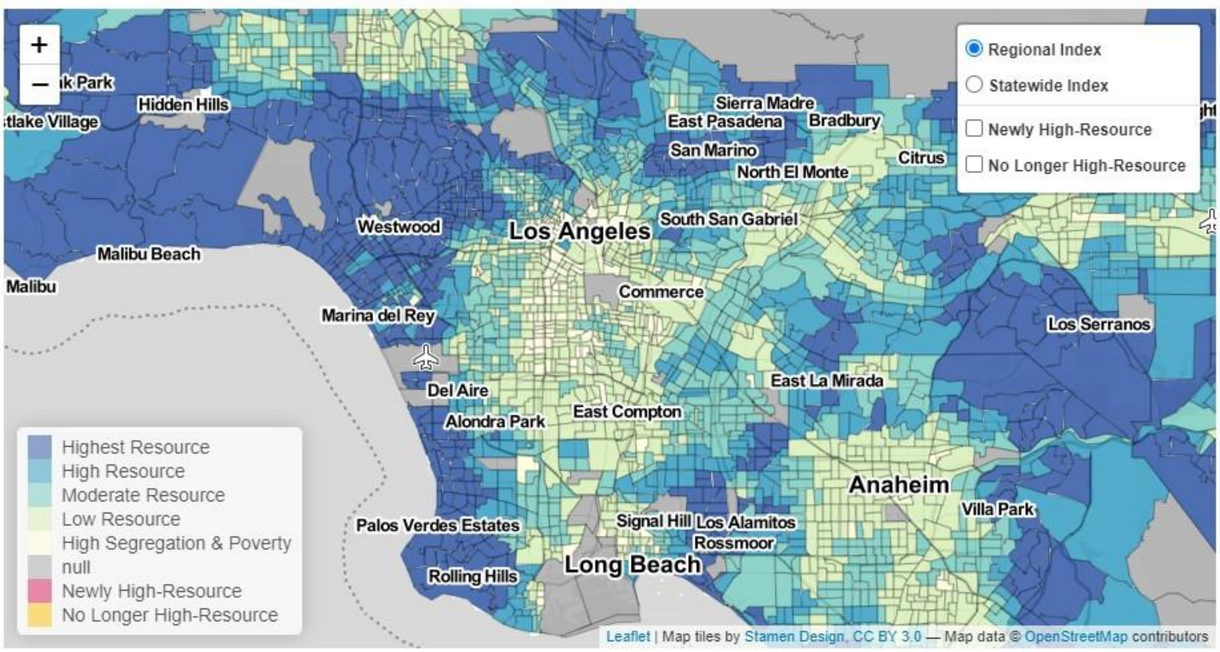

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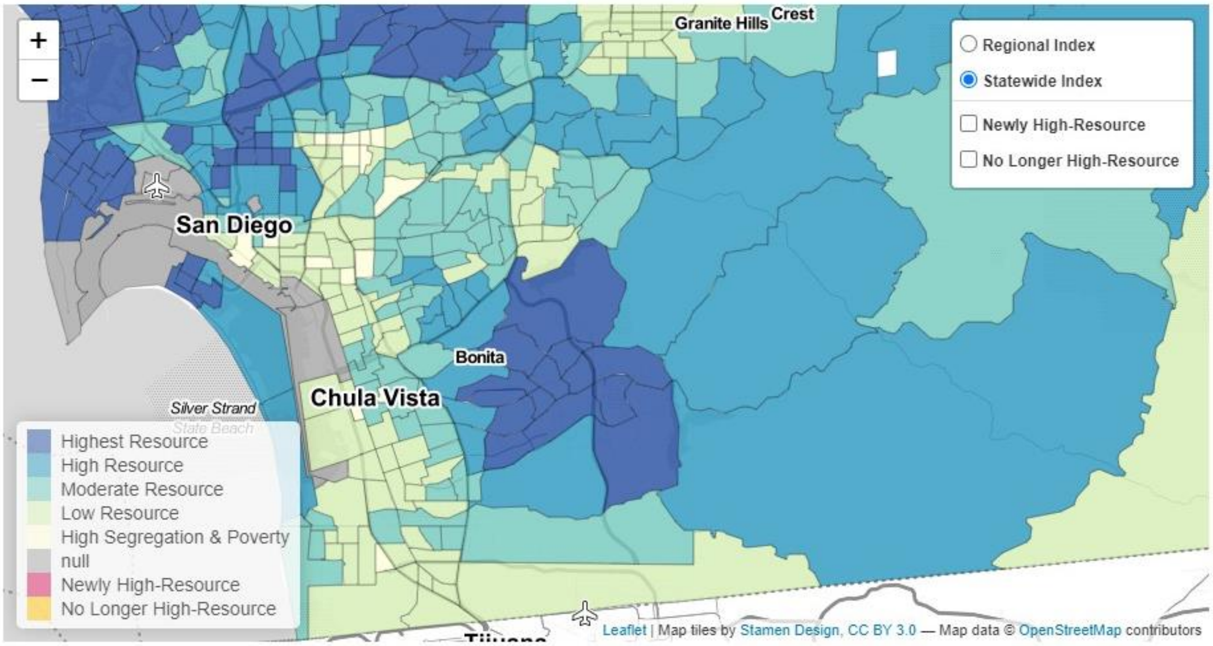

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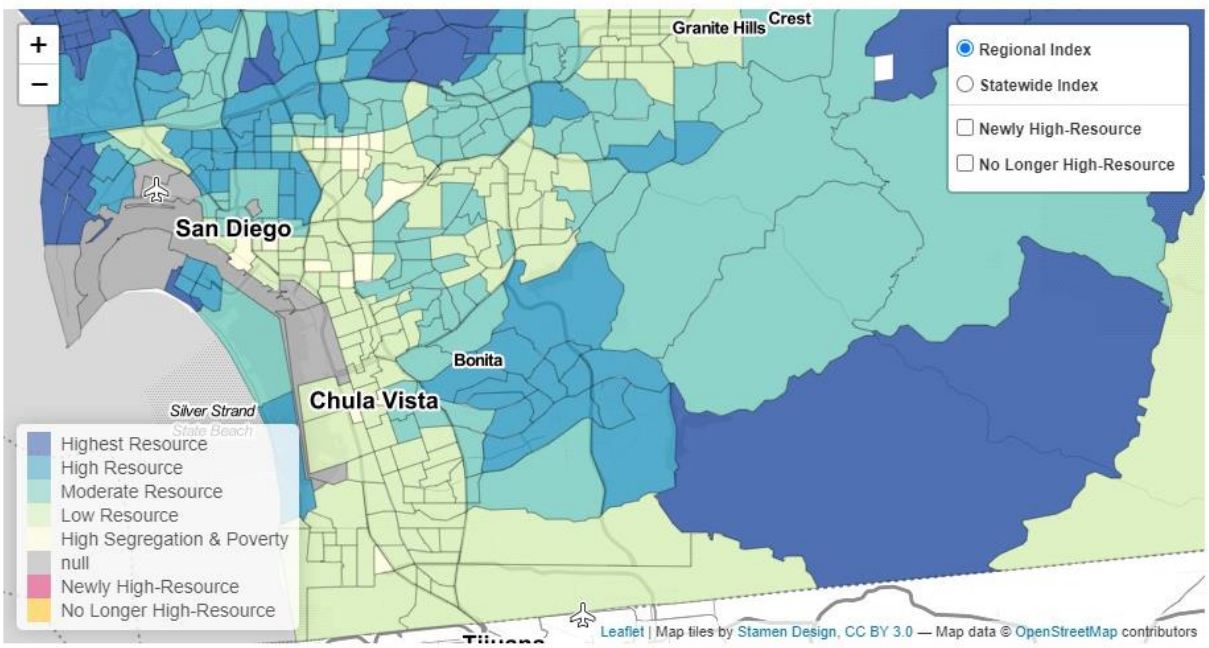

November 20, 2024

Anthony Zeto, Deputy Director
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Megan Kirkeby, Deputy Director Housing Policy Department
California Department of Housing and Community Development
651 Bannon Street
Sacramento, CA 95811

Submitted via email to Anthony.Zeto@treasurer.ca.gov and Megan.Kirkeby@hcd.ca.gov

RE: 2025 Opportunity Map

Dear Mr. Zeto & Ms. Kirkeby,

In response to the Draft 2025 Opportunity Maps and Memo dated October 30, 2024, please accept the following comment on behalf of the California Community-Based Development Collective (CBDC) – a coalition of majority BIPOC-led and staffed affordable housing organizations engaged in community investment and development in neighborhoods with strong cultural and ethnic identities, and our allies. We have appreciated the numerous opportunities to discuss the maps and the broader AFFH framework with HCD staff in recent years, and offer our comments to further improve the impact of these maps, while recognizing their limitations for fully realizing the goals of the AFFH mandate. We continue to strongly encourage CTCAC and HCD to continue robust engagement and efforts to develop a framework for driving investment into communities that have been harmed by the systemic disinvestment related to historic and current racism and redlining.

In response to the Draft 2025 Opportunity Maps, we strongly urge the state to correct a glaring and persistent shortfall, which is the down-labeling of census tracts as "moderate" or "low" resource neighborhoods, when the data itself demonstrates that this is not an accurate characterization of these communities.

Problem Statement: The current version of the Opportunity Map, in order to balance investment throughout the state, labels some areas as Low or Moderate Resource that are actually High Resource Areas according to the raw opportunity data (economic, education, and environmental indicators). This disproportionately affects urban communities of color, which are – as a result – being denied critical housing funding on the false basis that they are not good areas to raise children, when in fact they are excellent places to raise children according to the State's own data.

Solution: HCD staff briefly released the raw opportunity data showing what the maps would look like if they identified High/Moderate/Low Resource Areas statewide, without the requirement to have an equal number of High Resource Areas in each region. See Attachment 1 for snapshot comparisons of these statewide maps to the current adopted maps in key urban areas.

A simple solution to the above problem would be to adopt the statewide map of High/Highest Resource Areas based on the un-adjusted data, and then apply the regionally-adjusted map as an *additive* layer, increasing the number of High/Highest Resource Areas to reflect the census tracts that, while not in the top 20% or 40% of census tracts statewide, do represent the highest resource census tracts in their respective regions; the resulting map would not remove the High Resource designation from any areas that currently receive it because of the regional requirement, but would better capture the range of excellent locations where affordable housing can be incentivized. This would maintain the geographic diversity TCAC wants to see in the maps without misrepresenting urban communities as Low or Moderate Resource that in fact are High Resource according to the opportunity data.

Thank you in advance for your time and consideration of this suggestion.

Sincerely,

Arnulfo Manriquez

President & CEO, MAAC

Duane Bay

Executive Director, East Palo Alto Community Alliance and Neighborhood Development Organization

Janelle Chan

CEO, East Bay Asian Local Development Corporation

Malcolm Yeung

Executive Director, Chinatown Community Development Center

Aubra Levine

Vice President of Real Estate Development, The Unity Council

Regina Celestin Williams

Executive Director, SV@Home

Erich Nakano

Executive Director, Little Tokyo Service Center

Alejandro Martinez

President, CRCD Partners LLC

Omar Carrera

CEO, Canal Alliance

Luis Granados

CEO, Mission Economic Development Agency

Katie Lamont

Interim Co-CEO and Chief Operating Officer, TNDC

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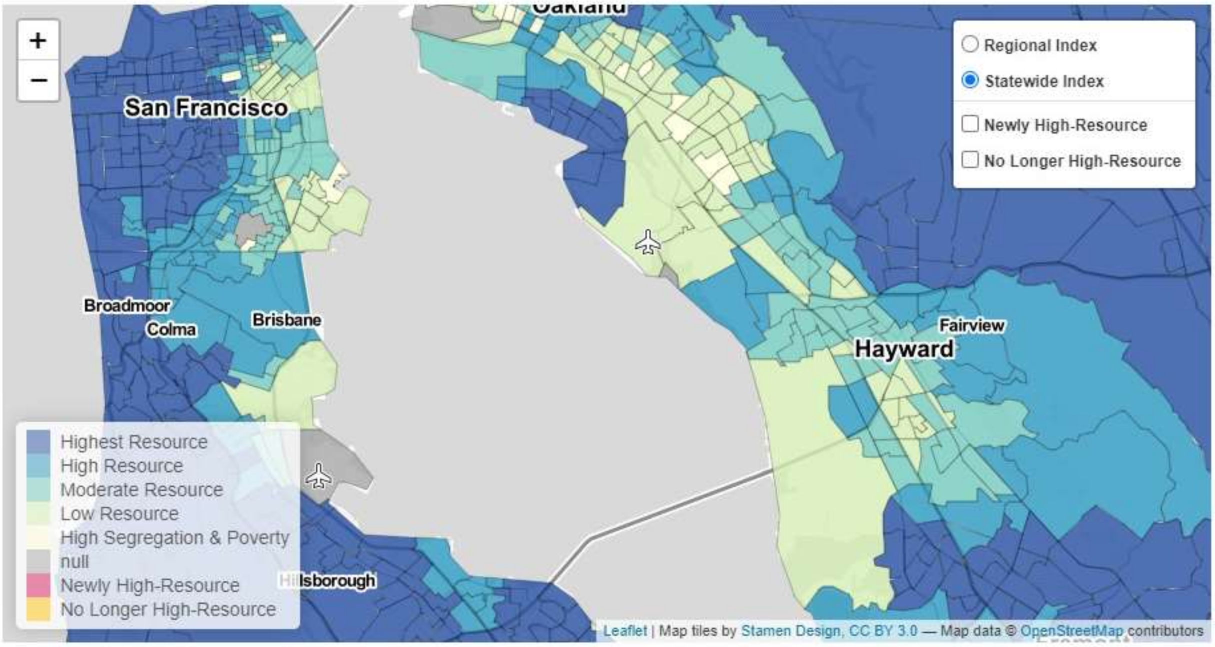

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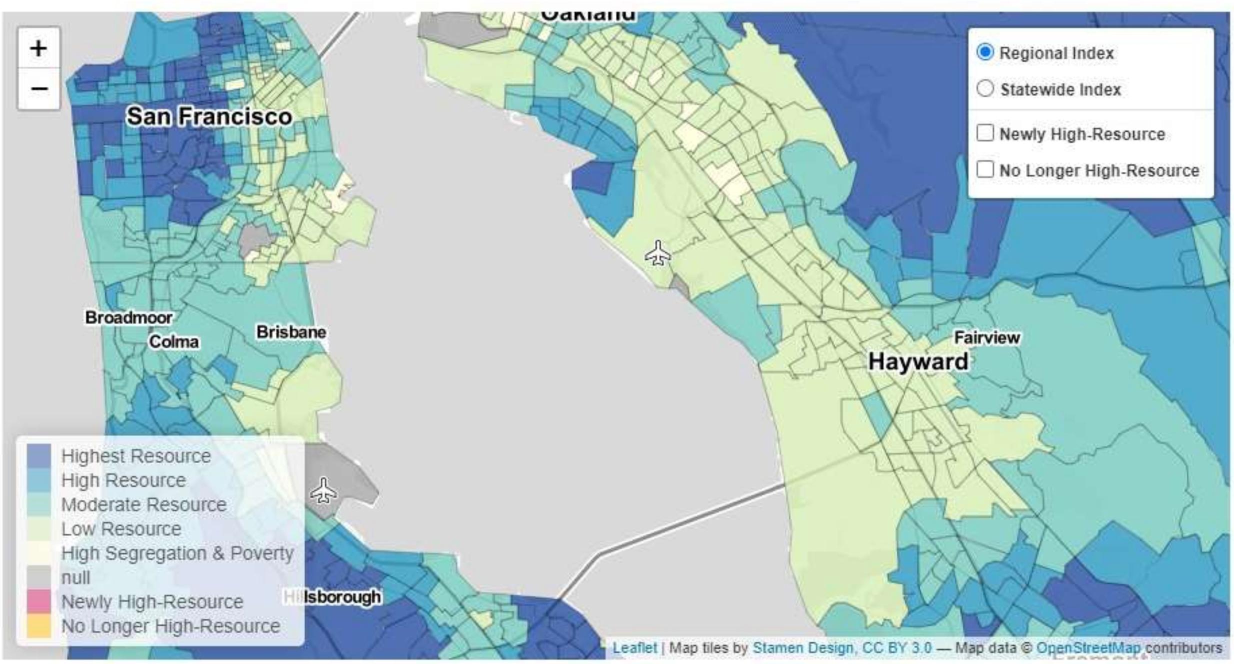

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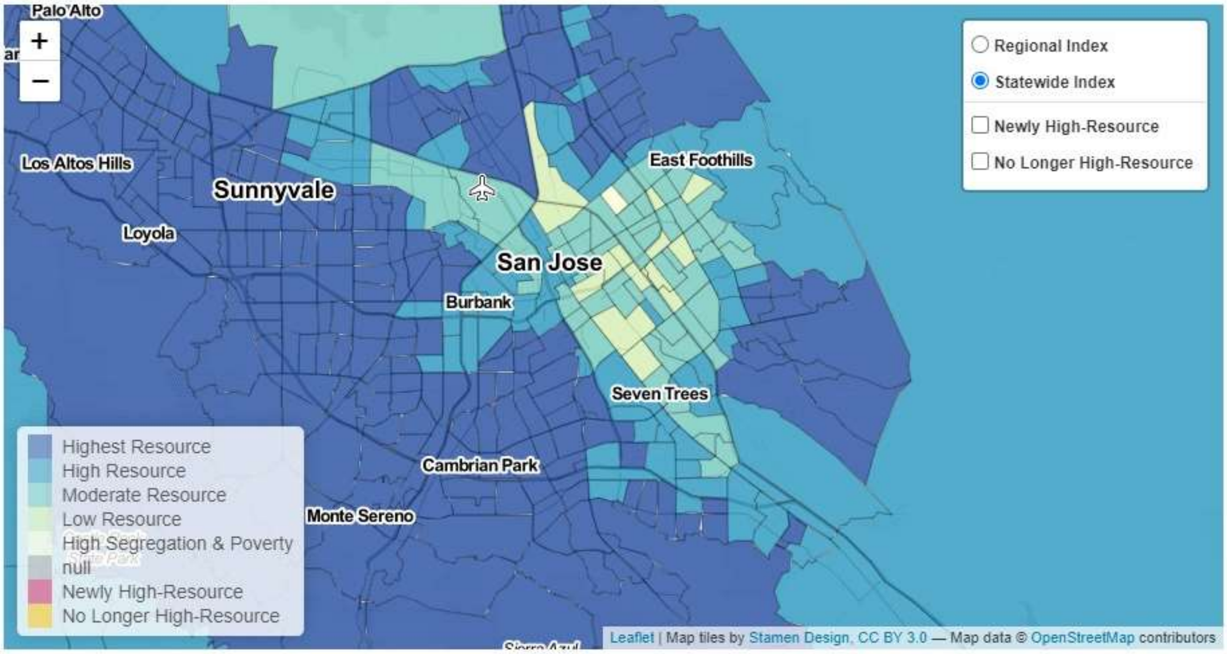

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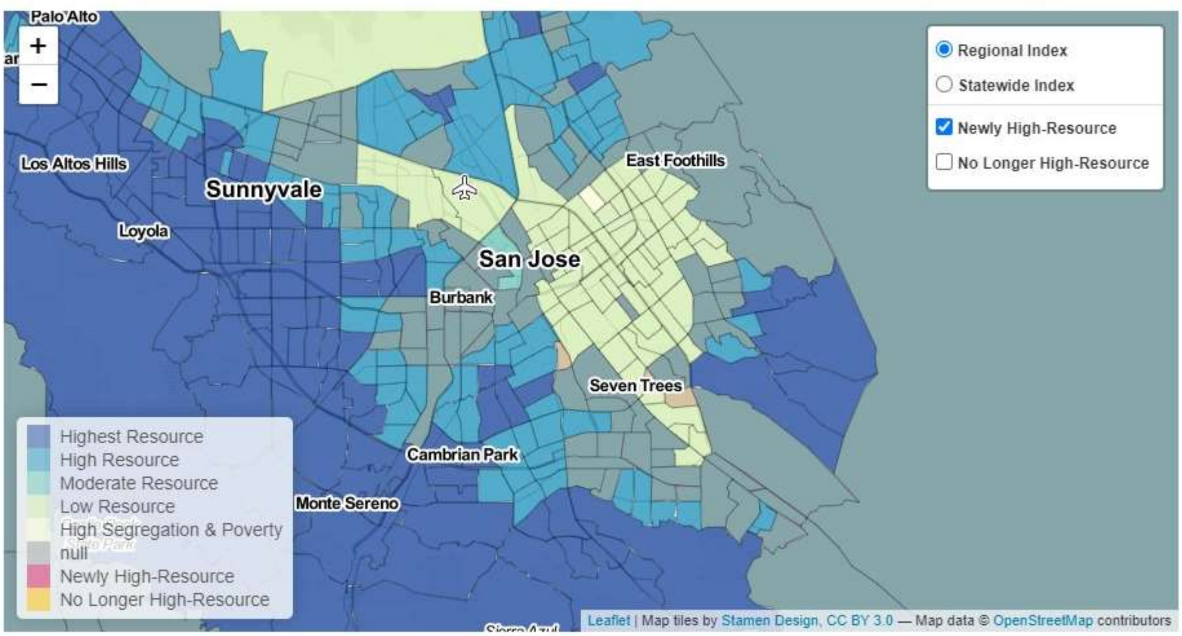

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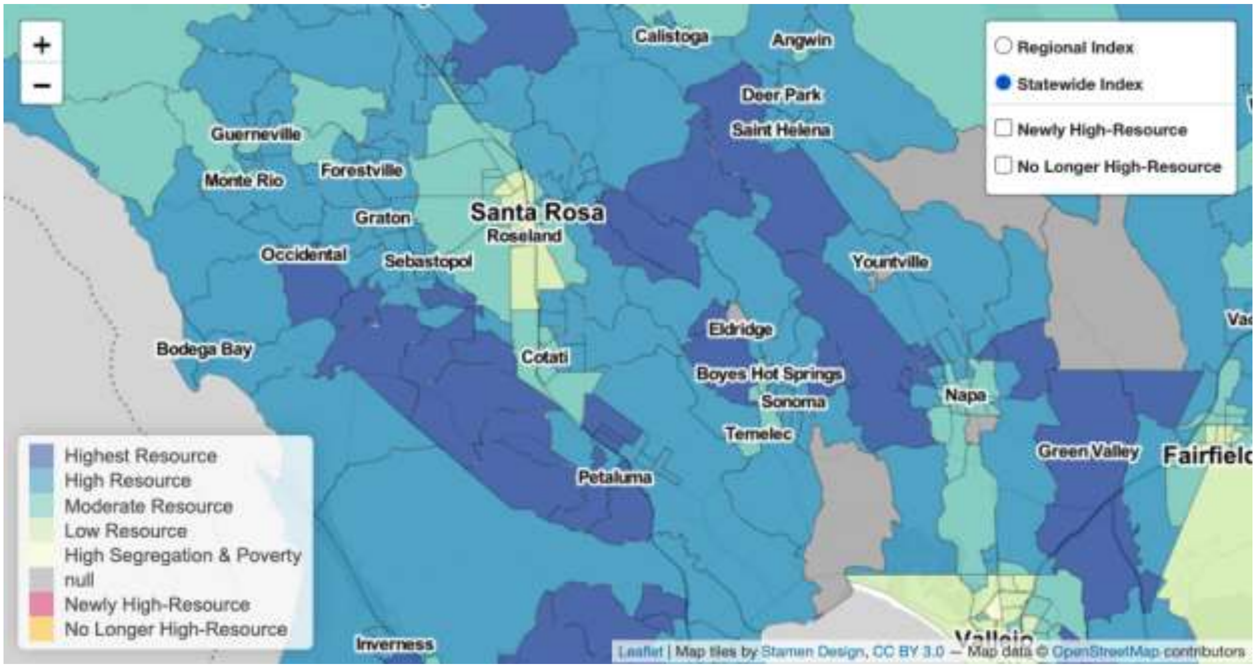

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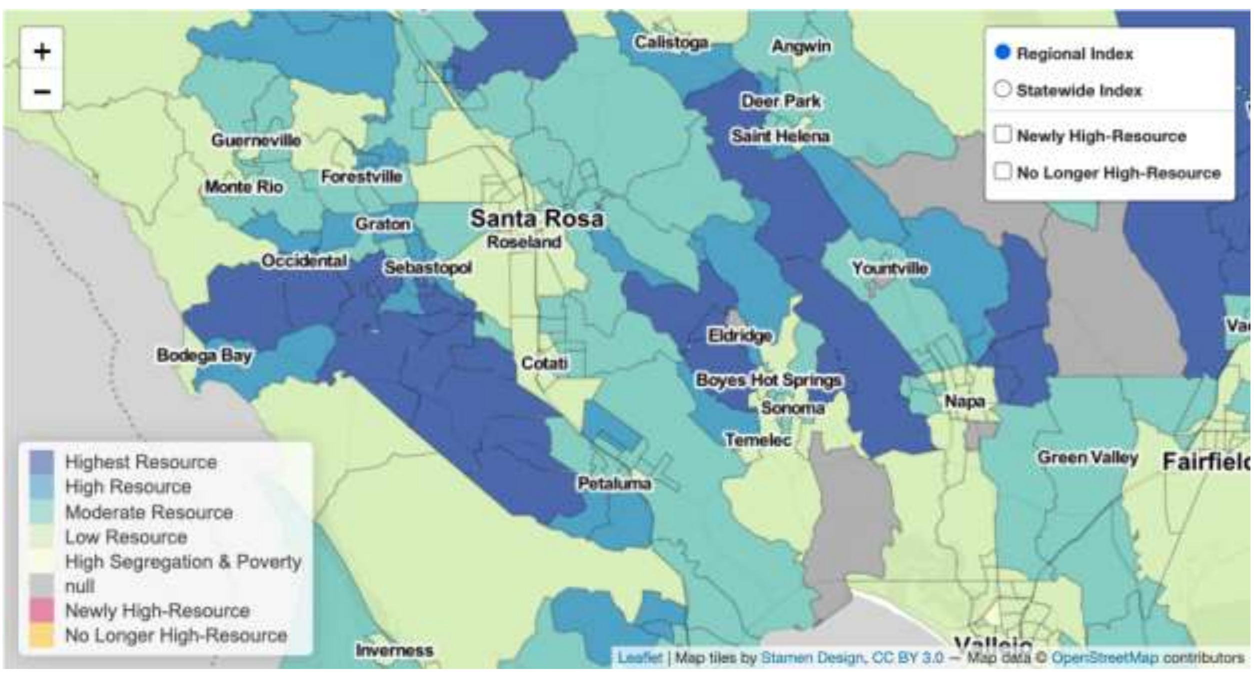

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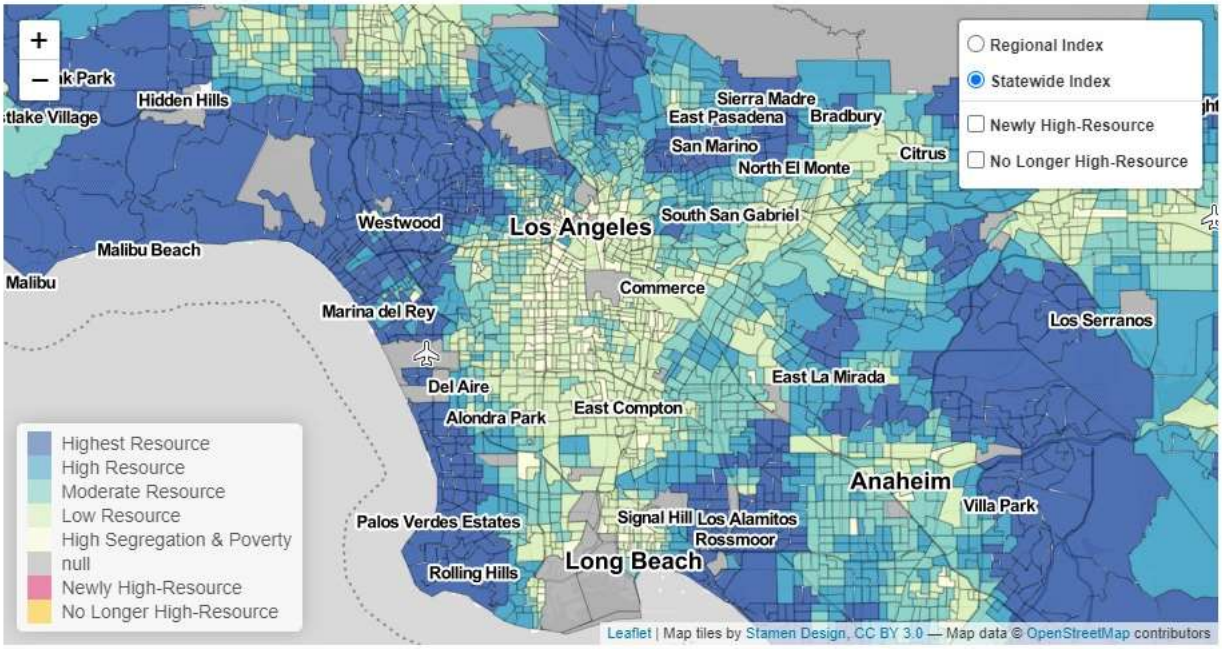

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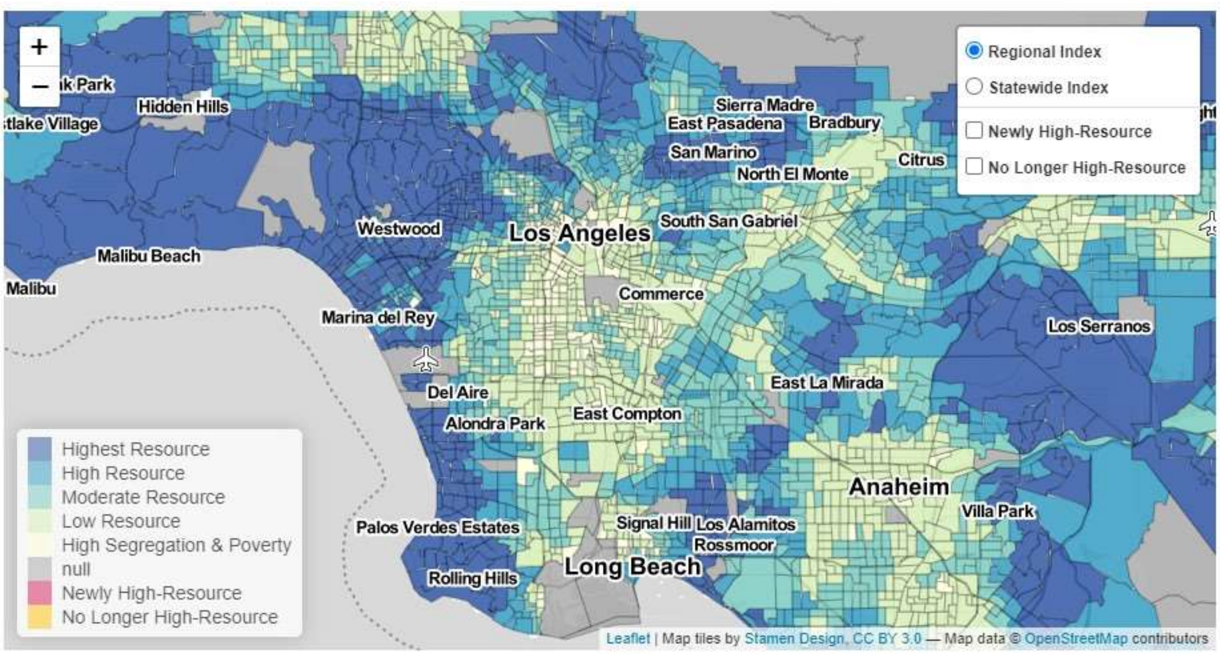

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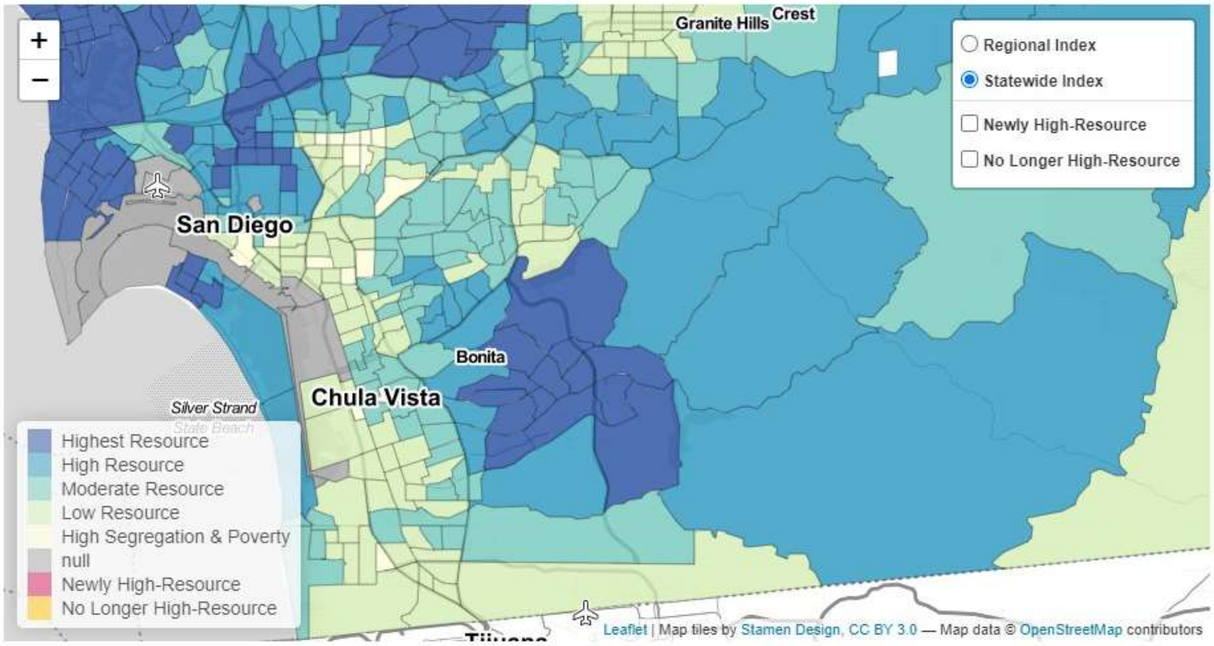

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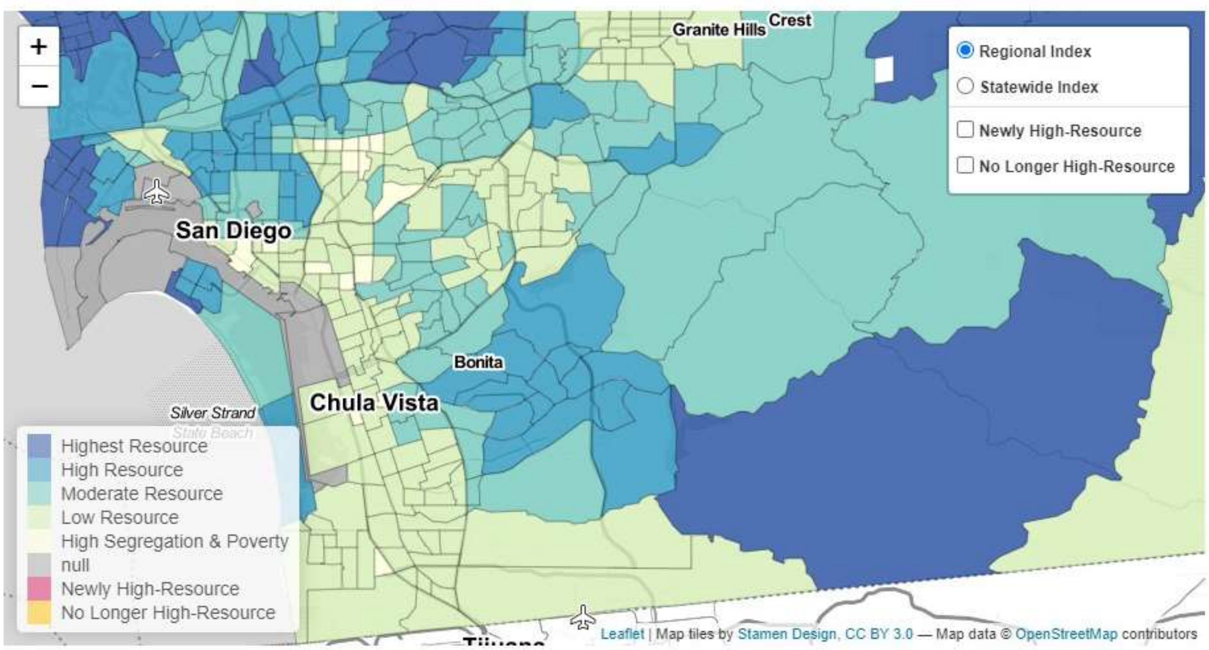

From:	Robin Zimbler
To:	Zeto, Anthony; megan.kirkeby@hcd.ca.gov
Subject:	2025 Opportunity Map
Date:	Monday, November 4, 2024 12:42:47 PM

CAUTION: EXTERNAL MAIL Do not click on links or open attachments unless you trust the sender and know the content is safe.

Thank you for the opportunity to comment on the 2025 Opportunity Map. One general comment—wondering if TCAC/HCD would consider making all block group data (not just the education indicators noted, which did not include educational attainment) on a three-year rolling average as well? I'm definitely in support of using block group data for rural areas, when available, given the large size of rural census tracts, but I do think the data on the block group level is pretty volatile and not always very accurate given the small sample sizes of rural block groups with huge margins of error in the data. I think using a three-year rolling average on all block group data would be more accurate and wondering if TCAC/HCD looked at that?

Thanks,

Robin

Robin Zimbler
Freebird Development Company
1111 Broadway, Suite 300
Oakland, CA 94607 | (510) 319-6959
robin@freebirddev.com | www.freebirddev.com

FREEBIRD DEVELOPMENT

Draft 2025 Methodology for Opportunity and High-Poverty & Segregated Area Mapping Tools

December 2024

Table of Contents

Background and Purpose

About affirmatively furthering fair housing

As defined in state law,[1] affirmatively furthering fair housing (AFFH) means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together:

- Address significant disparities in housing needs and in access to opportunity,
- Replacing segregated living patterns with truly integrated and balanced living patterns,
- Transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and
- Fostering and maintaining compliance with civil rights and fair housing laws.

Purpose of the mapping tools

Each mapping tool described in this methodology documentation is intended to be used to advance specific AFFH objectives. A summary of each mapping tool's purpose is included below.

Opportunity: The opportunity map identifies areas in every region of the state whose characteristics have been shown by research to be associated with positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.[2] As such, the map is intended to inform efforts to advance the AFFH objective of increasing access to opportunity. CTCAC adopted this map into its regulations in December 2017, accompanying new policies aimed at increasing access to high-opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs). For this reason, the research partners aligned this map and the methodology behind it with the competitive funding infrastructure for the 9% LIHTC program (e.g., geographic competition). The map has also since been used to inform similar policies in other state affordable housing funding programs, such as HCD's Multifamily Finance Super NOFA and the California Debt Limit Allocation Committee's regulations. However, some methodological adjustments may be called for if the map is applied to broader contexts and different application processes.

High-Poverty & Segregated Areas: The high-poverty and segregated overlay identifies areas that meet standards for both high or "concentrated" poverty rates (30% or more of the population below the federal poverty line) and racial segregation (overrepresentation of individual non-white racial/ethnic groups and/or people of color as a whole relative to the county). The use of this overlay is grounded in two guiding AFFH objectives: to avoid further segregation and poverty concentration, and to increase access to opportunity for low-income families.

[1] For more information on HCD's approach to advancing AFFH objectives, see: https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing.

[2] The mapping methodology is narrowly tailored towards upward mobility for children of low-income families. Although the methodology includes indicators relevant to other populations, some indicators associated with positive outcomes for those populations may not be included.

About the research partners

In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) convened a group of independent organizations and research centers, referred to henceforth as the “research partners,” to provide research support and develop evidence-based approaches – including the mapping tools described in this methodology documentation – to help advance AFFH objectives.[3]

[3] The research partners currently include representation from the Othering & Belonging Institute at UC Berkeley, the Terner Center for Housing Innovation at UC Berkeley, and the California Housing Partnership.

Opportunity Methodology

Overview of the mapping approach

One of the challenges in creating an opportunity map to inform statewide housing policy is that California contains significant regional variation – from Central Valley cities and towns, to Los Angeles, to the San Francisco Bay Area, to rural areas throughout the state.

Using absolute thresholds for place-based opportunity could introduce comparisons between very different areas of the state that make little sense from a policy perspective—in effect, holding a farming community to the same standard as a dense, urbanized neighborhood in one of the state's coastal cities. Deriving opportunity scores through comparison to the entirety of the state would align neither with realistic moving patterns of families, nor with the infrastructure for affordable housing funding programs—where applicants for family-targeted affordable housing typically compete with other applicants in the same region, and rural applicants compete in a separate funding pool.

To allow state housing agencies to incentivize equitable development patterns within each part of the state, the Opportunity Map identifies the neighborhoods that score better across nine economic, educational, and environmental indicators relative to other neighborhoods in the same region. These indicators are described in detail below.

A neighborhood's score for each economic and educational indicator (described later in this document) is determined by whether it falls above or below the median (50th percentile) tract or block group value within each region. Each indicator that falls above the regional median adds 1 point to the final score.

The opportunity score also reflects local environmental conditions. The Opportunity Map uses a subset of data from the CalEnviroScreen 4.0 tool to identify the geographies that have the highest potential – defined here as ranking in the highest 5% of regional environmental burden – to expose vulnerable populations to nearby health and safety threats. Places with this "hazard flag" have 1 point subtracted from the final score. This approach is described in more detail below.

Regional median and top 5% values are calculated based on urban tracts and/or rural block groups within each region.[4] For counties outside of the 8 urban regions, defined below, regional medians are calculated separately for each county. To account for the presence of missing values for indicators in certain tracts or block groups, any tracts or rural block groups for which more than 2 of the indicators are missing are removed from consideration and receive no designation.

Using this method, the final scores are divided into four primary categories:

- 8 or 9 = "Highest Resource"
- 6 or 7 = "High Resource"

[4] For rural geographies, the regional medians for economic and educational indicators are calculated at the block group level. However, because CalEnvrioScreen data are not available at the block group level, environmental hazard percentile ranks are calculated at the census tract level. The environmental hazard percentile rank calculated at the census tract level is assigned to each of the block groups within a given rural census tract.

- 4 or 5 = “Moderate Resource”
- 3 or lower = “Low Resource”

Excluding tracts or block groups

The tool also excludes certain census areas from being categorized. To improve the accuracy of the mapping, tracts and rural block groups with the following characteristics are excluded from categorization based on indicator scores:

- Areas with unreliable data, as defined earlier in this document;
- Areas where people residing in institutional facilities make up at least 75 percent of the population;[5]
- Areas with population density below 25 people per square mile and total population below 750; and
- Areas where at least half of the age 16+ population is employed by the armed forces, in order to exclude military base areas where it is not possible to develop non-military affordable housing.[6]

Excluded tracts and rural block groups are identified as “Insufficient Data” on the mapping tool or “N/A” in the public data file.

Regional boundaries

To determine the regional definitions, the Opportunity Map mostly mirrors the geographic apportionments designated within CTCAC’s regulations but bundles some of these apportionments to create more accurate regions, with guidance from CTCAC and HCD. Following is a list of the opportunity map regions with the respective geographic apportionment(s) captured in that region:

Opportunity Mapping Region	**Geographic Apportionment in CTCAC Regulations**
Los Angeles Region	City of Los Angeles
	Balance of Los Angeles County
Bay Area Region	East Bay Region
	South and West Bay Region
	San Francisco County
	Marin, Napa, Solano, and Sonoma Counties (from the Northern Region)
Central Valley Region	Central Valley Region
San Diego County	San Diego County
Capital Region	Capital Region minus Sutter and Yuba Counties
Inland Empire Region	Inland Empire Region
Orange County	Orange County

[5] Institutional facilities include adult correctional facilities, juvenile facilities, skilled-nursing facilities, and other institutional facilities such as mental (psychiatric) hospitals and in-patient hospice facilities. Percentage of population residing in institutional facilities is derived from 2020 Census table P5_002N.
[6] Percentage of population employed by the armed forces is derived from ACS table B23025_006.

Central Coast Region	Central Coast Region
Rural Areas	Non-metropolitan counties, plus Butte, Shasta, Sutter, and Yuba Counties, as well as tracts that are eligible for Section 515[7]

Please refer to the CTCAC regulations for a list of counties included in each geographic apportionment.

Identifying and categorizing opportunity in rural tracts

The Opportunity Map measures opportunity in rural parts of the state at the block group level, rather than at the tract level as in the rest of the state. Since tracts in rural areas of California are approximately 37 times larger in land area than tracts in non-rural areas, tract-level data in rural areas may mask over variation in opportunity and resources within these tracts. Assessing opportunity at the block group level in rural areas reduces this difference by 90 percent (each rural tract contains approximately three block groups), and thus allows for finer-grained analysis.

Although rural areas are evaluated at the block group level, the rural designation is assigned by Census tract, rather than block group, to maintain consistency with urban and rural evaluation, i.e. to avoid a scenario in which a tract is split between rural and urban areas, the latter of which are evaluated by tract. To capture the diverse array of rural communities across the state—both within and outside of designated metropolitan statistical areas—this methodology takes a three-tiered approach to identifying rural census tracts. For mapping purposes, tracts that fall in the "Rural Areas" category include:

1. All tracts in the following Non-Metropolitan counties: Alpine, Amador, Calaveras, Colusa, Del Norte, Glenn, Humboldt, Inyo, Lake, Lassen, Mariposa, Mendocino, Modoc, Mono, Nevada, Plumas, Sierra, Siskiyou, Tehama, Trinity, and Tuolumne;
2. All tracts in Butte, Shasta, Sutter, and Yuba Counties;
3. Any other non-urbanized block group with at least half its population in an area deemed as rural on the U.S. Department of Agriculture's online multifamily mapping application.

Any tract that falls within the 25 counties listed above is designated as a "Rural Area." Beyond those counties, the research partners identified areas in the state that correspond with rural areas on the U.S. Department of Agriculture's online multifamily maps.

These areas were then overlaid with census tract boundaries to identify what share of the population within a tract falls within the rural area. If at least 50 percent of a tract's population is located within census blocks which have their population-weighted centroid within the rural area, that census tract was allocated to the "Rural Areas" designation.[8]

For block groups that fall within the rural designation, the maps take a slightly different approach to allocating resource categories. Because rural areas span the state (including both poorer and wealthier regions), rural block groups are ranked in comparison to other rural block groups within the same county, as long as there are at least two observations for any given indicator.

[7] The Section 515 Rural Rental Housing program is a USDA program that provides affordable rental housing for very low-, low-, and moderate-income families, elderly persons, and persons with disabilities in rural areas.
[8] Blocks are the smallest geographic unit available in the U.S. Census.

Indicators

Indicators used in the CTCAC/HCD Opportunity Map are selected based on the following criteria:

- Evidence from peer-reviewed research that the indicator is linked to improved life outcomes for low-income families, particularly children
- Reliable data
- Publicly available data
- Statewide data coverage
- Fine geographic detail[9]

See below for the full list of opportunity indicators, measures, and data sources.

Indicator	Measure	Data Source	Table
Above 200 Percent of Poverty	Percent of population with income above 200% of federal poverty line	2018-2022 ACS	Table C17002
Adult Education	Percent of adults with a bachelor's degree or above	2018-2022 ACS	Table B15003
Employment	Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces	2018-2022 ACS	Table B23024
Median Home Value	Value of owner-occupied units	2018-2022 ACS	Table B25077
Environmental Burden	CalEnviroScreen 4.0 Site-Based Pollution Indicators	CalEnviroScreen 4.0	Variables: solid waste sites, groundwater threats, cleanup sites, hazardous waste facilities
Math proficiency	Percentage of 4th graders who meet or exceed math proficiency standards	2018-2019[10], 2021-2022, 2022-2023 California Department of Education (DOE)	
Reading proficiency	Percentage of 4th graders who meet or exceed literacy standards	2018-2019, 2021-2022, 2022-2023 CA DOE	

[9] Data include point source coordinates or are aggregated into small-area geographies such as Census tracts and block groups.

[10] 2018-2019 math and reading score data are used because data are not available for 2019-2020 and relatively few schools administered tests in 2020-2021 due to pandemic related complications.

High school graduation rate	Percentage of high school cohort that graduated on time	2020-2021, 2021-2022, 2022-2023 CA DOE	
Student poverty rate	Percentage of students not receiving free or reduced-price lunch	2021-2022, 2022-2023, 2023-2024 CA DOE	

It should also be acknowledged that an opportunity map's accuracy in measuring place-based resources is limited by the accuracy of the data underlying it. Data may be derived from self-reported surveys of subsets of an area's population, and sometimes may not be recorded or reliable in some areas. Further, even the most recent publicly available datasets typically lag by two years, meaning they may not reflect the most recent conditions in areas undergoing very rapid change. The methodology described in this document attempts to address each of these limitations to the degree possible. In addition, the research partners update the data contained within the mapping tool annually and review the methodology to make improvements over time.[11]

The rationale and metric for each indicator (economic, education, and environmental) is described in more detail below.

Economic

Poverty Rate. Neighborhood poverty rates have been shown through numerous studies to be a strong indicator of an area's level of resources, risk, and opportunity, and predictor of key life outcomes for low income children in particular. Living in high-poverty areas increases exposure to localized risks—such as violent crime, low-quality and underfunded schools, and pollution—that have been shown to contribute to toxic stress, poor physical and mental health, low educational attainment, and impaired cognitive development in children. On the other hand, living in low poverty areas has been shown to be associated with substantial benefits such as higher educational attainment and long-term earnings increases for low-income children, as well as improved mental and physical health for both children and adults.[12][13][14]

This indicator is measured using two hundred percent of the poverty line to reflect the higher cost of living in California. Because each indicator is designed to measure opportunity in a positive sense, this indicator is measured as the percent of a tract's or rural block group's residents who live above 200 percent of the federal poverty line.[15]

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[11] The code used to calculate the opportunity scores also goes through an annual review process for quality assurance. Year over year changes in opportunity designations are also reviewed on an annual basis.
[12] For a summary of this research, see "Evidence Shows that Neighborhoods Affect Children's Well-Being and Long-Term Success" in Sard, B., & Rice, D. (2016). Realizing the Housing Voucher Program's potential to enable families to move to better neighborhoods. Washington, DC: Center on Budget and Policy Priorities.
[13] Chetty, R., Hendren, N., & Katz, L.F. (2015). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment. Cambridge, MA: Harvard University and National Bureau of Economic Research. http://www.equality-of-opportunity.org/assets/documents/mto_paper.pdf
[14] Chetty, R., Friedman, J., Hendren, N., Jones, M., Porter, S. (2018). The Opportunity Atlas: Mapping the Childhood Roots of Social Mobility. Opportunity Insights. NBER Working Paper No. 25147.
[15] In 2024, the federal poverty line for a family of four is $31,200.

To prevent college towns from negatively impacting an area's resource score, college and graduate students are removed from the above 200 percent of poverty calculation in areas where they comprise at least 25% of the population. An internal analysis found that without this adjustment, most tracts with high proportions of college students have lower than typical scores relative to the region, many of which are high resource according to other indicators, likely due to the Census classifying many unemployed and partially employed students living off-campus up as poor.

Adult Education Rate. The tract-level share of adults that have earned a bachelor's degree has been shown to be highly correlated with rates of upward economic mobility for low-income children.[16] Higher rates of post-secondary attainment are also predictive of higher wages and improved work opportunities for adults, meaning that families are less likely to be economically insecure.[17] Research has indicated that children living in neighborhoods with a higher average socioeconomic status (SES) are more likely to graduate from high school. Additionally, starting at age three, children living in higher SES neighborhoods and/or with a greater percentage of managerial or professional residents begin to perform better on IQ tests than their peers who live in lower SES neighborhoods.[18] Additional research has shown that an increasing supply of college graduates is associated with higher earnings for other labor force participants. These findings are especially noteworthy because they show that these "spillover" effects are even more pronounced for less skilled workers; a more highly educated labor force leads to higher wage gains for high school dropouts and high school graduates than those with college degrees.[19]

This indicator is measured by calculating the percent of adults 25 years and older who have earned at least a bachelor's degree in each tract and rural block group.

Employment Rate. The tract-level share of employed adults has been shown to be highly correlated with rates of upward economic mobility for low-income children.[20] Adult unemployment is commonly considered to be an indicator of neighborhood disadvantage that affects not just the individuals who do not have jobs, but members of the entire community.[21] Areas with low levels of employment see outcomes similar to those with high poverty rates, including poor health outcomes, low birthweight babies, and violent crime.[22]

The employment rate is calculated as the percent of individuals in each tract and rural block group age 20-64 who are employed in either the civilian labor force or the armed forces. The employment rate is used because the unemployment rate does not account for individuals who have dropped out of the labor force due to disillusionment with their job prospects.

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[16] Chetty, R., Friedman, J., Hendren, N., Jones, M., Porter, S. (2018).
[17] See Bureau of Labor Statistics (2016), "Unemployment Rates and Educational Attainment." Accessed at https://www.bls.gov/emp/ep_chart_001.htm.
[18] For a full review of the literature on how living in neighborhoods with high socio-economic statuses and/or high adult education rates, see Leventhal, T., & Brooks-Gunn, J. (2000). The neighborhoods they live in: The effects of neighborhood residence on child and adolescent outcomes. Psychological Bulletin, 126(2), 309–337. https://doi.org/10.1037//0033- 2909.126.2.309.
[19] Moretti, E. (2004). Estimating the social return to higher education: evidence from longitudinal and repeated cross-sectional data. Journal of Econometrics, 121(1), 175–212. https://doi.org/10.1016/j.jeconom.2003.10.015.
[20] Chetty, R., Friedman, J., Hendren, N., Jones, M., Porter, S. (2018).
[21] 1 Santiago, C. D., Wadsworth, M. E., & Stump, J. (2011). Socioeconomic status, neighborhood disadvantage, and povertyrelated stress: Prospective effects on psychological syndromes among diverse low-income families. Journal of Economic Psychology, 32(2), 218–230. https://doi.org/10.1016/j.joep.2009.10.008.
[22] Pearl, M., Braveman, P., & Abrams, B. (2001). The Relationship of Neighborhood Socioeconomic Characteristics to Birthweight Among 5 Ethnic Groups in California. American Journal of Public Health, 91(11), 1808–1814.

Home Value. Home value is a strong proxy for neighborhood quality and community resources. Research suggests that neighborhood characteristics, such as school quality, public resources, crime rates, environmental quality and even perceived social benefits are all reflected in home values. For example, research has demonstrated a link between school quality and house prices.[23] Conversely, disruption of schools (such as school closings and redistricting) can be reflected in declining home values.[24] Crime, too, has been shown to negatively impact house prices, especially the prevalence of violent crime.[25] Researchers have quantified the extent to which factors such as clean air, open spaces, and even well-educated neighbors can all capitalize into house prices.[26][27][28] Collectively, home prices are directly impacted by a variety of neighborhood characteristics, and are to a large extent a bellwether of the quality of the neighborhood itself.

This indicator is calculated as the median home value (dollars) of owner-occupied housing units for every Census tract and rural block group.

Education

Starting with the draft 2025 Opportunity Map, a three-year rolling average of the education indicators (e.g., reading and math proficiency, high school graduation rates, and student poverty) replaced the previous practice of using a single year of data to measure these indicators. The three-year rolling average allows real changes to emerge in map updates over time while limiting the effect of noisy data (year to year variability in the data that does not necessarily reflect real changes). This approach increases year-to-year stability in opportunity designations. Further, averaging multiple years of education data mirrors the approach used for the economic indicators in the map (the ACS estimates used for the economic indicators span 5 years of data).

Internal analysis revealed that the map's education indicators tend to be the primary drivers of year-to-year changes in resource designations. The three-year rolling average decreases the number of tracts and block groups shifting by two or more resource designations from one year to another. These cases, though marginal, represent a higher degree of year-to-year instability that indicates possible influence of noisy underlying data. Data used in the Opportunity Map that does not represent real or lasting change – whether due to data reporting error, sampling error, or other sources – present a potential source of instability that should be minimized to the degree practicable, particularly for a mapping tool being used in policy and programs with real stakes over multi-year periods.

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[23] Nguyen-Hoang, P., & Yinger, J. (2011). The capitalization of school quality into house values: A review. Journal of Housing Economics, 20(1), 30–48. https://doi.org/10.1016/j.jhe.2011.02.001.
[24] Bogart, W. & Cromwell, B. (2000). How Much is a Neighborhood School Worth? Journal of Urban Economics 47, 280-305.
[25] Gibbons, S. (2004). The costs of urban property crime. The Economic Journal, 114(499).
[26] Smith, V. K., & Huang, J.-C. (1995). Can Markets Value Air Quality? A Meta-Analysis of Hedonic Property Value Models. Journal of Political Economy, 103(1), 209–227. https://doi.org/10.1086/261981.
[27] Bolitzer, B., & Netusil, N. (2000). The impact of open spaces on property values in Portland, Oregon. Journal of Environmental Management, 59(3), 185–193. https://doi.org/10.1006/jema.2000.0351.
[28] Gibbons, S. (2003). Paying for Good Neighbours: Estimating the Value of an Implied Educated Community. Urban Studies, 40(4), 809–833. https://doi.org/10.1080/0042098032000065317.

Pandemic-related gaps in the data mean that some education indicators (i.e. test scores) do not have three consecutive years of complete and reliable data available. In these instances, indicators draw from the three most recent years of available data to create the rolling average.

Math and Reading Proficiency. Elementary school test scores from 3rd and 4th grade are considered in the literature to be strong proxies for the level of resources and opportunity during early childhood both in local schools and more broadly in communities.[29] Indeed, studies have shown that test scores should be understood as an output of students' neighborhood conditions—such as whether they live in a high-poverty or high-crime area—and not only of students' individual abilities and family backgrounds, or the quality of the schools they attend.[30][31]Further, test scores and other measures of school quality are highly correlated with upward mobility for low-income children.[32] Proficiency on elementary school-age standardized tests is also a strong predictor of whether individual children will eventually graduate high school,[33] which itself is associated with higher long-term earnings and other social benefits compared to dropping out.[34]

"Proficiency" is defined as the percentage of students that are performing at grade-level in the 4th grade in each school. Math and reading proficiency scores are calculated as the enrollment weighted average proficiency level of students at the three closest schools, within the same county, to each census tract's centroid. The average value from three schools is used because the methodology does not account for school assignment boundaries, which are different from census tract boundaries.

This approach does have limitations, including that students will attend only one of the three closest schools, so the quality of the school they attend may differ somewhat from the average score that is calculated in each census tract. In addition, this approach does not account for school district assignment policies due to data limitations. However, the academic literature suggests that low-income students are more likely to attend their neighborhood schools even when they have a choice to go elsewhere,[35] and that choice-based assignment policies can have the effect of worsening school segregation.[36] Further, experts and researchers consulted as part of a review of education indicators and measurements used in the Opportunity Map

[29] See, for example: Reardon, Sean F. 2017. Educational Opportunity in Early and Middle Childhood: Variation by Place and Age. Stanford Center for Education Policy Analysis. Working Paper No. 17-12.
[30] Burdick-Will, J., Ludwig, J., Raudenbush, S. W., Sampson, R. J., Sanbonmatsu, L., & Sharkey, P. (2011). "Converging evidence for neighborhood effects on children's test scores: An experimental, quasi-experimental, and observational comparison." In G.J. Duncan & R.J. Murnane (Eds.) Whither Opportunity: Rising Inequality, Schools, and Children's Life Chances (255- 276). New York: Russell Sage Foundation.
[31] Schwartz, H. (2012). "Housing Policy is School Policy: Economically Integrative Housing Promotes Academic Success in Montgomery County, Maryland," in Khalenberg, R.D. (ed.), The Future of School Integration. New York City: The Century Foundation).
[32] Chetty, R., Friedman, J., Hendren, N., Jones, M., Porter, S. (2018)
[33] Fiester, L. (2013). Early Warning Confirmed: A Research Update on Third-Grade Reading. The Annie E. Casey Foundation. http://www.aecf.org/m/resourcedoc/AECF-EarlyWarningConfirmed-2013.pdf.
[34] Sum, A. et al. (2009). The Consequences of Dropping Out of High School: Joblessness and Jailing for High School Dropouts and the High Cost for Taxpayers. Northeastern University Center for Labor Market Studies. http://www.issuelab.org/resources/14510/14510.pdf.
[35] Vernez, G. et al. (2009). State and Local Implementation of the No Child Left Behind Act: Volume VII -- Title I School Choice and Supplemental Educational Services: Final Report. Santa Monica, CA: RAND Corporation, 2009. https://www.rand.org/pubs/reprints/RP1383.html. Gill, B., et al. (2008). State and Local Implementation of the No Child Left Behind Act: Volume IV -- Title I School Choice and Supplemental Educational Services: Interim Report. Santa Monica, CA: RAND Corporation, 2008. https://www.rand.org/pubs/reprints/RP1332.html.
[36] See, for example: Goldstein, D. (2019, April 25). San Francisco Had an Ambitious Plan to Tackle School Segregation. It Made It Worse. The New York Times. Retrieved from https://www.nytimes.com/2019/04/25/us/san-francisco-school-segregation.html.

expressed that it was not essential to account for assignment boundaries, and that using data from either the closest school or the three closest schools would serve as an accurate proxy for attendance.

High School Graduation Rate. Low graduation rates indicate that schools are not preparing students for the workforce. Students who do not graduate from high school face a variety of challenges later in life, including an increased risk of going to prison and lower wages than their classmates who graduate.[37,38] In addition, high schools with lower graduation rates have also been found to have disciplinary practices that negatively impact low-income and minority youth as well as lower levels of teacher engagement.[39]

The high school graduation rate indicator is calculated based on the cohort-weighted average of the three high schools nearest to the tract or rural block group centroid, using California Department of Education data on the percent of students who graduate in four years.[40]

Student Poverty. Studies have consistently shown that attending low-poverty and economically integrated schools boosts educational achievement for low-income students, when compared to attending higher poverty schools.[41] Recent research has concluded that the disparity in school poverty rates that Black and white children experience is the primary mechanism through which racial segregation in schools translates to Black-white academic achievement gaps.[4243]

To the extent that accounting for student poverty also to some extent accounts for race and ethnicity due to their historical and ongoing links, , racial integration in schools provides benefits for low-income students and students of color that both overlap and complement the benefits of economic integration in the classroom—including higher levels of educational attainment, reductions in prejudice and negative attitudes across racial groups, and long-term improvements in earnings, health, and rates of incarceration—all while producing no detrimental effects for white children.[44]

As with the math and reading proficiency indicators, student poverty is calculated by averaging the attribute, weighted by school enrollment, from the three closest schools to the population-weighted centroid of each census tract or rural block group. And similar to the poverty indicator, school poverty rates are measured as the percentage of students that do not receive free and reduced-price lunch, to better align with the opportunity-oriented constructions of the other variables.

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[37] 1 Martin, E. J., Tobin, T. J., & Sugai, G. M. (2003). Current Information on Dropout Prevention: Ideas From Practitioners and the Literature. Preventing School Failure: Alternative Education for Children and Youth, 47(1), 10–17. https://doi.org/10.1080/10459880309604423.
[38] Campbell, L. (2004). As Strong as the Weakest Link: Urban High School Dropout. High School Journal, 87(2), 16–24.
[39] Christle, C. A., Jolivette, K., & Nelson, C. M. (2007). School Characteristics Related to High School Dropout Rates. Remedial and Special Education, 28(6), 325–339. https://doi.org/10.1177/07419325070280060201.
[40] Other graduation indicators exist, such as the percent of 12th graders who graduate within one academic year, but this indicator obscures whether students are repeating grades or dropping out during the first three years of high school.
[41] Ayscue, J., Frankenberg, E., & Siegel-Hawley, G. (2017). Research Brief: The Complementary Benefits of Racial and Socioeconomic Diversity in Schools. The National Coalition on School Diversity: Brief No. 10. http://schooldiversity.org/pdf/DiversityResearchBriefNo10.pdf.
[42] Reardon, S.F., et al. (2019). Is Separate Still Unequal? New Evidence on School Segregation and Racial Academic Achievement Gaps. Stanford Center for Education Policy Analysis Working Paper No. 19-06.
[43] Reardon, S. F. (2016). School Segregation and Racial Academic Achievement Gaps. The Russell Sage Foundation Journal of the Social Sciences, 2(5), 34-57.
[44] Ayscue, J., Frankenberg, E., & Siegel-Hawley, G. (2017).

Environmental

Environmental Burden. Local environmental burden adversely affects community-level opportunity. A long history of research on environmental justice has made clear that environmental and health hazards have tended to accumulate in, and continue to disproportionately impact, low-income communities and communities of color which, for a variety of reasons, show higher levels of vulnerability to these hazards.[45] Environmental hazard data are included in the Opportunity Map in order to identify geographies with high environmental burden and disincentivize new affordable housing development in these areas.

The environmental burden indicator relies on a composite of four indicators that are used in the California Office of Environmental Health Hazard Assessment (OEHHA)'s CalEnviroScreen 4.0 tool (CES) under the "environmental effects" subcomponent of the "pollution burden" domain of CES. These indicators - solid waste sites, groundwater threats, cleanup sites, and hazardous waste facilities - measure the presence and concentration of localized sources of pollution; the indicators are built from data that account for both the number of point sources of pollution within a census tract as well as the distance of a pollution source from populated census blocks within that tract.[46] While other environmental hazard data remain available via CES, they are no longer included in the Opportunity Map either because they are not measured at a scale that is relevant for differentiating conditions at a census tract level or because they include features that complicate their interpretation.

The environmental burden indicator scores work differently than the economic and education indicators. Instead of being used individually, the CES indicator scores for solid waste sites, groundwater threats, cleanup sites, and hazardous waste facilities are averaged for each census tract. The scores are averaged to mirror CES's method of accounting for the cumulative environmental burden that arises when people and places are simultaneously exposed to multiple contaminants from multiple sources. Once averaged, the top 5% of tracts regionally are flagged to identify the places with the highest potential to expose vulnerable populations to nearby health and safety threats.[47] The flagged geographies receive a one point deduction in their opportunity score, which operationalizes the concept that local environmental burden can be a drag on community-level opportunity.

Functionally, opportunity is defined by the eight economic and educational indicators, and the environmental burden indicator only affects overall scores when environmental burden is most severe. This protocol reflects a degree of caution in using CES's environmental effects data. While the data are good proxies for measuring the concentration of nearby environmental hazards, there can be variation within a census tract in terms of how close a proposed

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[45] See, for example, Kreig, E. et al. (2004). Not so Black and White: environmental justice and cumulative impact assessments. Environmental Impact Assessment Review 24(7-8). https://doi.org/10.1016/j.eiar.2004.06.008; Morello-Frosch, R. et al. (2011). Understanding The Cumulative Impacts Of Inequalities In Environmental Health: Implications For Policy. Health Affairs, 30(5). https://doi.org/10.1377/hlthaff.2011.0153; Mohai, P. et al. (2015). Which came first, people or pollution? Assessing the disparate siting and post-siting demographic change hypotheses of environmental injustice. Environmental Research Letters, 10(11). https://doi.org/10.1088/1748-9326/10/11/115008; Chakraborty, J. et al. (2016). Environmental Justice Research: Contemporary Issues and Emerging Topics. Int. J. Environ. Res. Public Health, 13(11). https://doi.org/10.3390/ijerph13111072.

[46] See the CalEnviroScreen 4.0 report for additional details and documentation: https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf

[47] Note that for rural geographies, block group level data are used for economic and educational indicators. However, because CalEnvrioScreen data are not available at the block group level, environmental burden percentile ranks are calculated at the census tract level. The environmental burden percentile rank calculated at the census tract level is assigned to each of the block groups within a given rural census tract.

affordable housing development might be to particular sources of pollution. Also of note is that this map update uses 2020 census tract boundaries, while CalEnviroScreen indicators are currently available only for 2010 census tract boundaries. 2010 CES data had to be transformed to 2020 boundaries; for this version of the methodology, all 2020 census tracts for which at least 80% of the total land area overlaps with a 2010 tract designated as having a high environmental burden is also assigned as having a high environmental burden.[48] This data transformation approach is approximate, and will be used only until OEHHA issues updated environmental data that aligns with 2020 geographies. These limitations mean that the CES data are not a perfect match for the task of generating an exact spatial buffer around a given set of pollution sources. Additionally, CES data do not measure the level of exposure to those hazards or indicate the level and type of risk they might generate. As noted in CES documentation, "risk assessment requires extensive characterization of the chemicals present, the routes and levels of exposure, and the dose-response relationship for hundreds of chemicals for which data are neither currently available nor likely to be generated in the foreseeable future."[49] CES does not aim to tackle this set of complex risk pathways; rather, it is designed to more generally identify those places that are relatively more burdened by compounding pollutants than others. The data use protocol outlined here aims to ensure that CES data only impact opportunity scores for those places where the regional environmental burden is highest.

Finally, since the environmental burden indicator identifies geographies with the top 5% of hazards in each region or rural county, it is only calculated if there are at least 20 tracts within that region or rural county (since the indicator is calculated at the tract level in both urban and rural contexts). In rural counties with fewer than 20 tracts, tracts and the block groups they contain are identified as having high environmental burden if they are in the top 5% of the state.

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[48] The 80% overlap threshold was selected after testing for a cutoff point that includes the majority of 2010 geographies while also ensuring that 2020 tracts are not misclassified as having high environmental burden. Note that this is a custom transformation of CalEnviroScreen data to 2020 geographies for the purpose of this mapping tool.

[49] https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf

High-Poverty & Segregated Area Methodology

A high-poverty and segregated area overlay identifies areas that meet standards for both concentrated poverty (defined as 30% of the population below the federal poverty line) and racial segregation (overrepresentation of people of color relative to the county).

This overlay is intended to be used to support multiple AFFH objectives, including place-based efforts which seek to transform racially and ethnically concentrated areas of poverty into areas of opportunity, as well as policies which seek to replace segregated living patterns with truly integrated and balanced living patterns.

The high-poverty and racial segregation overlay also aligns with the intent of the federal designation of Racially/Ethnically Concentrated Areas of Poverty (RECAPs). However, the federal RECAP standard—which categorizes all areas where more than half the population people of color as areas of racial or ethnic concentration[50] – is not adapted to the racial and ethnic demographics in many parts of California.

Racial segregation has functioned as a powerful mechanism for unequal distribution of resources and access to opportunity by jurisdiction and neighborhood—resulting, over time, in racially segregated neighborhoods with many predominantly Black and Latinx neighborhoods, in particular, characterized by concentrated poverty, higher levels of environmental and social risk, and fewer resources or opportunities for educational and economic advancement.[51] An extensive body of research has documented the harms of racial segregation and concentrated poverty, both independently and in combination—controlling for family background, income, and housing affordability—on children's educational attainment and long-term economic prospects, as well as on the mental and physical health of both children and adults.[52]

The overlay uses a two-stage approach for identifying high-poverty and segregated areas.

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[50] More information on R/ECAPs, including a visualization tool, can be found on the U.S. Department of Housing and Urban Development website: https://egis-hud.opendata.arcgis.com/datasets/320b8ab5d0304daaa7f1b8c03ff01256_0.

[51] For a history of racial segregation in metropolitan America and the creation of segregated areas of concentrated poverty, see, for example: Rothstein, R. (2017). The Color of Law: A Forgotten History of How Our Government Segregated America. Liveright Publishing Corporation

[52] See, for example: Chetty, R., Friedman, J., Hendren, N., Jones, M., Porter, S. (2018); Chetty, R., Hendren, N., & Katz, L.F. (2015); Ayscue, J., Frankenberg, E., & Siegel-Hawley, G. (2017); Johnson, R. (2011). Long-Run Impacts of School Desegregation & School Quality on Adult Attainment. National Bureau of Economic Research. Working Paper 16664; Sanbonmatsu, et al. (2011). Moving to Opportunity for Fair Housing Demonstration Program: Final Impacts Evaluation. Prepared for: U.S. Department of Housing and Urban Development, Office of Policy Development & Research. November; Ludwig, et al. 2011. Neighborhoods, Obesity, and Diabetes—A Randomized Social Experiment. New England Journal of Medicine. 365:1509-1519. October 20; and Kershaw, K. et al. (2017); Association of Changes in Neighborhood-Level Racial Residential Segregation With Changes in Blood Pressure Among Black Adults: The CARDIA Study. JAMA Internal Medicine, 177(7), 996–1002; Krieger, N., Feldman, J. M., Waterman, P. D., Chen, J. T., Coull, B. A., & Hemenway, D. (2017). Local Residential Segregation Matters: Stronger Association of Census Tract Compared to Conventional City-Level Measures with Fatal and Non-Fatal Assaults (Total and Firearm Related), Using the Index of Concentration at the Extremes (ICE) for Racial, Economic, and Racialized Economic Segregation, Massachusetts (US), 1995-2010. Journal of urban health: bulletin of the New York Academy of Medicine, 94(2), 244–258. https://doi.org/10.1007/s11524-016-0116-z; Osypuk, T. L., & Acevedo-Garcia, D. (2010). Beyond individual neighborhoods: a geography of opportunity perspective for understanding racial/ethnic health disparities. Health & place, 16(6), 1113–1123. https://doi.org/10.1016/j.healthplace.2010.07.002; Williams, D. and Collins, C. (2001). Racial Residential Segregation: A Fundamental Cause of Racial Disparities in Health. Public Health Reports. Volume 116. the literature review in Sard, B. & Rice, D. (2016); and the literature review in Menendian, S., Gailes, A. (2019). The Harmful Effects of Segregation (Racial Segregation in the San Francisco Bay Area, Part 4). The Othering & Belonging Institute at UC Berkeley

High-Poverty: First, the overlay identifies tracts and rural block groups where at least 30 percent of the population is living below the poverty line. Research has found that the impact of neighborhood poverty rates in producing negative outcomes for individuals begin to appear after an area exceeds approximately 20 percent poverty, whereupon the externality effects grow rapidly until the neighborhood reaches approximately 40 percent poverty.[53]

Similar to the above 200 percent poverty indicator, college and graduate students are removed from the poverty calculation in the overlay in tracts where they comprise at least 25% of the population, in this case to prevent college towns from distorting the overlay's concentrated poverty measure. An internal analysis found that without this adjustment, some tracts with high proportions of college students—many of which have high opportunity scores—are shown as having poverty rates exceeding 30 percent. The total population living in areas of extreme poverty declined in the 1990s, following government action designed to affirmatively counteract intentionally segregationist public policy.[54] Following national trends, however, concentrated poverty has risen dramatically in California since 2000.[55]

Racial Segregation: Second, the overlay relies on a measure of racial segregation to capture which tracts and rural block groups have a disproportionate share of households of color. Setting an absolute threshold (as the federal RECAP metric does) does not account for substantial variation in the racial and ethnic population across California's counties. To properly account for the features of inequality operating on individuals at the neighborhood level, a relative segregation measure is more appropriate to reflect the experience of residents.[56] The overlay relies on the location quotient of residential racial segregation (LQ), which is increasingly being used in studies that seek to assess the impact of racial segregation on individual and community outcomes[57] and has been used to examine, for example, linkages between residential segregation and public health outcomes.[58] The LQ is a small-area measure of relative segregation calculated at the residential census tract level that represents how much more segregated an area (e.g., a census tract or block group) is relative to the larger area (in this case, the county).[59] For the overlay, tracts that have an LQ higher than 1.25 for Black, Hispanic, Asian, or all people of color are flagged as being racially segregated in comparison to the county.

Census tracts and rural block groups that have both a poverty rate of over 30 percent and that are designated as being racially segregated are identified in the high-poverty and segregated overlay. Due to data unreliability at the block group level in the poverty indicator, "High-Poverty and Segregated" is designated at the tract level in rural areas.

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[53] Galster, George C. (2010). "The Mechanism(s) of Neighborhood Effects: Theory, Evidence, and Policy Implications." Presentation at the ESRC Seminar, St. Andrews University, Scotland, UK, 4–5 February 2010.
[54] Berube, A., & Katz, B. (2005). Katrina's window: Confronting poverty across America. Brookings Institution.
[55] California Housing Partnership Corporation (CHPC) tabulation of data provided in Kneebone, E. and Holmes, N. (2016). U.S. concentrated poverty in the wake of the Great Recession. Brookings. https://www.brookings.edu/research/u-s-concentratedpoverty-in-the-wake-of-the-great-recession/.
[56] Wong, D. W. S. (2002). Modeling Local Segregation: A Spatial Interaction Approach. Geographical and Environmental Modelling, 6(1), 81–97. https://doi.org/10.1080/1361593022012730
[57] Sudano, J. J., Perzynski, A., Wong, D. W., Colabianchi, N., & Litaker, D. (2013). Neighborhood racial residential segregation and changes in health or death among older adults. Health & Place, 19(Supplement C), 80–88. https://doi.org/10.1016/j.healthplace.2012.09.015.
[58] Pruitt, S. L., Lee, S. J. C., Tiro, J. A., Xuan, L., Ruiz, J. M., & Inrig, S. (2015). Residential racial segregation and mortality among black, white, and Hispanic urban breast cancer patients in Texas, 1995 to 2009. Cancer, 121(11), 1845–1855. https://doi.org/10.1002/cncr.29282.
[59] Brown, L. A., & Chung, S.-Y. (2006). Spatial segregation, segregation indices and the geographical perspective. Population, Space and Place, 12(2), 125–143. https://doi.org/10.1002/psp.403.

HCD and CTCAC do not see the AFFH objectives of reducing segregation and promoting integration as conceptually fitting within the context of Tribal lands, which are the territories of sovereign politically entities. For this reason, the High-Poverty & Segregated Area methodology does not apply to Tribal lands, including land held in trust, where at least 25 percent of the geography's land area is within federally recognized Tribal lands as provided by the Census.

See below for the list of measures and data sources for the high-poverty and racial segregation layer.

Measure	Data Source	Table
Poverty: Tracts with at least 30% of the population falling under the federal poverty line	2018-2022 ACS	ACS Table B17020
Racial Segregation: Tracts with a racial/ethnic Location Quotient of higher than 1.25 for Black, Hispanic, Asian, or all people of color in comparison to the county	2018-2022 ACS	ACS Table B03002

AGENDA ITEM 7

Public Comment

AGENDA ITEM 8

Adjournment