CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Project Staff Report
Tax-Exempt Bond Project
December 14, 2016

Sea Wind Apartments, located at 1925 West Greenleaf Avenue in Anaheim, requested and is being recommended for a reservation of $693,288 in annual federal tax credits to finance the acquisition and rehabilitation of 90 units of housing serving tenants with rents affordable to households earning 50-60% of area median income (AMI). The project will be developed by Sea Wind Holdings LLC and is located in Senate District 29 and Assembly District 69.

Sea Wind Apartments is a re-syndication of an existing Low Income Housing Tax Credit (LIHTC) project, Sea Wind Apartments (CA-00-842). See **Special Issues/Other Significant Information** below for additional re-syndication information.

Project Number CA-16-947

Project Name Sea Wind Apartments

Site Address: 1925 West Greenleaf Avenue
Anaheim, CA 92801 County: Orange

Census Tract: 867.020

Tax Credit Amounts	**Federal/Annual**	**State/Total**
Requested:	$693,288	$0
Recommended:	$693,288	$0

Applicant Information

Applicant: Sea Wind 2016 LP
Contact: Chris Burns
Address: 230 Newport Center Drive, Suite 210
Newport Beach, CA 92660
Phone: 949-719-1888 Fax: 949-719-1897
Email: cburns@kdfcommunities.com

General Partner(s) or Principal Owner(s): AHA Orange MGP LLC
Sea Wind Holdings LLC
General Partner Type: Joint Venture
Parent Company(ies): Affordable Housing Access, Inc.
Sea Wind Holdings LLC
Developer: Sea Wind Holdings LLC
Investor/Consultant: WNC & Associates
Management Agent: VPM Management, Inc.

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	8	
Total # of Units:	91	
No. & % of Tax Credit Units:	90	100.00%
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt	
HCD MHP Funding:	No	
55-Year Use/Affordability:	Yes	
Number of Units @ or below 50% of area median income:	16	
Number of Units @ or below 60% of area median income:	74	

Bond Information

Issuer:	Anaheim Housing Authority
Expected Date of Issuance:	January 19, 2017
Credit Enhancement:	N/A

Information

Housing Type:	Non-Targeted
Geographic Area:	Orange County
TCAC Project Analyst:	Zhuo Chen

Unit Mix

21	1-Bedroom Units
46	2-Bedroom Units
24	3-Bedroom Units
91	Total Units

Unit Type & Number		2016 Rents Targeted % of Area Median Income	2016 Rents Actual % of Area Median Income	Proposed Rent (including utilities)
2	1 Bedroom	50%	50%	$914
2	1 Bedroom	60%	53%	$975
9	2 Bedrooms	50%	50%	$1,097
5	3 Bedrooms	50%	48%	$1,218
17	1 Bedroom	60%	60%	$1,097
36	2 Bedrooms	60%	60%	$1,317
19	3 Bedrooms	60%	58%	$1,462
1	2 Bedrooms	Manager’s Unit	Manager’s Unit	$1,411

Project Cost Summary at Application

Land and Acquisition	$16,500,000
Construction Costs	$0
Rehabilitation Costs	$2,928,702
Construction Contingency	$179,833
Relocation	$0
Architectural/Engineering	$33,150
Const. Interest, Perm. Financing	$1,494,710
Legal Fees, Appraisals	$65,000
Reserves	$297,077
Other Costs	$320,372
Developer Fee	$2,657,000
Commercial Costs	$0
Total	**$24,475,844**

Project Financing

Estimated Total Project Cost:	$24,475,844
Estimated Residential Project Cost:	$24,475,844
Estimated Commercial Project Cost:	$0

Residential

Construction Cost Per Square Foot:	$35
Per Unit Cost:	$268,965
True Cash Per Unit Cost*:	$221,493

Construction Financing

Source	Amount
Citibank	$14,000,000
Seller Carryback Loan	$2,373,244
GP Equity	$226,756
Tax Credit Equity	$5,700,609

Permanent Financing

Source	Amount
Citibank	$11,130,000
Seller Carryback Loan	$2,000,000
GP Equity	$226,756
Net Operating Income	$1,102,949
Deferred Developer Fee	$2,319,955
Tax Credit Equity	$7,696,184
TOTAL	**$24,475,844**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$4,610,010
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	$15,734,450
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$5,993,013
Qualified Basis (Acquisition):	$15,734,450
Applicable Rate:	3.25%
Maximum Annual Federal Credit, Rehabilitation:	$181,918
Maximum Annual Federal Credit, Acquisition:	$511,370
Total Maximum Annual Federal Credit:	$693,288
Approved Developer Fee in Project Cost:	$2,657,000
Approved Developer Fee in Eligible Basis:	$2,630,520
Investor/Consultant:	WNC & Associates
Federal Tax Credit Factor:	$1.11010

Per Regulation Section 10322(h)(9)(A), The "as if vacant" land value and the existing improvement value established at application, as well as the eligible basis amount derived from those values, will be used during all subsequent reviews including the placed in service review, for the purpose of determining the final award of Tax Credits.

Per Regulation Section 10327(c)(2)(C), Once established at the initial funded application, the developer fee cannot be increased, but may be decreased, in the event of a modification in basis.

Eligible Basis and Basis Limit

Requested Unadjusted Eligible Basis:	$20,344,460
Actual Eligible Basis:	$20,344,460
Unadjusted Threshold Basis Limit:	$20,482,462
Total Adjusted Threshold Basis Limit:	$23,964,481

Adjustments to Basis Limit

55-Year Use/Affordability Restriction – 1% for Each 1% of Low-Income Units are Income Targeted between 50% AMI & 36% AMI: 17%

Cost Analysis and Line Item Review

Staff analysis of project costs to determine reasonableness found all fees to be within TCAC's underwriting guidelines and TCAC limitations. Annual operating expenses exceed the minimum operating expenses established in the Regulations, and the project pro forma shows a positive cash flow from year one. Staff has calculated federal tax credits based on 3.25% of the qualified basis. Applicants are cautioned to consider the expected federal rate when negotiating with investors. TCAC's financial evaluation at project completion will determine the final allocation.

Special Issues/Other Significant Information

Prior to closing, the applicant or its assignee shall obtain TCAC's consent to assign and assume the existing Regulatory Agreement (CA-00-842). 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. The initial 15 year compliance period is from 01/01/2001 through 12/31/2015. The existing regulatory agreement expires 12/31/2030. The existing regulatory agreement income targeting is 10% of the units at or below 50% AMI. The project shall maintain the rents and income targeting levels in the existing regulatory agreement(s) for the duration of the new regulatory agreement(s).

The project is a re-syndication subject to the hold harmless rent limits. The applicant requested and is approved to underwrite the project at the hold harmless rent limits based on the year in which the existing TCAC projects were originally placed-in-service: Year 2001. The new regulatory agreement shall reflect the current tax credit rent limits, while the project may continue to charge the hold harmless rents for 10% of the units (9 units) at or below 50% AMI, provided that such hold harmless rents do not exceed the tax credit rent limit for 60% AMI, only until such time as the current tax credit rent limits equal or exceed the hold harmless rents.

This project is the resyndication of an existing tax credit project, CA-00-842, which is under a 30-year TCAC extended use agreement. The new reservation of tax credits will result in moderately deeper rent/income targeting than the original award of tax credits by increasing the number of units restricted at 50% AMI from 10% of the units (9 units) to 16 units. The affordable housing restrictions will extend out to approximately year 2070.

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 Replacement Reserve in the amount of $226,756. In lieu of a Short Term Work Capitalized Reserve, there is a general partner equity contribution of $226,756 allowing the applicant to use the Short Term Work Reserve Amount to fund rehabilitation expenses and to receive eligible basis for such amount.

Local Reviewing Agency

The Local Reviewing Agency, the City of Anaheim / Anaheim Housing Authority, has completed a site review of this project and strongly supports this project.

Recommendation

Staff recommends that the Committee make a preliminary reservation of tax credits in the following amount(s) contingent upon standard conditions and any additional conditions imposed by the Committee:

Federal Tax Credits/Annual	State Tax Credits/Total
$693,288	**$0**

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.

The IRS has advised TCAC that the amount of tax-exempt bonds issued, equivalent to at least 50% of aggregate basis, must remain in place through the first year of the credit period or until eligible basis is finally determined.

TCAC 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 TCAC.

The applicant must pay TCAC a reservation fee calculated in accordance with regulation. Additionally, TCAC 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 TCAC limitations. Fees in excess of these limitations will not be considered when determining the amount of credit when the project is placed-in-service.

The applicant/owner shall be subject to underwriting criteria set forth in Section 10327 of the regulations through the final feasibility analysis performed by TCAC 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 TCAC in its final feasibility analysis.

Additional Conditions: None.