

**CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE**  
**Project Staff Report**  
**Tax-Exempt Bond Project**  
**December 11, 2019**

Santa Ana Towers , located at 401 West First Street in Santa Ana, requested and is being recommended for a reservation of \$3,146,480 in annual federal tax credits to finance the acquisition and rehabilitation of 197 units of housing serving seniors with rents affordable to households earning 50%-60% of area median income (AMI). The project will be developed by Thomas Safran & Associates and is located in Senate District 34 and Assembly District 69.

Santa Ana Towers is a re-syndication of an existing Low Income Housing Tax Credit (LIHTC) project, Santa Ana Towers (CA-2000-857). 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.

**Project Number** CA-19-572

**Project Name** Santa Ana Towers  
 Site Address: 401 West First Street  
 Santa Ana, CA 92701 County: Orange  
 Census Tract: 750.02

<b>Tax Credit Amounts</b>	<b>Federal/Annual</b>	<b>State/Total</b>
Requested:	\$3,146,480	\$0
Recommended:	\$3,146,480	\$0

**Applicant Information**

Applicant: Santa Ana Housing, L.P  
 Contact: Anthony Yannatta  
 Address: 11812 San Vicente Blvd., Ste 600  
 Los Angeles, CA 90049  
 Phone: 310-820-4888  
 Email: anthony@tsahousing.com

General Partner(s) or Principal Owner(s): Santa Ana Housing, LLC  
 Housing Corporation of America  
 General Partner Type: Joint Venture  
 Parent Company(ies): Thomas Safran & Associates  
 Housing Corporation of America  
 Developer: Thomas Safran & Associates  
 Investor/Consultant: Wells Fargo Bank  
 Management Agent: Thomas Safran & Associates, Inc.

**Project Information**

Construction Type: Acquisition & Rehabilitation  
 Total # Residential Buildings: 1  
 Total # of Units: 199  
 No. / % of Low Income Units: 197 100.00%  
 Federal Set-Aside Elected: 40%/60%  
 Federal Subsidy: Tax-Exempt / HUD Section 8 Project-based Vouchers  
 (197 Units - 100%)

**Bond Information**

Issuer: CalHFA  
 Expected Date of Issuance: 12/16/2019

**Information**

Housing Type: Seniors  
 Geographic Area: Orange County  
 TCAC Project Analyst: Carmen Doonan

**55-Year Use / Affordability**

<u>Aggregate Targeting Number of Units</u>	<u>Percentage of Affordable Units</u>
50% AMI: 113	57%
60% AMI: 84	43%

**Unit Mix**

<u>199 1-Bedroom Units</u>		<u>199 Total Units</u>	
<u>Unit Type &amp; Number</u>	<u>2019 Rents Targeted % of Area Median Income</u>	<u>2019 Rents Actual % of Area Median Income</u>	<u>Proposed Rent (including utilities)</u>
70 1 Bedroom	60%	60%	\$1,336
90 1 Bedroom	50%	50%	\$1,113
14 1 Bedroom	60%	60%	\$1,336
23 1 Bedroom	50%	50%	\$1,113
1 1 Bedroom	Manager's Unit	Manager's Unit	\$0
1 1 Bedroom	Manager's Unit	Manager's Unit	\$0

**Project Cost Summary at Application**

Land and Acquisition	\$62,017,541
Construction Costs	\$0
Rehabilitation Costs	\$15,685,076
Construction Hard Cost Contingency	\$2,352,761
Soft Cost Contingency	\$664,840
Relocation	\$398,000
Architectural/Engineering	\$440,000
Const. Interest, Perm. Financing	\$3,547,246
Legal Fees	\$248,000
Reserves	\$904,735
Other Costs	\$753,423
Developer Fee	\$11,487,136
Commercial Costs	\$0
<b>Total</b>	<b>\$98,498,758</b>

**Residential**

Construction Cost Per Square Foot:	\$128
Per Unit Cost:	\$494,969
True Cash Per Unit Cost*:	\$371,174

**Construction Financing**

Source	Amount
Chase - Series A	\$37,383,000
Chase	\$5,076,200
Seller Carryback	\$16,617,000
Operating Income	\$1,216,209
Existing Reserves	\$217,541
Deferred Costs	\$8,410,272
Seller Credit	\$1,008,135
Tax Credit Equity	\$28,570,401

**Permanent Financing**

Source	Amount
Chase	\$42,459,200
Seller Carryback	\$16,617,000
Operating Income	\$1,258,381
Existing Reserves	\$217,541
Seller Credit	\$1,008,135
Deferred Developer Fee	\$8,018,100
Tax Credit Equity	\$28,920,401
<b>TOTAL</b>	<b>\$98,498,758</b>

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

**Determination of Credit Amount(s)**

Requested Eligible Basis (Rehabilitation):	\$24,266,098
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	\$63,801,947
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	\$31,545,928
Qualified Basis (Acquisition):	\$63,801,947
Applicable Rate:	3.30%
Maximum Annual Federal Credit, Rehabilitation:	\$1,041,016
Maximum Annual Federal Credit, Acquisition:	\$2,105,464
Total Maximum Annual Federal Credit:	\$3,146,480
Approved Developer Fee (in Project Cost & Eligible Basis):	\$11,487,136
Investor/Consultant:	Wells Fargo Bank
Federal Tax Credit Factor:	\$0.91914

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.

**Eligible Basis and Basis Limit**

Requested Unadjusted Eligible Basis:	\$88,068,045
Actual Eligible Basis:	\$88,068,045
Unadjusted Threshold Basis Limit:	\$54,506,498
Total Adjusted Threshold Basis Limit:	\$91,025,852

**Adjustments to Basis Limit**

95% of Upper Floor Units are Elevator-Serviced  
 55-Year Use/Affordability Restriction – 1% for Each 1% of Low-Income and Market Rate Units are  
 Income Targeted between 50% AMI & 36% AMI: 57%

**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 meet or 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 3.30% 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.

**Significant Information / Additional Conditions**

The proposed rents do not include any utility allowance. The owner will pay for all utilities.

The original regulatory agreement (CA-2000-857) provided for 1 manager unit for 198 units. The project requested and was granted the approval of one additional exempt manager unit, for a total of two exempt manager units.

**Resyndication and Resyndication Transfer Event**

Prior to closing, the applicant or its assignee shall obtain TCAC's consent to assign and assume the existing Regulatory Agreement (CA-2000-857). 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-00-857) is a qualified low-income household for the subsequent allocation (existing household eligibility is "grandfathered").

The project is a resyndication occurring concurrently with a Transfer Event with distribution of Net Project Equity. The rehabilitation scope of work shall include all of the Short Term Work in the amount of \$1,008,135. There is a credit from the seller of at least \$1,008,135, allowing the applicant to receive eligible basis for the entire Short Term Work 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.

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.

**CDLAC Additional Conditions**

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