

**CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE**  
**CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE**  
**Project Staff Report**  
**Qualified Private Activity Tax-Exempt Bond Project**  
**April 8, 2025**

The project, 34th & San Pablo Family Housing, located at 3419-3431 San Pablo Ave in Oakland on a 0.35 acre site, requested and is being recommended for a reservation of \$2,591,806 in annual federal tax credits and \$26,824,862 of tax-exempt bond cap to finance the new construction of 60 units of housing, consisting of 59 restricted rental units and 1 unrestricted manager's unit. The project will have 10 studio units, 35 one-bedroom units, and 15 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 September 2025 and be completed in September 2027. The project will be developed by East Bay Asian Local Development Corporation and will be located in Senate District 9 and Assembly District 18.

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 Community Care Expansion (CCE) program of the California Department of Social Services.

<b>Project Number</b>	CA-25-455
<b>Project Name</b>	34th & San Pablo Family Housing
Site Address:	3419-3431 San Pablo Ave Oakland, CA 94608
County:	Alameda
Census Tract:	4015.00

<b>Tax Credit Amounts</b>	<b>Federal/Annual</b>	<b>State/Total</b>
Requested:	\$2,591,806	\$0
Recommended:	\$2,591,806	\$0

<b>Tax-Exempt Bond Allocation</b>	
Recommended:	\$26,824,862

<b>CTCAC Applicant Information</b>	
CTCAC Applicant/CDLAC Sponsor:	34SP Development, L.P.
Contact:	Janelle Chan
Address:	1825 San Pablo Avenue, Suite 200 Oakland, CA 94612
Phone:	408-242-7959
Email:	jchan@ebaldc.org

<b>Bond Financing Information</b>	
CDLAC Applicant/Bond Issuer:	California Municipal Finance Authority
Bond Counsel:	Anzel Galvan LLP
Private Placement Purchaser:	Citi Community Capital

<b>Development Team</b>	
General Partner / Principal Owner:	34SP Manager LLC
General Partner Type:	Nonprofit
Parent Company:	East Bay Asian Local Development Corporation
Developer:	East Bay Asian Local Development Corporation
Investor/Consultant:	California Housing Partnership
Management Agent:	East Bay Asian Local Development Corporation

**Project Information**

Construction Type:	New Construction
Total # Residential Buildings:	1
Total # of Units:	60
No. / % of Low Income Units:	59 100.00%
Average Targeted Affordability:	39.83%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / National Housing Trust Fund (NHTF)

**Information**

Housing Type:	Special Needs
	At least 20% 1-bedroom units & 10% >1-bedroom units
% of Special Need Units:	30 units 51%
Geographic Area:	Bay Area Region
State Ceiling Pool:	New Construction
Set Aside:	Extremely Low/Very Low Income Set Aside
CDLAC Project Analyst:	Amit Sarang
CTCAC Project Analyst:	Gloria Witherow

**55-Year Use / Affordability**

<b>Aggregate Targeting</b>	<b>Number of Units</b>	<b>Percentage of Affordable Units</b>
30% AMI:	30	51%
50% AMI:	29	49%

**Unit Mix**

10	SRO/Studio Units
35	1-Bedroom Units
15	2-Bedroom Units
60	Total Units

<b>Unit Type &amp; Number</b>	<b>2024 Rents Targeted % of Area Median Income</b>	<b>Proposed Rent (including utilities)</b>
7 SRO/Studio	30%	\$817
10 1 Bedroom	30%	\$876
8 2 Bedrooms	30%	\$1,051
1 SRO/Studio	30%	\$357
4 1 Bedroom	30%	\$513
2 SRO/Studio	50%	\$1,363
20 1 Bedroom	50%	\$1,459
7 2 Bedrooms	50%	\$1,752
1 1 Bedroom	Manager's Unit	\$0

**Project Cost Summary at Application**

Land and Acquisition	\$3,817,111
Construction Costs	\$31,490,391
Rehabilitation Costs	\$0
Construction Hard Cost Contingency	\$1,691,174
Soft Cost Contingency	\$647,524
Relocation	\$0
Architectural/Engineering	\$2,360,972
Const. Interest, Perm. Financing	\$5,850,415
Legal Fees	\$244,066
Reserves	\$364,607
Other Costs	\$5,179,001
Developer Fee	\$3,500,000
Commercial Costs	\$155,948
<b>Total</b>	<b>\$55,301,209</b>

**Residential**

Construction Cost Per Square Foot:	\$565
Per Unit Cost:	\$918,865
Estimated Hard Per Unit Cost:	\$459,347
True Cash Per Unit Cost*:	\$902,250
Bond Allocation Per Unit:	\$447,081
Bond Allocation Per Restricted Rental Unit:	\$454,659

**Construction Financing**

Source	Amount
Citi Bank: Tax-Exempt	\$26,824,862
HCD: NHTF	\$15,026,144
City of Oakland (CO)	\$3,426,811
CO: Accrued Interest	\$151,179
General Partner Loan: CCE	\$5,193,750
Deferred Cost	\$1,661,607
Deferred Developer Fee	\$1,000,000
Tax Credit Equity	\$2,016,856

**Permanent Financing**

Source	Amount
Citi Bank: Tax-Exempt	\$1,382,000
HCD: NHTF	\$16,695,716
City of Oakland (CO)	\$7,000,000
CO: Accrued Interest	\$151,179
CO: Supplemental Tranche	\$2,000,000
General Partner Loan: CCE	\$5,193,750
Deferred Developer Fee	\$1,000,000
Tax Credit Equity	\$21,878,564
<b>TOTAL</b>	<b>\$55,301,209</b>

\*Less Donated Land, Seller Carryback Loans, Waived Fees, and Deferred Developer Fee

**Determination of Credit Amount(s)**

Requested Eligible Basis:	\$49,842,428
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	\$64,795,156
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	\$2,591,806
Approved Developer Fee in Project Cost:	\$3,500,000
Approved Developer Fee in Eligible Basis:	\$3,486,668
Federal Tax Credit Factor:	\$0.84414

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 \$902,250. The applicant noted that the per unit cost is attributed to inflation, prevailing wage costs, high cost of multiple key materials, interest rates, and construction costs.

**CDLAC Analyst Comments:** None.

**Resyndication and Resyndication Transfer Event:** None.

### **Standard Conditions**

The applicant 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
<b>Total Points</b>	120	110	119

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

**Tie Breaker:** 110.488%