

**CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE**

**Project Staff Report  
2025 Waiting List Project  
September 30, 2025**

Imperial Beach Neighborhood Center Apartments, located at 455 Palm Avenue in Imperial Beach, requested \$2,500,000 in annual federal tax credits and \$2,784,068 in total state tax credits but is being recommended for \$2,759,634 in annual federal tax credits to finance the new construction of 49 units of housing serving seniors and special needs tenants with rents affordable to households earning 15%-60% of area median income (AMI). Prior to reservation, \$2,784,068 in total state tax credits was exchanged for federal tax credits pursuant to CTCAC Regulation Sections 10315(g), 10317(c), and 10327(d)(3). The project will be developed by Wakeland Housing and Development Corporation and will be located in Senate District 18 and Assembly District 80.

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 Permanent Local Housing Allocation (PLHA) programs of HCD.

**Project Number** CA-25-125

**Project Name** Imperial Beach Neighborhood Center Apartments

Site Address: 455 Palm Avenue  
Imperial Beach, CA 91932

County: San Diego

Census Tract: 0102.02

<b>Tax Credit Amounts</b>	<b>Federal/Annual</b>	<b>State/Total *</b>
Requested:	\$2,500,000	\$2,784,068
Recommended:	\$2,759,634 **	\$0 **

\*\* Federal and State Credit revised pursuant to CTCAC Regulation Sections 10315(g), 10317(c), and 10327(d)(3)

**Applicant Information**

Applicant: Wakeland Housing and Development Corporation

Applicant for State Credits: Wakeland IBNCA LLC

Contact: John Sugden

Address: 1230 Columbia Street, Suite 950  
San Diego, CA 92101

Phone: 619.326.6212

Email: jsugden@wakelandhdc.com

General Partners / Principal Owners: Wakeland IBNCA LLC  
Wakeland Housing and Development Corporation

General Partner Type: Nonprofit

Parent Companies: Wakeland Housing and Development Corporation  
Wakeland Housing and Development Corporation

Developer: Wakeland Housing and Development Corporation

Investor/Consultant: California Housing Partnership

Management Agent: ConAm Property Management Co

**Project Information**

Construction Type: New Construction  
 Total # Residential Buildings: 1  
 Total # of Units: 50  
 No. & % of Tax Credit Units: 49 100%  
 Federal Set-Aside Elected: 40%/60%  
 Federal Subsidy: HOME / HUD Section 8 Project-based Vouchers (25 Units - 50%)

**Information**

Set-Aside: N/A  
 Housing Type: Special Needs Seniors  
 Type of Special Needs: Homeless  
 Average Targeted Affordability of Special Needs Project Units: 25.20%  
 % of Special Need Units: 25 units 51.02%  
 Geographic Area: San Diego County  
 CTCAC Project Analyst: Cynthia Compton

**55-Year Use / Affordability**

<u>Aggregate Targeting</u>	<u>Number of Units</u>	<u>Percent of Required Affordable Units</u>
At or Below 20% AMI:	8	15%
At or Below 30% AMI:	17	30%
At or Below 60% AMI:	24	45%

**Unit Mix**

40	SRO/Studio Units
9	1-Bedroom Units
1	3-Bedroom Units
<u>50</u>	<u>Total Units</u>

<u>Unit Type &amp; Number</u>	<u>2025 Rents Targeted % of Area Median Income</u>	<u>Proposed Rent (including utilities)</u>
2 SRO/Studio	15%	\$434
1 1 Bedroom	15%	\$465
4 SRO/Studio	20%	\$579
1 1 Bedroom	20%	\$620
4 SRO/Studio	25%	\$724
1 1 Bedroom	25%	\$775
10 SRO/Studio	30%	\$868
2 1 Bedroom	30%	\$930
20 SRO/Studio	60%	\$1,737
4 1 Bedroom	60%	\$1,860
1 3 Bedrooms	Manager's Unit	\$0

**Project Cost Summary at Application**

Land and Acquisition	\$2,585,000
Construction Costs	\$23,117,363
Rehabilitation Costs	\$0
Construction Contingency	\$1,363,972
Relocation	\$74,000
Architectural/Engineering	\$1,115,000
Const. Interest, Perm. Financing	\$3,589,274
Legal Fees	\$205,000
Reserves	\$518,367
Other Costs	\$1,792,082
Developer Fee	\$2,800,000
Commercial Costs	\$0
<b>Total</b>	<b>\$37,160,058</b>

**Residential**

Construction Cost Per Square Foot:	\$722
Per Unit Cost:	\$743,201
True Cash Per Unit Cost*:	\$743,201

**Construction Financing**

<u>Source</u>	<u>Amount</u>
Wells Fargo	\$25,127,674
County of San Diego: NPLH	\$2,721,199
County of San Diego: PLHA	\$1,990,768
County of San Diego: HOME	\$760,000
City of Imperial Beach	\$625,000
City of Imperial Beach: Deferred Fees	\$105,582
Deferred Costs	\$2,238,367
Tax Credit Equity	\$3,591,468

**Permanent Financing**

<u>Source</u>	<u>Amount</u>
CCRC	\$5,241,000
County of San Diego: NPLH	\$3,023,554
County of San Diego: PLHA	\$2,211,965
County of San Diego: HOME	\$800,000
City of Imperial Beach (CIB)	\$625,000
CIB: Deferred Fees	\$105,582
Tax Credit Equity	\$25,152,957
<b>TOTAL</b>	<b>\$37,160,058</b>

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

**Determination of Credit Amount(s)**

Requested Eligible Basis:	\$21,367,518
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	\$27,777,773
Applicable Rate:	9.00%
Total Maximum Annual Federal Credit:	\$2,759,634
Approved Developer Fee (in Project Cost & Eligible Basis):	\$2,800,000
Federal Tax Credit Factor:	\$0.91146
State Tax Credit Factor:	\$0.85000

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, shall not increase during all subsequent reviews including the placed in service review, for the purpose of determining the final award of Tax Credits, unless a waiver has been granted for a purchase price not to exceed the sum of third party debt that will be assumed or paid off. The sum of the third party debt encumbering the property may increase during subsequent reviews to reflect the actual amount.

**Tie-Breaker Information**

First:	<b>Special Needs</b>
Self-Score Final:	<b>65.124%</b>
CTCAC Final:	<b>48.110%</b>

**Significant Information / Additional Conditions**

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

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

**Local Reviewing Agency**

The Local Reviewing Agency, City of Imperial Beach, has completed a site review of this project and strongly supports this project.

**Standard Conditions**

The applicant must submit all documentation required for a Carryover Allocation and any Readiness to Proceed Requirements elected. Failure to provide the documentation at the time required may result in rescission of the Credit reservation and cancellation of a carryover allocation.

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 performance deposit and allocation 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.

The applicant must ensure the project meets all Additional Threshold Requirements of the proposed project. If points were awarded for service amenities, the applicant will be required to provide such amenity or amenities identified in the application, for a minimum period of fifteen years and at no cost to the tenants. Applicants that received increases (exceptions to limits) in the threshold basis limit under Section 10327(c)(5) must submit the certification required by Section 10322(i)(2) at project completion.

<b>Points System</b>	<b>Max. Possible Points</b>	<b>Requested Points</b>	<b>Points Awarded</b>
<b>Owner / Management Characteristics</b>	<b>10</b>	<b>10</b>	<b>10</b>
General Partner Experience	7	7	7
Management Experience	3	3	3
<b>Housing Needs</b>	<b>10</b>	<b>10</b>	<b>10</b>
<b>Site Amenities</b>	<b>15</b>	<b>15</b>	<b>15</b>
Within 1/3 mile of transit, service every 30 min, 25 units/acre density	7	7	7
Within 1/2 mile of public park or community center open to general public	3	3	3
Within 1 mile of public library	2	2	2
Within 1/2 mile of a neighborhood market of at least 5,000 sf	3	3	3
Within 1/2 mile of a pharmacy	2	2	2
<b>Service Amenities</b>	<b>10</b>	<b>10</b>	<b>10</b>
<b>LARGE FAMILY, SENIOR, AT-RISK HOUSING TYPES</b>			
Service Coordinator, minimum ratio of 1 FTE to 600 bedrooms	5	5	5
Adult ed/health & wellness/skill bldg classes, min. 60 hrs/yr instruction	5	5	5
Service Coordinator/Other Services Specialist, min. ratio 1 FTE to 360 bdrms	5	5	5
Adult ed/health & wellness/skill bldg classes, min. 84 hrs/yr instruction	5	5	5
<b>Lowest Income</b>	<b>52</b>	<b>52</b>	<b>52</b>
Basic Targeting	50	50	50
Deeper Targeting – at least 10% of Low Income Units @ 30% AMI or less	2	2	2
<b>Readiness to Proceed</b>	<b>10</b>	<b>10</b>	<b>10</b>
<b>Miscellaneous Federal and State Policies</b>	<b>2</b>	<b>2</b>	<b>2</b>
State Credit Substitution	2	2	2
<b>Total Points</b>	<b>109</b>	<b>109</b>	<b>109</b>

**Please Note: If more than the maximum Site Amenity points were requested, not all amenities may have been scored and/or verified.**

**DO NOT RELY ON SCORING IN THIS COMPETITIVE CYCLE FOR FUTURE APPLICATIONS. ALL REAPPLICATIONS ARE REVIEWED WITHOUT RELIANCE ON PAST SCORING.**