

**CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE
 CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
 Project Staff Report
 Qualified Private Activity Tax-Exempt Bond Project
 December 10, 2025**

Fox Courts, located at 555 19th Street in Oakland on a 0.88 acre site, requested and is being recommended for a reservation of \$1,449,573 in annual federal tax credits and \$10,995,836 of tax-exempt bond cap to finance the acquisition & rehabilitation of 80 units of housing, consisting of 79 restricted rental units and 1 unrestricted manager's unit. The project has 18 studio units, 9 one-bedroom units, 13 two-bedroom units, 35 three-bedroom units, and 5 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 2026 and be completed in December 2027. The project will be developed by Resources for Community Development and is located in Senate District 9 and Assembly District 14.

Fox Courts is a resyndication of an existing Low Income Housing Tax Credit (LIHTC) project, Fox Courts (CA-2007-833). 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. The project financing includes state funding from the Multifamily Housing Program (MHP) of HCD.

Project Number CA-25-707

Project Name Fox Courts
 Site Address: 555 19th Street
 Oakland, CA 94612
 County: Alameda
 Census Tract: 4029.00

Tax Credit Amounts	Federal/Annual	State/Total
Requested:	\$1,449,573	\$0
Recommended:	\$1,449,573	\$0

Tax-Exempt Bond Allocation
 Recommended: \$10,995,836

CTCAC Applicant Information
 CTCAC Applicant/CDLAC Sponsor: Fox Recap, L.P.
 Contact: Florence Hsueh
 Address: 2220 Oxford Street
 Berkeley, CA 94704
 Phone: 510-841-4410
 Email: fhsueh@rcdhousing.org

Bond Financing Information
 CDLAC Applicant/Bond Issuer: California Municipal Finance Authority (CMFA)
 Bond Counsel: Jones Hall, A Professional Law Corporation
 Private Placement Purchaser: JP Morgan Chase Bank, N. A.

Development Team

General Partner / Principal Owner:	RCD GP II LLC
General Partner Type:	Nonprofit
Parent Company:	Resources for Community Development
Developer:	Resources for Community Development
Investor/Consultant:	Community Economics, Inc.
Management Agent:	The John Stewart Company (JSCo)

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	1	
Total # of Units:	80	
No. / % of Low Income Units:	79	100.00%
Average Targeted Affordability:	43.42%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (33 Units - 41%)	

Information

Housing Type:	Non-Targeted
Geographic Area:	Bay Area Region
CDLAC Project Analyst:	Sarah Lester
CTCAC Project Analyst:	Ruben Barcelo

55-Year Use / Affordability

<u>Aggregate Targeting</u>	<u>Number of Units</u>	<u>Percentage of Affordable Units</u>
30% AMI:	8	10%
35% AMI:	34	43%
40% AMI:	5	6%
50% AMI:	6	8%
55% AMI:	12	15%
60% AMI:	14	18%

Unit Mix

18	SRO/Studio Units
9	1-Bedroom Units
13	2-Bedroom Units
35	3-Bedroom Units
5	4-Bedroom Units
80	Total Units

Unit Type & Number	2025 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
1 SRO/Studio	30%	\$312
2 SRO/Studio	30%	\$839
2 SRO/Studio	30%	\$839
7 SRO/Studio	35%	\$801
1 SRO/Studio	35%	\$979
1 SRO/Studio	40%	\$1,119
3 SRO/Studio	40%	\$877
1 SRO/Studio	40%	\$877
1 1 Bedroom	30%	\$335
1 1 Bedroom	30%	\$899
2 1 Bedroom	35%	\$1,049
2 1 Bedroom	50%	\$1,498
1 1 Bedroom	55%	\$1,473
1 1 Bedroom	60%	\$1,256
1 1 Bedroom	60%	\$1,798
1 2 Bedrooms	30%	\$1,079
2 2 Bedrooms	35%	\$903
1 2 Bedrooms	35%	\$1,259
1 2 Bedrooms	35%	\$1,259
1 2 Bedrooms	50%	\$1,257
1 2 Bedrooms	50%	\$1,798
2 2 Bedrooms	60%	\$1,204
3 2 Bedrooms	60%	\$2,158
17 3 Bedrooms	35%	\$1,454
3 3 Bedrooms	55%	\$1,587
4 3 Bedrooms	55%	\$2,285
4 3 Bedrooms	55%	\$2,285
7 3 Bedrooms	60%	\$1,931
3 4 Bedrooms	35%	\$1,622
1 4 Bedrooms	50%	\$1,798
1 4 Bedrooms	50%	\$2,317
1 2 Bedrooms	Manager's Unit	\$0

Project Cost Summary at Application

Land and Acquisition	\$18,099,800
Construction Costs	\$0
Rehabilitation Costs	\$8,607,606
Construction Hard Cost Contingency	\$1,681,321
Soft Cost Contingency	\$1,097,205
Relocation	\$345,000
Architectural/Engineering	\$768,407
Const. Interest, Perm. Financing	\$3,193,440
Legal Fees	\$150,000
Reserves	\$902,089
Other Costs	\$354,796
Developer Fee	\$3,195,883
Commercial Costs	\$0
Total	\$38,395,547

Residential

Construction Cost Per Square Foot:	\$83
Per Unit Cost:	\$479,944
Estimated Hard Per Unit Cost:	\$93,687
True Cash Per Unit Cost*:	\$421,186
Bond Allocation Per Unit:	\$137,448
Bond Allocation Per Restricted Rental Unit:	\$139,188

Construction Financing		Permanent Financing	
Source	Amount	Source	Amount
Chase: Tax-Exempt	\$10,995,836	Chase: Tax-Exempt	\$2,966,700
Chase: Taxable	\$3,962,346	Seller Carryback	\$2,504,815
Seller Carryback	\$2,504,815	Affordable Housing Program	\$2,000,000
HCD: MHP	\$7,768,307	HCD: MHP	\$7,768,307
Alameda County	\$700,000	Alameda County	\$700,000
City of Oakland	\$5,161,570	City of Oakland	\$5,161,570
Acquired Reserves	\$1,138,893	Net Operating Income	\$300,000
Accrued Interest	\$1,183,298	Acquired Reserves	\$1,138,893
General Partner Equity	\$301,000	Accrued Interest	\$1,183,298
Tax Credit Equity	\$1,246,508	Deferred Developer Fee	\$2,195,883
		General Partner Equity	\$301,000
		Tax Credit Equity	\$12,175,081
		TOTAL	\$38,395,547

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	\$17,752,671
130% High Cost Adjustment:	No
Requested Eligible Basis (Acquisition):	\$18,486,663
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	\$17,752,671
Qualified Basis (Acquisition):	\$18,486,663
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	\$710,106
Maximum Annual Federal Credit, Acquisition:	\$739,467
Total Maximum Annual Federal Credit:	\$1,449,573
Approved Developer Fee (in Project Cost & Eligible Basis):	\$3,195,883
Federal Tax Credit Factor:	\$0.83991

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 received CTCAC approval to replace services committed in the CTCAC regulatory agreement with a commitment to provide a service coordinator and adult education (60 hours per year), in addition to providing high-speed internet service in each low-income unit free of charge.

The project's pro forma shows cash flow after debt service exceeding limits established by CTCAC Regulations. Pursuant to CTCAC Regulations Section 10327(g), the overage of cash flow is within the \$25,000 limit allowed by Committee. The applicant must correct the cash flow overage in the Placed in Service submission.

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-07-833). 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-07-833) 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 resyndication 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

The applicant shall issue bonds within time limits specified by CDLAC.

The applicant anticipates financing more than 25% 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	0
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: 316.024%