

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

Ephesian Legacy Court, located at 1708 Harmon Street in Berkeley on a 1.05 acre site, requested and is being recommended for a reservation of \$2,414,508 in annual federal tax credits, \$4,766,775 in total state tax credits, and \$20,436,012 of tax-exempt bond cap to finance the new construction of 80 units of housing, consisting of 79 restricted rental units and 1 unrestricted manager's unit. The project will have 79 one-bedroom units, and 1 two-bedroom unit, serving seniors and special needs tenants with rents affordable to households earning 30%-50% of area median income (AMI). The construction is expected to begin in February 2026 and be completed in August 2027. The project will be developed by Community Housing Development Corporation and will be located in Senate District 7 and Assembly District 14.

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-25-718

**Project Name** Ephesian Legacy Court  
 Site Address: 1708 Harmon Street  
 Berkeley, CA 94703  
 County: Alameda  
 Census Tract: 4240.01

<b>Tax Credit Amounts</b>	<b>Federal/Annual</b>	<b>State/Total *</b>
Requested:	\$2,414,508	\$4,766,775
Recommended:	\$2,414,508	\$4,766,775

\* The applicant made an election to sell (Certificate) all or any portion of the state credits.

**Tax-Exempt Bond Allocation**  
 Recommended: \$20,436,012

**CTCAC Applicant Information**  
 CTCAC Applicant/CDLAC Sponsor: Ephesian Legacy Court LP  
 Applicant for State Credits: Community Housing Development Corporation  
 Contact: Donald Gilmore  
 Address: 1535 Fred Jackson Way  
 Richmond, CA 94801  
 Phone: 510-221-2515  
 Email: dgilmore@communityhdc.org

**Bond Financing Information**  
 CDLAC Applicant/Bond Issuer: California Municipal Finance Authority  
 Bond Counsel: Jones Hall, A Professional Law Corporation  
 Private Placement Purchaser: Citibank, N.A.

**Development Team**

General Partners / Principal Owners: CHDC Ephesian Legacy Court, LLC  
 Ephesian Legacy Court Berkeley, LLC  
 General Partner Type: Nonprofit  
 Parent Companies: Community Housing Development Corporation  
 Ephesian Church of God in Christ  
 Developer: Community Housing Development Corporation  
 Investor/Consultant: CitiBank  
 Management Agent: John Stewart Company

**Project Information**

Construction Type: New Construction  
 Total # Residential Buildings: 2  
 Total # of Units: 80  
 No. / % of Low Income Units: 79 100.00%  
 Average Targeted Affordability: 38.35%  
 Federal Set-Aside Elected: 40%/60%  
 Federal Subsidy: Tax-Exempt / HUD Section 8 Project-based Vouchers  
 (40 Units - 50%)

**Information**

Housing Type: Special Needs  
 Seniors  
 % of Special Need Units: 40 units 51%  
 Geographic Area: Bay Area Region  
 State Ceiling Pool: New Construction  
 Set Aside: Homeless Set Aside  
 Homeless Set Aside Units: 40  
 CDLAC Project Analyst: Jake Salle  
 CTCAC Project Analyst: Chris Saenz

**55-Year Use / Affordability**

<u>Aggregate Targeting</u>	<u>Number of Units</u>	<u>Percentage of Affordable Units</u>
30% AMI:	40	51%
40% AMI:	12	15%
50% AMI:	27	34%

**Unit Mix**

79	1-Bedroom Units
1	2-Bedroom Units
80	Total Units

<u>Unit Type &amp; Number</u>	<u>2025 Rents Targeted % of Area Median Income</u>	<u>Proposed Rent (including utilities)</u>
40 1 Bedroom	30%	\$899
12 1 Bedroom	40%	\$1,199
27 1 Bedroom	50%	\$1,498
1 2 Bedrooms	Manager's Unit	\$0

**Project Cost Summary at Application**

Land and Acquisition	\$6,559,023
Construction Costs	\$41,507,914
Rehabilitation Costs	\$0
Construction Hard Cost Contingency	\$2,095,472
Soft Cost Contingency	\$592,535
Relocation	\$0
Architectural/Engineering	\$2,276,076
Const. Interest, Perm. Financing	\$7,177,635
Legal Fees	\$206,234
Reserves	\$856,348
Other Costs	\$3,946,658
Developer Fee	\$5,500,000
Commercial Costs	\$1,558,037
<b>Total</b>	<b>\$72,275,932</b>

**Residential**

Construction Cost Per Square Foot:	\$758
Per Unit Cost:	\$882,374
Estimated Hard Per Unit Cost:	\$479,291
True Cash Per Unit Cost*:	\$861,620
Bond Allocation Per Unit:	\$255,450
Bond Allocation Per Restricted Rental Unit:	\$258,684

**Construction Financing**

Source	Amount
Citibank: Tax-Exempt	\$20,436,012
Citibank: Taxable	\$26,145,474
City of Berkeley: Measure O	\$14,531,301
City of Berkeley: HTF	\$3,556,400
Deferred Costs	\$5,578,459
General Partner Equity	\$100
Tax Credit Equity	\$2,028,187

**Permanent Financing**

Source	Amount
Citibank: Tax-Exempt	\$6,613,000
HCD: MHP	\$18,718,944
City of Berkeley: Measure O	\$14,531,301
City of Berkeley: HTF	\$3,556,400
Deferred Developer Fee	\$1,700,000
General Partner Equity	\$2,685,987
Tax Credit Equity	\$24,470,300
<b>TOTAL</b>	<b>\$72,275,932</b>

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

**Determination of Credit Amount(s)**

Requested Eligible Basis:	\$60,362,704
130% High Cost Adjustment:	No
Applicable Fraction:	100.00%
Qualified Basis:	\$60,362,704
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	\$2,414,508
Total State Credit:	\$4,766,775
Approved Developer Fee in Project Cost:	\$5,500,000
Approved Developer Fee in Eligible Basis:	\$5,372,050
Federal Tax Credit Factor:	\$0.83184
State Tax Credit Factor:	\$0.92000

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 will restrict 40 Low-Income Units (50% of the Low-Income Units) to serve Special Needs Population, as defined in CTCAC Regulations Section 10302(kkk).

**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 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).

<b>Point Criteria</b>	<b>New Const. Max. Points</b>	<b>Rehabilitation Max. Points</b>	<b>Points Scored</b>
Preservation and Other Rehabilitation Project Priorities	0	20	0
New Construction Density and Local Incentives	10	0	10
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	10
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	10
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	120

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:** 146.571%