

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

Shiloh Arms, located at 4009 23rd Avenue in Sacramento on a 4.43 acre site, requested and is being recommended for a reservation of \$1,674,055 in annual federal tax credits and \$9,685,965 of tax-exempt bond cap to finance the acquisition & rehabilitation of 106 units of housing, consisting of 105 restricted rental units and 1 unrestricted manager's unit. The project has 10 studio units, 18 one-bedroom units, 28 two-bedroom units, 42 three-bedroom units, and 8 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 May 2026 and be completed in March 2027. The project will be developed by Orbach Affordable Housing Solutions LLC and is located in Senate District 8 and Assembly District 10.

Shiloh Arms is a resyndication of an existing Low Income Housing Tax Credit (LIHTC) project, Shiloh Arms Apartments (CA-2009-572). 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-25-804

Project Name Shiloh Arms
Site Address: 4009 23rd Avenue
Sacramento, CA 95820
County: Sacramento
Census Tract: 0044.02

Tax Credit Amounts	Federal/Annual	State/Total
Requested:	\$1,674,055	\$0
Recommended:	\$1,674,055	\$0

Tax-Exempt Bond Allocation
Recommended: \$9,685,965

CTCAC Applicant Information
CTCAC Applicant/CDLAC Sponsor: OAHS Shiloh TC LP
Contact: David Baruch
Address: 980 Sylvan Avenue
Englewood Cliffs, NJ 07632
Phone: (201) 793-3117
Email: davidb@OAHSAffordable.com

Bond Financing Information
CDLAC Applicant/Bond Issuer: Sacramento Housing & Redevelopment Agency
Bond Counsel: Orrick, Herrington & Sutcliffe LLP
Private Placement Purchaser: PNC Real Estate

Development Team

General Partners / Principal Owners:	Kingdom Vivante, LLC OAHS Shiloh AGP LLC
General Partner Type:	Nonprofit
Parent Companies:	Kingdom Development, Inc. Orbach Affordable Housing Solutions LLC
Developer:	Orbach Affordable Housing Solutions LLC
Investor/Consultant:	PNC Bank
Management Agent:	Orbach Affordable Management, LLC

Project Information

Construction Type:	Acquisition & Rehabilitation
Total # Residential Buildings:	18
Total # of Units:	106
No. / % of Low Income Units:	105 100.00%
Average Targeted Affordability:	44.86%
Federal Set-Aside Elected:	40%/60%
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based Vouchers (106 Units - 100%) / HOME

Information

Housing Type:	Non-Targeted
Geographic Area:	Northern Region
State Ceiling Pool:	Other Rehabilitation
CDLAC Project Analyst:	Charity Guimont
CTCAC Project Analyst:	Sopida Steinwert

55-Year Use / Affordability

<u>Aggregate Targeting</u>	<u>Number of Units</u>	<u>Percentage of Affordable Units</u>
30% AMI:	53	50%
60% AMI:	52	50%

Unit Mix

10	SRO/Studio Units
18	1-Bedroom Units
28	2-Bedroom Units
42	3-Bedroom Units
8	4-Bedroom Units
106	Total Units

<u>Unit Type & Number</u>	<u>2025 Rents Targeted % of Area Median Income</u>	<u>Proposed Rent (including utilities)</u>
5 SRO/Studio	30%	\$675
5 SRO/Studio	60%	\$837
9 1 Bedroom	30%	\$723
9 1 Bedroom	60%	\$1,349
14 2 Bedrooms	30%	\$868
13 2 Bedrooms	60%	\$1,737
21 3 Bedrooms	30%	\$1,003
21 3 Bedrooms	60%	\$2,006
4 4 Bedrooms	30%	\$1,119
4 4 Bedrooms	60%	\$2,238
1 2 Bedrooms	Manager's Unit	\$0

Project Cost Summary at Application

Land and Acquisition	\$21,928,200
Construction Costs	\$0
Rehabilitation Costs	\$9,390,523
Construction Hard Cost Contingency	\$939,052
Soft Cost Contingency	\$339,160
Relocation	\$796,645
Architectural/Engineering	\$375,000
Const. Interest, Perm. Financing	\$3,531,740
Legal Fees	\$816,000
Reserves	\$868,708
Other Costs	\$333,116
Developer Fee	\$1,500,000
Commercial Costs	\$0
Total	\$40,818,144

Residential

Construction Cost Per Square Foot:	\$102
Per Unit Cost:	\$385,077
Estimated Hard Per Unit Cost:	\$76,934
True Cash Per Unit Cost*:	\$370,432
Bond Allocation Per Unit:	\$91,377
Bond Allocation Per Restricted Rental Unit:	\$92,247

Construction Financing

<u>Source</u>	<u>Amount</u>
PNC Bank: Tax-Exempt	\$9,685,965
PNC Bank: Taxable	\$11,571,804
PNC Bank: Bridge	\$9,160,745
Seller Carryback	\$901,469
SHRA ¹ : HOME	\$2,120,000
Short Term Work Credit	\$530,599
Net Operating Income	\$810,454
Deferred Costs	\$4,631,043
Tax Credit Equity	\$1,406,065

Permanent Financing

<u>Source</u>	<u>Amount</u>
PNC Bank	\$21,257,769
Seller Carryback	\$901,469
SHRA ¹ : HOME	\$2,120,000
Short Term Work Credit	\$530,599
Net Operating Income	\$1,296,726
Deferred Developer Fee	\$650,934
Tax Credit Equity	\$14,060,647
TOTAL	\$40,818,144

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

¹Sacramento Housing and Redevelopment Agency

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	\$15,325,512
130% High Cost Adjustment:	Yes
Requested Eligible Basis (Acquisition):	\$21,928,200
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	\$19,923,166
Qualified Basis (Acquisition):	\$21,928,200
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	\$796,927
Maximum Annual Federal Credit, Acquisition:	\$877,128
Total Maximum Annual Federal Credit:	\$1,674,055
Approved Developer Fee (in Project Cost & Eligible Basis):	\$1,500,000
Federal Tax Credit Factor:	\$0.83992

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 applicant has requested and been granted a waiver to reduce the 10% mobility feature requirement under CTCAC Regulation Section 10325(f)(7)(K) down to 5%.

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-2009-572.) 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-2009-572) 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 with distribution of Net Project Equity, which is otherwise required to set aside a Short Term Work Capitalized Replacement Reserve in the amount of \$530,000. In lieu of a Short Term Work Capitalized Reserve, the applicant is allowed to use the Short Term Work Reserve Amount to fund rehabilitation expenses. The Short Term Work Reserve Amount of \$530,599 is excluded from eligible basis.

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	20
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: 490.978%