**CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE**
**Project Staff Report**
**Tax-Exempt Bond Project**
**July 16, 2014**

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|---|---|---|---|
| **Project Number** | CA-14-866 | | |
| | | | |
| **Project Name** | Westminster Manor | | |
| Site Address: | 1730 Third Avenue | | |
| | San Diego, CA 92101 | County: San Diego | |
| Census Tract: | 0.000 | | |

| **Tax Credit Amounts** | **Federal/Annual** | **State/Total** |
|---|---|---|
| Requested: | $1,523,855 | $0 |
| Recommended: | $1,523,855 | $0 |

**Applicant Information**

| | | | |
|---|---|---|---|
| Applicant: | Westminster Manor, LP | | |
| Contact: | Tim Baker | | |
| Address: | 5993 Avenida Encinas, Suite 101 | | |
| | Carlsbad | CA | 92008 |
| Phone: | 760-456-6000 | Fax: | 760-456-6001 |
| Email: | tbaker@chelseainvestco.com | | |

| | |
|---|---|
| General Partner(s) or Principal Owner(s): | Westminster Manor of San Diego, Inc. |
| | CIC Westminster Manor, LLC |
| General Partner Type: | Joint Venture |
| Parent Company(ies): | Westminster Manor of San Diego, Inc. |
| | Chelsea Investment Corporation |
| Developer: | Chelsea Investment Corporation |
| Investor/Consultant: | The Richman Group |
| Management Agent: | ConAm |

**Project Information**

| | |
|---|---|
| Construction Type: | Acquisition & Rehabilitation |
| Total # Residential Buildings: | 1 |
| Total # of Units: | 152 |
| No. & % of Tax Credit Units: | 150 100.00% |
| Federal Set-Aside Elected: | 40%/60% |
| Federal Subsidy: | Tax-Exempt / HUD Project-Based Section 8 Vouchers (121 Units-80%) |
| HCD MHP Funding: | No |
| 55-Year Use/Affordability: | Yes |
| Number of Units @ or below 50% of area median income: | 16 |
| Number of Units @ or below 60% of area median income: | 134 |

**Bond Information**

| | |
|---|---|
| Issuer: | Housing Authority of the City of San Diego |
| Expected Date of Issuance: | August 7, 2014 |
| Credit Enhancement: | N/A |

**Information**

| | |
|---|---|
| Housing Type: | Seniors |
| Geographic Area: | San Diego County |
| TCAC Project Analyst: | DC Navarrette |

**Unit Mix**

| | |
|---|---|
| 91 | SRO/Studio Units |
| 61 | 1-Bedroom Units |
| 152 | Total Units |

| Unit Type & Number | | 2014 Rents Targeted % of Area Median Income | 2014 Rents Actual % of Area Median Income | Proposed Rent (including utilities) |
|---|---|---|---|---|
| 81 | SRO/Studio | 60% | 60% | $829 |
| 10 | SRO/Studio | 50% | 35% | $488 |
| 40 | 1 Bedroom | 60% | 60% | $888 |
| 13 | 1 Bedroom | 60% | 42% | $623 |
| 6 | 1 Bedroom | 50% | 42% | $623 |
| 2 | 1 Bedroom | Manager's Unit | Manager's Unit | $0 |

**Project Financing**

| | |
|---|---|
| Estimated Total Project Cost: | $55,115,634 |
| Estimated Residential Project Cost: | $55,115,634 |

**Residential**

| | |
|---|---|
| Construction Cost Per Square Foot: | $102 |
| Per Unit Cost: | $362,603 |

**Construction Financing**

| Source | Amount |
|---|---|
| Union Bank - TE Bonds | $25,309,189 |
| Seller Note | $25,165,409 |
| Existing Reserves | $786,748 |
| Accrued Soft Loan Interest | $1,321,184 |
| Deferred Costs | $2,483,105 |
| Tax Credit Equity | $50,000 |

**Permanent Financing**

| Source | Amount |
|---|---|
| Union Bank - TE Bonds A | $5,641,488 |
| Union Bank - TE Bonds B | $6,974,184 |
| Seller Note | $25,165,409 |
| Existing Reserves | $786,748 |
| Accrued Soft Loan Interest | $1,321,182 |
| Developer Equity | $750,000 |
| Tax Credit Equity | $14,476,623 |
| **TOTAL** | **$55,115,634** |

**Determination of Credit Amount(s)**

| | |
|---|---|
| Requested Eligible Basis (Rehabilitation): | $20,516,206 |
| 130% High Cost Adjustment: | Yes |
| Requested Eligible Basis (Acquisition): | $18,681,765 |
| Applicable Fraction: | 100.00% |
| Qualified Basis (Rehabilitation): | $26,671,068 |
| Qualified Basis (Acquisition): | $18,681,765 |
| Applicable Rate: | 3.36% |
| Maximum Annual Federal Credit, Rehabilitation: | $896,148 |
| Maximum Annual Federal Credit, Acquisition: | $627,707 |
| Total Maximum Annual Federal Credit: | $1,523,855 |
| Approved Developer Fee (in Project Cost & Eligible Basis): | $2,500,000 |
| Investor/Consultant: | The Richman Group |
| Federal Tax Credit Factor: | $0.95000 |

Per Regulation Section 10322(i)(4)(A), 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, will be used during all subsequent reviews including the placed in service review, for the purpose of determining the final award of Tax Credits.

Per Regulation Section 10327(c)(2)(C), Once established at the initial funded application, the developer fee cannot be increased, but may be decreased, in the event of a modification in basis.

**Eligible Basis and Basis Limit**

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|---|---|
| Requested Unadjusted Eligible Basis: | $39,197,972 |
| Actual Eligible Basis: | $48,491,206 |
| Unadjusted Threshold Basis Limit: | $32,664,976 |
| Total Adjusted Threshold Basis Limit: | $39,197,972 |

**Adjustments to Basis Limit:**

Local Development Impact Fees

95% of Upper Floor Units are Elevator-Serviced

55-Year Use/Affordability Restriction – 1% for Each 1% of Low-Income Units are Income Targeted between 50% AMI & 36% AMI: 10%

**Cost Analysis and Line Item Review**

Staff analysis of project costs to determine reasonableness found all fees to be within TCAC’s underwriting guidelines and TCAC limitations. Annual operating expenses exceed the minimum operating expenses established in the Regulations, and the project pro forma shows a positive cash flow from year one. Staff has calculated federal tax credits based on 3.36% of the qualified basis. Applicants are cautioned to consider the expected federal rate when negotiating with investors. TCAC's financial evaluation at project completion will determine the final allocation.

**Special Issues/Other Significant Information:** None.

**Local Reviewing Agency:**
The Local Reviewing Agency has not yet completed a site review of this project. Any negative comments in the LRA report will cause this staff report to be revised to reflect such comments.

**Recommendation:** Staff recommends that the Committee make a preliminary reservation of tax credits in the following amount(s) contingent upon standard conditions and any additional conditions imposed by the Committee:

| **Federal Tax Credits/Annual** | **State Tax Credits/Total** |
|---|---|
| **$1,523,855** | **$0** |

**Standard Conditions**
If applicant is receiving tax-exempt bond financing from other than CalHFA, the applicant shall apply for a bond allocation from the California Debt Limit Allocation Committee's next scheduled meeting, if not previously granted an allocation; shall have received an allocation from CDLAC; and, 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.

The IRS has advised TCAC that the amount of tax-exempt bonds issued, equivalent to at least 50% of aggregate basis, must remain in place through the first year of the credit period or until eligible basis is finally determined.

TCAC 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 TCAC.

The applicant must pay TCAC a reservation fee calculated in accordance with regulation. Additionally, TCAC 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 TCAC limitations. Fees in excess of these limitations will not be considered when determining the amount of credit when the project is placed-in-service.

The applicant/owner shall be subject to underwriting criteria set forth in Section 10327 of the regulations through the final feasibility analysis performed by TCAC 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 TCAC in its final feasibility analysis.

**Additional Conditions:** The applicant/owner is required to complete the following sustainable building methods in accordance with the bond allocation from CDLAC and provide the applicable certifications and documentation when the TCAC placed-in-service application is submitted:

- The project commits to improve energy efficiency above the modeled energy consumption of the building(s) by a 15% decrease, based on an estimated annual energy use, in the buildings Home Energy Rating System II (HERSII) post rehabilitation.