**CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE**
**CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE**
**Project Staff Report**
**Qualified Private Activity Tax-Exempt Bond Project**
**September 1, 2026**

Chestnut Linden Resyndication, located at 1050 West Grand Avenue and 1089 26th Street in Alameda County on a total of 4.42 acres, requested $3,646,901 in annual federal tax credits but is being recommended for $3,642,685 in annual federal tax credits and $21,414,500 of tax-exempt bond cap to finance the acquisition & rehabilitation of 145 units of housing, consisting of 149 restricted rental units and 2 unrestricted manager's units. The project has 19 one-bedroom units, 57 two-bedroom units, 61 three-bedroom units, 8 four-bedroom units, and 6 five-bedroom units, serving families with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in February 2027 and be completed in December 2028. The project will be developed by BRIDGE Housing Corporation and is located in Senate District 7 and Assembly District 18.

Chestnut Linden Resyndication is a resyndication of an existing Low Income Housing Tax Credit (LIHTC) project, Chestnut Linden Court (CA-2001-097). 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-26-571

**Project Name** Chestnut Linden Resyndication

| Site Addresses: | Site 1: Chestnut | Site 2: Linden |
|---|---|---|
| | 1050 West Grand Avenue | 1089 26th Street |
| | Oakland, CA 94607 | Oakland, CA 94607 |
| | County: Alameda | County: Alameda |
| | Census Tract: 4016.00 | Census Tract: 4016.00 |

**Tax Credit Amounts**

| | **Federal/Annual** | **State/Total** |
|---|---|---|
| Requested: | $3,646,901 | $0 |
| Recommended: | $3,642,685 | $0 |

**Tax-Exempt Bond Allocation**

Recommended: $21,414,500

**CTCAC Applicant Information**

| | |
|---|---|
| CTCAC Applicant/CDLAC Sponsor: | Chestnut Linden Affordable, LP |
| Contact: | Connor Clark |
| Address: | 350 California Street, 16th Floor<br>San Francisco, CA 94104 |
| Phone: | 415-321-4009 |
| Email: | cclark@bridgehousing.com |

**Bond Financing Information**

| | |
|---|---|
| CDLAC Applicant/Bond Issuer: | California Municipal Finance Authority |
| Bond Counsel: | Jones Hall, A Professional Law Corporation |
| Private Placement Purchaser: | U.S. Bank National Association |

**Development Team**

| | |
|---|---|
| General Partner / Principal Owner: | BRIDGE Chestnut Linden LLC |
| General Partner Type: | Nonprofit |
| Parent Company: | BRIDGE Housing Corporation |
| Developer: | BRIDGE Housing Corporation |
| Investor/Consultant: | California Housing Partnership |
| Management Agent: | Brighthaven Communities Ltd. |

**Project Information**

| | | |
|---|---|---|
| Construction Type: | Acquisition & Rehabilitation | |
| Total # Residential Buildings: | 16 | |
| Total # of Units: | 151 | |
| No. / % of Low Income Units: | 149 | 100.00% |
| Average Targeted Affordability: | 48.69% | |
| Federal Set-Aside Elected: | 40%/60% | |
| Federal Subsidy: | Tax-Exempt / HUD Section 8 Project-based Vouchers (83 Units - 55%) / HUD HOPE VI | |

**Information**

| | |
|---|---|
| Housing Type: | Large Family |
| Geographic Area: | Bay Area Region |
| State Ceiling Pool: | Acquisition/Rehabilitation |
| Set Aside: | N/A |
| Project Analyst: | Ruben Barcelo |

**55-Year Use / Affordability**

| Aggregate Targeting | Number of Units | Percentage of Affordable Units |
|---|---|---|
| 30% AMI: | 33 | 22% |
| 40% AMI: | 12 | 8% |
| 45% AMI: | 15 | 10% |
| 50% AMI: | 23 | 15% |
| 60% AMI: | 66 | 44% |

**Unit Mix**

| | |
|---|---|
| 19 | 1-Bedroom Units |
| 57 | 2-Bedroom Units |
| 61 | 3-Bedroom Units |
| 8 | 4-Bedroom Units |
| 6 | 5-Bedroom Units |
| 151 | Total Units |

| Unit Type & Number | | 2025 Rents Targeted % of Area Median Income | Proposed Rent (including utilities) |
|---|---|---|---|
| 5 | 2 Bedrooms | 30% | $1,079 |
| 10 | 3 Bedrooms | 30% | $1,246 |
| 3 | 4 Bedrooms | 30% | $1,390 |
| 6 | 2 Bedrooms | 40% | $1,438 |
| 4 | 3 Bedrooms | 40% | $1,662 |
| 2 | 2 Bedrooms | 45% | $1,618 |
| 5 | 4 Bedrooms | 45% | $2,085 |
| 10 | 3 Bedrooms | 50% | $2,077 |
| 4 | 1 Bedroom | 60% | $616 |
| 17 | 2 Bedrooms | 60% | $1,065 |
| 2 | 3 Bedrooms | 60% | $1,032 |
| 3 | 2 Bedrooms | 60% | $2,158 |
| 2 | 2 Bedrooms | 30% | $1,079 |
| 11 | 3 Bedrooms | 30% | $1,246 |
| 2 | 5 Bedrooms | 30% | $1,495 |
| 2 | 2 Bedrooms | 40% | $1,438 |
| 4 | 3 Bedrooms | 45% | $1,869 |
| 4 | 5 Bedrooms | 45% | $2,242 |
| 13 | 3 Bedrooms | 50% | $2,077 |
| 12 | 1 Bedroom | 60% | $929 |
| 16 | 2 Bedrooms | 60% | $1,359 |
| 5 | 3 Bedrooms | 60% | $1,791 |
| 3 | 1 Bedroom | 60% | $1,798 |
| 4 | 2 Bedrooms | 60% | $2,158 |
| 2 | 3 Bedrooms | Manager’s Unit | $0 |

| Project Cost Summary at Application | |
|---|---|
| Land and Acquisition | $27,922,342 |
| Construction Costs | $0 |
| Rehabilitation Costs | $29,400,398 |
| Construction Hard Cost Contingency | $2,940,040 |
| Soft Cost Contingency | $632,605 |
| Relocation | $1,541,603 |
| Architectural/Engineering | $1,219,979 |
| Const. Interest, Perm. Financing | $7,930,315 |
| Legal Fees | $175,000 |
| Reserves | $1,369,415 |
| Other Costs | $1,294,261 |
| Developer Fee | $7,593,519 |
| Commercial Costs | $397,683 |
| **Total** | **$82,417,160** |

**Residential**

| | |
|---|---|
| Construction Cost Per Square Foot: | $199 |
| Per Unit Cost: | $543,033 |
| Estimated Hard Per Unit Cost: | $175,139 |
| True Cash Per Unit Cost*: | $433,117 |
| Bond Allocation Per Unit: | $141,818 |
| Bond Allocation Per Restricted Rental Unit: | $143,721 |

**Construction Financing**

| Source | Amount |
|---|---|
| U.S. Bank: Tax-Exempt | $21,414,500 |
| U.S. Bank: Taxable | $16,754,416 |
| Seller Carryback | $12,379,745 |
| OHA[1]: HOPE VI | $9,368,862 |
| OHA[1] | $1,209,884 |
| OHA[1]: Ground Lease Chestnut | $25 |
| OHA[1]: Ground Lease Linden | $400,000 |
| City of Oakland | $4,341,509 |
| Acquired Reserves | $1,257,727 |
| Deferred Interest | $3,498,616 |
| Deferred Costs | $3,474,896 |
| Deferred Developer Fee | $4,302,500 |
| Tax Credit Equity | $4,050,429 |

**Permanent Financing**

| Source | Amount |
|---|---|
| U.S. Bank: Tax-Exempt | $14,597,000 |
| Seller Carryback | $12,379,745 |
| OHA[1]: HOPE VI | $9,368,862 |
| OHA[1] | $1,209,884 |
| OHA[1]: Ground Lease Chestnut | $25 |
| OHA[1]: Ground Lease Linden | $400,000 |
| City of Oakland | $4,341,509 |
| Acquired Reserves | $1,257,727 |
| Deferred Interest | $3,498,616 |
| Deferred Developer Fee | $4,302,500 |
| Tax Credit Equity | $31,061,292 |
| **TOTAL** | **$82,417,160** |

*Less Donated Land, Seller Carryback Loans, Waived Fees, and Deferred Developer Fee
[1]Oakland Housing Authority

**Determination of Credit Amount(s)**

| | |
|---|---|
| Requested Eligible Basis (Rehabilitation): | $47,140,438 |
| 130% High Cost Adjustment: | Yes |
| Requested Eligible Basis (Acquisition): | $29,889,949 |
| Applicable Fraction: | 100.00% |
| Qualified Basis (Rehabilitation): | $61,282,569 |
| Qualified Basis (Acquisition): | $29,889,949 |
| Applicable Rate: | 4.00% |
| Maximum Annual Federal Credit, Rehabilitation: | $2,447,087 |
| Maximum Annual Federal Credit, Acquisition: | $1,195,598 |
| Total Maximum Annual Federal Credit: | $3,642,685 |
| Approved Developer Fee in Project Cost: | $7,593,519 |
| Approved Developer Fee in Eligible Basis: | $7,572,082 |
| Federal Tax Credit Factor: | $0.85270 |

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.

**Significant Information / Additional Conditions**

Throughout the Compliance Period, a “qualified nonprofit organization" within the meaning of Section 42(h)(5)(C) of the Code shall own an interest in the Project and shall materially participate (within the meaning of Section 469(h)) in the development and operation of the Project.  Staff has verified that the resyndication includes a nonprofit participant as a general partner.

This project involves the substantial rehabilitation of 17 buildings located across two scattered sites located in the city of Oakland.

**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-01-097). 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-01-097) 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 and the terms of the bond and tax credit award as presented in the application and summarized in this staff report. CTCAC will verify the project complied with all terms of the award at placed-in-service review.

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).

## CA-26-571 / Chestnut Linden Resyndication

| Points System | Max. Possible New Const. | Max. Possible Rehab. | Points Requested | Points Awarded |
|---|---|---|---|---|
| **Acquisition/Rehabilitation Project Priorities** | **0** | **20** | **19** | **19** |
| No distribution of net project equity to GP/related party<br>No partial/full repayment of existing soft financing >500k or 1.5% TDC<br>Cash-out developer fee limited to 80% of CTCAC cash-out limit | 0 | 10 | 10 | 10 |
| HUD RAD or new USDA Section 515 rehabiliation project | 0 | 9 | 9 | 9 |
| **Exceeding Minimum Income Restrictions** | **20** | **20** | **20** | **20** |
| Average targeted affordability is 11 percent below 60% | 20 | 20 | 20 | 20 |
| **Exceeding Minimum Rent Restrictions** | **10** | **10** | **10** | **10** |
| Average targeted affordability is 53% below market comparables | 10 | 10 | 10 | 10 |
| **General Partner & Management Company** | **10** | **10** | **10** | **10** |
| General Partner Experience | 7 | 7 | 7 | 7 |
| Management Company Experience | 3 | 3 | 3 | 3 |
| **Readiness to Proceed** | **10** | **10** | **10** | **10** |
| **Service Amenities** | **10** | **10** | **10** | **10** |
| **LARGE FAMILY, SENIOR, AT-RISK HOUSING TYPES; NON-TARGETED** | | | | |
| Service Coordinator, minimum ratio of 1 FTE to 600 bedrooms | 5 | 5 | 5 | 5 |
| Adult ed/health & wellness/skill bldg classes, min. 60 hrs/yr instruction | 5 | 5 | 5 | 5 |
| **Cost Containment** | **12** | **12** | **12** | **12** |
| Project eligible basis is 62% less than the CDLAC adjusted TBL; 1 pt per % | 12 | 12 | 12 | 12 |
| **Site Amenities** | **10** | **10** | **10** | **10** |
| **Site 1: Chestnut** | | | | |
| Within ⅓ mile of transit, service every 30 min, 25 units/acre density | 7 | 7 | 7 | 7 |
| Within ½ mile of public park or community center open to general public | 3 | 3 | 3 | 3 |
| Within ½ mile of a full-scale grocery/supermarket of at least 25,000 sf | 5 | 5 | 5 | 5 |
| Within 1 mile of a public high school | 3 | 3 | 3 | 3 |
| **Site 2: Linden** | | | | |
| Within ⅓ mile of transit, service every 30 min, 25 units/acre density | 7 | 7 | 7 | 7 |
| Within ½ mile of public park or community center open to general public | 3 | 3 | 3 | 3 |
| Within ½ mile of a full-scale grocery/supermarket of at least 25,000 sf | 5 | 5 | 5 | 5 |
| Within 1 mile of a public high school | 3 | 3 | 3 | 3 |
| **Total Points** | **112** | **102** | **101** | **101** |

**Tie Breaker:** 373.049%