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

Soledad Senior Apartments, located at 520 Andalucia Drive in Soledad on a 2.37 acre site, requested and is being recommended for a reservation of $250,959 in annual federal tax credits and $2,375,000 of tax-exempt bond cap to finance the acquisition & rehabilitation of 40 units of housing, consisting of 39 restricted rental units and 1 unrestricted manager's unit. The project has 39 one-bedroom units, and 1 two-bedroom unit, serving seniors with rents affordable to households earning 30%-60% of area median income (AMI). The construction is expected to begin in December 2026 and be completed in December 2027. The project will be developed by Co-Dev: Sunset Development Partners, LLC / City Development Partners LLC and is located in Senate District 17 and Assembly District 29.

Soledad Senior Apartments is a resyndication of an existing Low Income Housing Tax Credit (LIHTC) project, Soledad Senior Apartments (CA-93-019). 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-26-638

Project Name Soledad Senior Apartments

Site Address:	520 Andalucia Drive Soledad, CA 93960
County:	Monterey
Census Tract:	0111.05

Tax Credit Amounts

	Federal/Annual	State/Total
Requested:	$250,959	$0
Recommended:	$250,959	$0

Tax-Exempt Bond Allocation

Recommended:	$2,375,000

CTCAC Applicant Information

CTCAC Applicant/CDLAC Sponsor:	Soledad Apartments, LP
Contact:	Edward Mackay
Address:	531 Mill Road Auburn, CA 95603
Phone:	530-888-7097
Email:	beneficialhousing@gmail.com

Bond Financing Information

CDLAC Applicant/Bond Issuer:	CMFA
Bond Counsel:	Orrick, Harrington & Sutcliffe LLP
Public Sale:	Applicable
Underwriter:	Applicable

Development Team

General Partners / Principal Owners:	Edward Mackay Enterprises, LLC The Beneficial Housing Foundation
General Partner Type:	Joint Venture
Parent Companies:	Edward Mackay Enterprises, LLC The Beneficial Housing Foundation
Developer:	Sunset Development Partners, LLC City Development Partners LLC
Investor/Consultant:	The Richman Group
Management Agent:	AWI Management Corporation

Project Information

Construction Type:	Acquisition & Rehabilitation	
Total # Residential Buildings:	10	
Total # of Units:	40	
No. / % of Low Income Units:	39	100.00%
Average Targeted Affordability:	49.74%	
Federal Set-Aside Elected:	40%/60%	
Federal Subsidy:	Tax-Exempt / HUD Section 8 Project-based (39 Units - 97%)	

Information

Housing Type:	Seniors
Geographic Area:	Coastal Region
State Ceiling Pool:	Acquisition/Rehabilitation
Set Aside:	N/A
Project Analyst:	Jacob Paixao

55-Year Use / Affordability

Aggregate Targeting	Number of Units	Percentage of Affordable Units
30% AMI:	4	10%
40% AMI:	4	10%
50% AMI:	20	51%
60% AMI:	11	28%

Unit Mix

39	1-Bedroom Units
1	2-Bedroom Units
40	Total Units

Unit Type & Number		2025 Rents Targeted % of Area Median Income	Proposed Rent (including utilities)
4	1 Bedroom	30%	$813
4	1 Bedroom	40%	$1,084
20	1 Bedroom	50%	$1,355
11	1 Bedroom	60%	$1,626
1	2 Bedrooms	Manager’s Unit	$0

Project Cost Summary at Application

Land and Acquisition	$2,665,000
Construction Costs	$0
Rehabilitation Costs	$3,292,000
Construction Hard Cost Contingency	$326,200
Soft Cost Contingency	$150,000
Relocation	$140,000
Architectural/Engineering	$202,620
Const. Interest, Perm. Financing	$1,066,785
Legal Fees	$175,000
Reserves	$205,000
Other Costs	$244,760
Developer Fee	$891,781
Commercial Costs	$0
Total	**$9,359,146**

Residential

Construction Cost Per Square Foot:	$119
Per Unit Cost:	$233,979
Estimated Hard Per Unit Cost:	$70,750
True Cash Per Unit Cost*:	$233,841
Bond Allocation Per Unit:	$59,375
Bond Allocation Per Restricted Rental Unit:	$60,897

Construction Financing

Source	Amount
Bonneville: Tax-Exempt	$2,375,000
Bonneville: Taxable	$4,025,000
USDA RD 515	$1,404,762
Existing Reserves	$341,670
Deferred Developer Fee	$692,064
Tax Credit Equity	$520,650

Permanent Financing

Source	Amount
Bonneville: Taxable	$5,725,000
USDA RD 515	$1,404,762
Existing Reserves	$341,670
Deferred Developer Fee	$5,521
Tax Credit Equity	$1,882,193
TOTAL	**$9,359,146**

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

Determination of Credit Amount(s)

Requested Eligible Basis (Rehabilitation):	$4,025,520
130% High Cost Adjustment:	No
Requested Eligible Basis (Acquisition):	$2,248,470
Applicable Fraction:	100.00%
Qualified Basis (Rehabilitation):	$4,025,520
Qualified Basis (Acquisition):	$2,248,470
Applicable Rate:	4.00%
Maximum Annual Federal Credit, Rehabilitation:	$161,020
Maximum Annual Federal Credit, Acquisition:	$89,939
Total Maximum Annual Federal Credit:	$250,959
Approved Developer Fee (in Project Cost & Eligible Basis):	$891,781
Federal Tax Credit Factor:	$0.75000

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:
The reservation of tax credits is contingent upon verification of the rental subsidy annual amount, number of units receiving assistance, term, and expiration date by the bond issuance deadline.

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-1993-019).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-1993-019) is a qualified low-income household for the subsequent allocation (existing household eligibility is “grandfathered”).

The project is a re-syndication 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 $245,650. 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 $45,650 is excluded from eligible basis. In addition, the seller of the project will give a credit in the amount of $200,000, allowing the applicant to use Short Term Work Reserve Amount to fund rehabilitation expenses and to receive eligible basis for that amount.

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-26-638 / Soledad Senior Apartments

Points System	Max. Possible		Points Requested	Points Awarded
	New Const.	Rehab.		
Acquisition/Rehabilitation Project Priorities	**0**	**20**	**17**	**17**
No distribution of net project equity to GP/related party No partial/full repayment of existing soft financing >500k or 1.5% TDC Cash-out developer fee limited to 80% of CTCAC cash-out limit	0	10	10	10
LIHTC project, >20 years from PIS	0	7	7	7
Exceeding Minimum Income Restrictions	**20**	**20**	**20**	**20**
Tax Credit Units: 10% @ <=30% AMI & 10% @ <=50% AMI	20	0	20	20
Exceeding Minimum Rent Restrictions	**10**	**10**	**10**	**10**
Average targeted affordability is 28% 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				
Adult ed/health & wellness/skill bldg classes, min. 84 hrs/yr instruction	7	7	7	7
Health & wellness services and programs, minimum 60 hrs per 100 bdrms	3	3	3	3
SPECIAL NEEDS, SRO HOUSING TYPES; NON-TARGETED				
Cost Containment	**12**	**12**	**12**	**12**
Project eligible basis is 77% less that the CDLAC adjusted TBL; 1 pt per %	12	12	12	12
Site Amenities	**10**	**10**	**10**	**10**
Within ⅓ mile of transit, service every 30 minutes in rush hours	6	6	6	6
Within 1 mile of public park or community center open to general public	3	3	3	3
Within 1 mile of public library	3	3	3	3
Within 2 miles of a full-scale grocery/supermarket of at least 25,000 sf	4	4	4	4
Within 1½ miles of an adult education campus or community college	3	3	3	3
Within 1 mile of medical clinic or hospital	3	3	3	3
Within 1 mile of a pharmacy	2	2	2	2
Total Points	**112**	**102**	**99**	**99**

Tie Breaker: 666.820%