LINDA CHU TAKAYAMA DIRECTOR

DAMIEN A. ELEFANTE DEPUTY DIRECTOR



STATE OF HAWAII DEPARTMENT OF TAXATION

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To: The Honorable Tom Brower, Chair

and Members of the House Committee on Housing

Date: Tuesday, February 12, 2019

Time: 10:15 A.M.

Place: Conference Room 423, State Capitol

From: Linda Chu Takayama, Director

Department of Taxation

Re: H.B. 1533, Relating to Historic Preservation

The Department of Taxation (Department) offers the following comments regarding H.B. 1533 for the Committee's consideration.

H.B. 1533 establishes a new nonrefundable tax credit for taxpayers who rehabilitate historic structures to create or rehabilitate affordable housing. A summary of key provisions are as follows:

- Adds a new section to Hawaii Revised Statutes (HRS) chapter 235, creating a nonrefundable tax credit for qualified expenses incurred in the certified rehabilitation of a certified historic structure resulting in the creation or rehabilitation of affordable housing units;
- Sets the amount of the credit at 25% of the qualified expenses or 30% if at least twenty percent of the units are for affordable rental housing or at least ten percent are sold for affordable homeownership under affordable housing guidelines;
- Creates a carryforward where a credit that exceeds the taxpayer's income tax liability
 may be used as a credit against the taxpayer's income tax liability in subsequent years
 until exhausted;
- Creates an unspecified aggregate cap on the total amount of credits that may be certified
 in taxable years and directs the State Historic Preservation Division to discontinue
 certifying credits if the cap is reached;
- Requires taxpayers to submit a written, certified statement to the State Historic Preservation Division identifying their qualified expenses and the amount of credits claimed in the previous taxable year;
- Requires the State Historic Preservation Division to certify expenses, maintain records of

Department of Taxation Testimony HSG HB 1533 February 12, 2019 Page 2 of 3

all qualified expenses, and provide taxpayers certifications of credit amounts;

- Authorizes the Director of Taxation to require proof of the claim for the tax credit; and
- Applies to taxable years beginning after December 31, 2019.

First, the Department notes that this credit does not contain a provision that disallows the credit if a deduction is claimed nor does it contain a provision that reduces the basis of the property by the amount of credit. Accordingly, the Department suggests that subsection (c) be amended to read as follows:

(c) In the case of a partnership, S corporation, estate, or trust, the tax credit allowable is for qualified expenses incurred by the entity for the taxable year. The cost upon which the tax credit is computed shall be determined at the entity level. Distribution and share of credit shall be determined pursuant to section 704 of the Internal Revenue Code.

If a deduction is taken under section 179 (with respect to election to expense depreciable business assets) of the Internal Revenue Code, no tax credit shall be allowed for that portion of the qualified expense for which the deduction is taken.

The basis of eligible property for depreciation or accelerated cost recovery system purposes for state income taxes shall be reduced by the amount of credit allowable and claimed. In the alternative, the taxpayer shall treat the amount of the credit allowable and claimed as a taxable income item for the taxable year in which it is properly recognized under the method of accounting used to compute taxable income.

Second, the Department suggests applying the aggregate cap to calendar years rather than taxable years. The Department suggests amending subsection (e) to read as follows:

- (e) The total amount of tax credits allowed under this section shall not exceed:
 - (1) \$____ for qualified expenses incurred from January 1, 2020 to December 31, 2020;
 - (2) \$____ for qualified expenses incurred from January 1, 2021 to December 31, 2021;
 - (3) \$____ for qualified expenses incurred from January 1, 2022 to December 31, 2022;
 - (4) \$____ for qualified expenses incurred from January 1, 2023 to December 31, 2023;

Department of Taxation Testimony HSG HB 1533 February 12, 2019 Page 3 of 3

(5) \$____ annually for qualified expenses incurred after December 31, 2023.

Third, the Department recommends adding a recapture provision. A taxpayer may claim qualified expenses in one year, and then in a subsequent year elect to abandon its rehabilitation project, or to abandon its intention to provide affordable housing. Without a recapture provision, the State would not be able to recover the tax credits taken by such a taxpayer. The Department recommends adding a new subsection to read:

Any credit under this section shall be recaptured following the close of the taxable year for which the credit is claimed if the department of land and natural resources notifies the department that the taxpayer's certification of qualified expenses from which the credit arose has been withdrawn due to failure to comply with the requirements of this section.

Thank you for the opportunity to provide comments.

DAVID V. IGE GOVERNOR OF HAWAII





STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

Testimony of SUZANNE D. CASE Chairperson

Before the House Committee on HOUSING

Tuesday, February 12, 2019 10:15 AM State Capitol, Conference Room 423

In consideration of **HOUSE BILL 1533** RELATING TO HISTORIC PRESERVATION

House Bill 1533 proposes to amend Chapter 235, Hawaii Revised Statutes (HRS), creating a tax credit for certified rehabilitation of certified historic buildings. Tax incentives for rehabilitation of historic buildings have been proven to be enormously effective in preserving important buildings, ensuring their continuing economic viability, revitalizing communities, especially historic downtowns, preserving community character, and promoting heritage tourism. The Department of Land and Natural Resources (Department) supports this measure and recommends amendments.

In its 2018 report on the federal historic tax credit program, the National Park Service (NPS) prepared in collaboration with Rutgers University (copy attached for your reference), notes that NPS certified 1,035 completed historic rehabilitation projects. The report documents \$6.5 billion in rehabilitation investment during federal fiscal year 2017 (the last year for which figures are available), helped create 106,900 jobs, and \$6.2 billion of gross domestic product.

If House Bill 1533 is enacted, Hawaii will join the 38 states that already provide tax credits for the rehabilitation of historic structures. The nature of each state program is different, so it is difficult to extract information from them that could be directly useful in evaluating the effect of the program proposed in House Bill 1533. All states report that their programs are successful both in giving new life and continuing utility to significant historic structures, leveraging private investment at between \$4 and \$5

SUZANNE D. CASE

CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT CONSERVATION AND COASTAL LANDS CONSERVATION AND RESOURCES ENFORCEMENT ENGINEERING ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION

LAND STATE PARKS

per tax credit dollar, contributing significant positive economic impact to affected communities.... At between 4 and 9 years, depending on the state and the level of the credit, generating revenue to the state exceeding the decrease in revenue due to the tax credit. Since the credit is paid out after the project is completed, the revenue payback begins from taxes on wages, goods, and services, before the credit is claimed.

To clarify that House Bill 1533 is intended to provide an incentive to promote rehabilitation of income producing historic properties and an additional, higher incentive to rehabilitation projects that provide affordable housing the Department recommends that:

Page 1, lines 7 through 9 should be amended to read "qualified expenses incurred in the certified rehabilitation of an incoming producing certified historic structure, resulting in the creation or rehabilitation of affordable housing units."

Page 1, line 14 should be amended to read "(1) twenty-five per cent of the qualified expenses <u>incurred in the rehabilitation of an incoming producing</u>, certified historic structure;…"

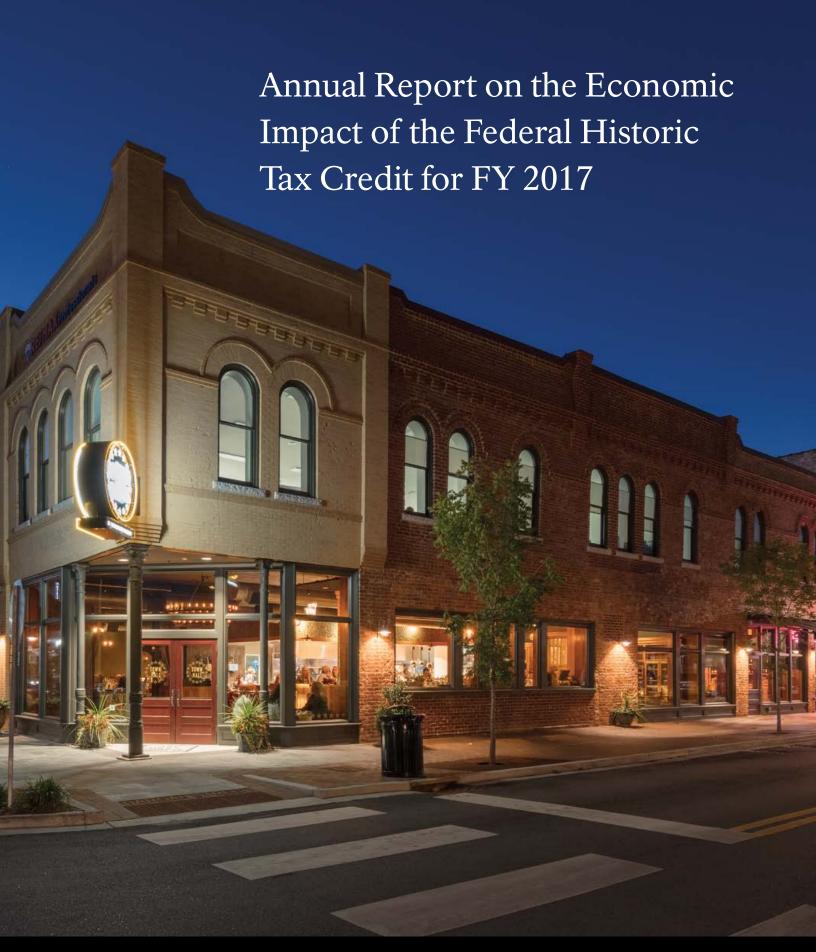
Page 1, line 15 and 16 should be amended to read "(2) thirty per cent of the qualified expenses <u>incurred in the rehabilitation of an incoming producing, certified historic structure;</u> provided that:..."

Finally, the Department believes that establishment of this program will require one full time, temporary staff person for the years 2019-2020 and 2020-2012 and recommends that

Page 7, line 8 be amended to read "2020-2021 for one part time (0.5) full time (1.0 FTE), temporary position to assist in the...".

The Department believes that tax credit programs such as this can make an important contribution to the comprehensive state historic preservation program established by chapter 6E HRS.

Thank you for the opportunity to comment on this matter.





Edward J. Bloustein School of Planning and Public Policy



National Park Service

U.S. Department of the Interior Technical Preservation Services Front Cover Image: Zeigler's Drug Store/Allen's Hall, Florence, South Carolina

Photo: Lucas Brown, Kickstand Studio

Rutgers

Edward J. Bloustein School of Planning and Public Policy

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Technical Preservation Services National Park Service U. S. Department of the Interior Washington, DC 20240 https://www.nps.gov/tps/ The executive summary is based on the findings of a National Park Service-funded study undertaken through a cooperative agreement with Rutgers University's Center for Urban Policy Research. Rutgers University is responsible for the content of the study. Some additional demographic analysis was provided courtesy of PolicyMap. The National Trust for Historic Preservation assisted the National Park Service in the preparation of the case studies.

September 2018

A Message from the National Park Service

Beyond the National Park System, the National Park Service (NPS) is part of a national preservation partnership working to promote the preservation of historic resources in communities small and large throughout the country. For the past 40 years, the NPS, in partnership with the State Historic Preservation Offices, has administered the Federal Historic Preservation Tax Incentives Program. The program provides a 20% Federal tax credit to property owners who undertake a substantial rehabilitation of a historic building in a business or income-producing use while maintaining its historic character.

Commonly referred to as the Historic Tax Credit (HTC), the HTC is designed to not only preserve and rehabilitate historic buildings, but to also promote the economic revitalization of older communities in the nation's cities and towns, along Main Streets, and in rural areas. Since the program's inception in 1976, the NPS has certified the rehabilitation of more than 43,000 historic properties throughout the United States, with the HTC leveraging over \$144 billion in private investment in historic rehabilitation and generating over 2.5 million jobs.

In Fiscal Year (FY) 2017, 1,035 completed historic rehabilitation projects were certified by the NPS, representing \$5.82 billion in estimated rehabilitation costs that qualify for the 20% Federal tax credit. (Another 1,501 proposed projects were also approved in FY 2017.) Many of these projects involved buildings that were abandoned or underutilized and in need of substantial rehabilitation to return them to, or for their continued, economic viability. The HTC is an important tool in helping to revitalize older, economically depressed communities. Based on project data provided by the NPS, PolicyMap (a web-based online data and mapping application) determined that 50% of the certified rehabilitation projects in FY 2017 were located in low- and moderate-income census tracks, and over 79% were located in economically distressed areas.

A common misconception about the HTC is that it only supports large projects and projects in large cities. Half of all projects in FY 2017 were under \$1 million, and 20% were under \$250,000. PolicyMap determined that a quarter of all certified rehabilitation projects in FY 2017 were located in communities with under 50,000 in population and over 15% in communities with under 25,000 in population.

The NPS issues annual reports on the HTC program quantifying the number of historic rehabilitations certified each year, their reported costs, and other statistical information on the program. The FY 2017 annual report is available on the NPS Technical Preservation Services website at http://www.nps.gov/tps/taxincentives.htm, along with information on the HTC program in general.

For FY 2017, the NPS also turned to the Rutgers University's Center for Urban Policy Research, through a cooperative agreement, to undertake and report on the economic impacts of the HTC for the fiscal year ending September 30, 2017. This report highlights its main findings. An economic model originally developed by the Center under a series of grants from the NPS was utilized in the preparation of this report. The economic model was utilized by the Center for their eight prior reports on the Federal HTC, as well as for a number of other economic reports for state governments and others.

As the Center's report shows, the level and breadth of the positive economic impacts resulting from the Federal HTC in FY 2017 are quite striking. In addition, the report includes information on the cumulative economic impact of the Federal Historic Preservation Tax Incentives Program for the past 40 years, starting in 1977–1978 with the first completed rehabilitation project to be certified by the NPS under the program. Finally, the report includes four case studies of HTC projects certified in FY 2017. The HTC program remains the Federal government's largest and most effective program supporting historic preservation and community revitalization.

Technical Preservation Services, National Park Service

September 2018

Executive Summary

Overview of the Rutgers Economic Analysis

The Federal Historic Tax Credit (HTC) is a Federal income tax credit that promotes the rehabilitation of income-producing historic properties. This study examines the economic impacts of the HTC (a 20% credit since 1986) by analyzing the economic consequences of the projects it supports. This analysis focuses on the economic effects of these projects during construction, quantifying the total economic impacts (i.e., direct as well as multiplier, or secondary, economic consequences) for Fiscal Year (FY) 2017, beginning October 1, 2016, and ending September 30, 2017, and for the period since the program's inception (beginning in FY 1978, with the certification of the first completed rehabilitation project under the program). The study utilizes the Preservation Economic Impact Model (PEIM), a comprehensive economic model development by Rutgers University's Center for Urban Policy Research for the National Park Service.

The current analysis applies the PEIM to both cumulative (FY 1978 through FY 2017) HTC-related historic rehabilitation investment (about \$144.6 billion in inflation-adjusted 2017 dollars) and single-year (FY 2017) HTC-related rehabilitation investment (about \$6.5 billion). It considers the effects of the cumulative \$144.6 billion rehabilitation investment as if it applied to one year (2017), rather than backdating the PEIM for each of the 40 years in the study period. It also considers the full rehabilitation investment associated with the HTC (e.g., \$6.5 billion in FY 2017), and not the somewhat lower amount reported by the National Park Service based on estimated qualified rehabilitation costs indicated by property owners requesting certification of rehabilitation for purposes of the tax credit (e.g., \$5.8 billion in FY 2017).1

PEIM results include many fields of data. The fields most relevant to this study include:

JOBS	Employment, both part- and full-time, by place of work, estimated using the typical job characteristics of each industry.
INCOME	"Earned" or labor income; specifically, wages, salaries, and proprietor income.
WEALTH	Value-added—the sub-national equivalent of gross domestic product (GDP).
OUTPUT	The value of shipments, as reported in the Economic Census.
TAXES	Tax revenues generated by the activity, which include taxes to the Federal government and to state and local governments.

The HTC has a multi-step application process, encompassing Part 1 (evaluation of the historic significance of the property), Part 2 (description of the proposed rehabilitation work), and Part 3 (request for certification of completed work). Both Part 2 and Part 3 rehabilitation statistics include only costs considered "eligible" or "qualified" for the tax credit under the Internal Revenue Code (Qualified Rehabilitation Expenditures, or QREs), as opposed to "ineligible" or "nonqualified" costs. While the ineligible/ nonqualified expenses do not count for tax credit purposes, they are a component of the total rehabilitation investment or cost borne by the HTC property owner. In practical terms, the total rehabilitation investment, including ineligible/nonqualified costs, helps pump-prime the economy. For example, in FY 2017, the Part 3 certified investment amounted to about \$5.8 billion, while the total rehabilitation outlay associated with the HTC was an estimated \$6.5 billion.

National Economic Impacts

The following table summarizes the impacts of the HTC in inflation-adjusted 2017 dollars for each of these economic measures for the cumulative period FY 1978-FY 2017 and for FY 2017.

	Federal HTC-Assisted Rehabilitation				
National Total Impacts 2017 \$ billion	\$144.6 billion CUMULATIVE (FY 1978–2017) ² historic rehabilitation expenditures results in:	\$6.5 billion ANNUAL FY 2017 historic rehabilitation expenditures results in:			
Jobs (person-years, in thousands)	2,548.0	106.9			
Income (\$ billion)	\$116.4	\$4.6			
Output (\$ billion)	318.0	12.2			
GDP (\$ billion)	158.1	6.2			
Taxes (\$ billion)	45.4	1.7			
Federal (\$ billion)	32.4	1.1			
State (\$ billion)	6.5	0.3			
Local (\$ billion)	6.5	0.3			

The benefits of investment in HTC-related historic rehabilitation projects are extensive, increasing payrolls and production in nearly all sectors of the nation's economy. The cumulative effects for the period of FY 1978 through FY 2017 are illustrative. During that period, \$144.6 billion in HTC-related rehabilitation investment created 2,548,000 jobs and \$158.1 billion in GDP, about 30% of which (765,000 jobs and \$46.3 billion in GDP) was in the construction sector. This is as one would expect, given the share of such projects that require the employment of building contractors and trades. Other major beneficiaries were the service sector (465,000 jobs, \$20.9 billion in GDP), the manufacturing sector (532,000 jobs, \$41.5 billion in GDP), and the retail trade sector (369,000 jobs, \$11.4 billion in GDP). As a result of both direct and multiplier effects, and due to the interconnectedness of the national economy, sectors not immediately associated with historic rehabilitation, such as agriculture, mining, transportation, and public utilities, benefit as well. (Exhibit 2.2).

The most recent economic benefits of the Federal HTC are also most impressive. In FY 2017, HTC-related investments generated approximately 107,000 jobs, including 38,000 in construction and 24,000 in manufacturing, and were responsible for \$6.2 billion in GDP, including \$2.0 billion in construction and \$1.8 billion in manufacturing. HTC-related activity in FY 2017 generated \$4.6 billion in income, with construction (\$1.7 billion) and manufacturing (\$1.1 billion) reaping major shares. (See Exhibit 2.1 for more details.)

² Changes in the official annual reported rates of inflation caused the Rutgers research team to make various changes in the calculations concerning the economic impacts of the impacts of the HTC over time. The changes are particularly notable over the past few years when job counts ensuing from the HTC had to be adjusted.



R. J. Reynolds Tobacco Company Building (now The Kimpton Cardinal Hotel and The Residences at the R. J. Reynolds Building), Winston-Salem, NC, Photos: Clear Sky Images

The HTC National and State Economic Impacts

A breakdown by state of the national economic benefits, both for FY 2017 and cumulatively for the last five fiscal years, shows the benefits of the program on the national economy. (See Exhibits 1.1 and 1.2)

HTC-related historic rehabilitation benefits state economies as well as the national economy. For example, in New York State in FY 2017, Federal HTC-related rehabilitation activity totaled about \$1.138 billion. The national impacts of that investment included 18,818 jobs, an additional \$2.141 billion in output, \$811 million in income, \$1.083 billion in GDP, \$196 million in Federal taxes, and \$332 million in total taxes. In New York alone, the same \$1.138 billion in HTC-related spending resulted in 10,750 jobs, \$1.136 billion in output, \$505 million in income, \$623 million in gross state product (GSP), and \$183 million in total taxes.

HTC Impacts Compared with those of Non-Preservation Investments

How does HTC-related historic rehabilitation perform as an economic pump-primer compared with other, non-preservation investments? In short, quite well.

Numerous studies conducted by Rutgers University have shown that in many parts of the country, a \$1 million investment in historic rehabilitation yields markedly better effects on employment, income, GDP, and state and local taxes than an equal investment in new construction or many other economic activities (e.g., manufacturing or services). These findings demonstrate that historic rehabilitation, combined holistically with the many activities of the broader economy, delivers a commendably strong "bang for the buck."

The Cost of the HTC

The HTC is a tax expenditure and has a public cost. In the simplest terms, the Federal cost of the HTC is equal to the credit percent (20% since 1986) applied to the Part 3 ("qualified for tax credit") estimated investment.³ Applying that calculation, the Federal HTC costs the U.S. Treasury approximately \$27.5 billion (in inflation-adjusted 2017 dollars) over the period of FY 1978 through FY 2017, while the cost for projects certified by the National Park Service in FY 2017 alone was about \$1.165 billion.⁴ Weighing against these costs are the significant economic impacts (i.e., jobs, income, GDP, and output) and tax revenue (Federal, state, and local) generated by HTC-aided rehabilitations and documented in this study. An important finding is that the HTC yields a net benefit to the U.S. Treasury, generating \$32.4 billion in Federal tax receipts over the life of the program, compared with \$27.5 billion in credits allocated.

³ See footnote 1, on page 2.

⁴These estimates are based on the full utilization of the credits in cases of certified rehabilitations. For various reasons, not all completed projects certified by the National Park Service may ultimately utilize the credit. Their economic impact, nevertheless, remains.

Fiscal Year 2017 Highlights



\$6.5 billion

total in rehabilitation investment.

2017 POSITIVE IMPACTS on the national economy:
\$12.2 billion in output,
\$6.2 billion in GDP,
\$4.6 billion in income, and
\$1.7 billion in taxes, including
\$1.1 billion in Federal tax receipts.

500%	Projects in low- and moderate-income census tracts.*
JU /0	income census tracts.*

79% Projects in economically distressed areas.*

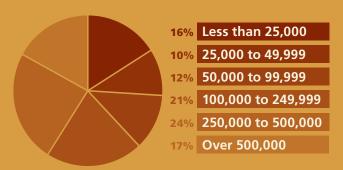
Projects in communities of less than 50,000 people.*

Projects by Community Size (Population)*



107,000

New jobs created and billions of dollars in total (direct and secondary) economic gains.



^{*}Courtesy of PolicyMap (County subdivision data, 2012-2016 U.S. Bureau of the Census American Community Survey, and New Markets

Tax Credit eligibility data (not including severe distress and non-metropolitan areas), U.S. Department of the Treasury, 2011–2015).

Fiscal Year 1978 — Fiscal Year 2017 Cumulative HTC Impacts

\$144.6 billion

in cumulative rehabilitation investment.

An inflation-adjusted (2017 dollars) \$27.5 billion HTC cost **encouraged a five times greater amount** of historic rehabilitation, \$144.6 billion.

cumulative Positive Impacts
on the national economy:
\$318.0 billion in output,
\$158.1 billion in GDP,
\$116.4 billion in income, and
\$45.4 billion in taxes, including

\$32.4 billion in Federal tax receipts.



2.5 million

New jobs created and billions of dollars in total (direct and secondary) economic gains.

These leverage and multiplier effects support the economic argument that the Federal **HTC** is a strategic investment that works.

Exhibit 1.1 Fiscal Year 2017

National Economic and Tax Impacts of Federal HTC-Related Investment by State

National Economic and Tax Impacts of Federal HTC-Related Investment by State									
	Total Rehabilitation	National Econ	•			Tax Impacts			
	Costs	Employment	(in 2017 \$ m	1	I	(in 2017 \$ r		ı	I
State	(in 2017 \$ millions)	(Jobs)	Income	GDP	Output	Local	State	Federal	Total
Alabama	\$44.5	822	\$28.2	\$53.1	\$73.1	\$0.8	\$1.2	\$6.8	\$8.8
Alaska	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Arizona	19.3	333	11.4	14.7	37.1	18.3	11.8	3.2	33.3
Arkansas	7.5	156	5.2	7.8	13.9	0.1	0.3	1.3	1.7
California	85.5	1,274	61.9	80.9	167.2	2.2	3.4	15.7	21.3
Colorado Connecticut	0.2 160.0	16	0.2 111.3	0.2 154.7	0.5 292.4	0.0 8.4	0.0	0.0 25.6	0.1 41.2
Delaware	15.0	2,288 238	10.6	14.4	292.4	0.7	7.1 0.7	23.6	3.8
District of Columbia	95.1	1,381	64.1	86.7	167.4	6.4	2.6	13.0	21.9
Florida	13.4	234	9.5	12.8	25.1	0.7	0.4	2.3	3.4
Georgia	50.0	985	34.6	50.9	91.3	2.4	2.3	8.4	13.1
Hawaii	1.1	15	0.7	1.0	1.9	0.0	0.0	0.2	0.2
Idaho	12.0	228	8.1	11.6	21.5	0.3	0.3	1.8	2.4
Illinois	420.0	6,192	305.8	394.6	820.3	13.3	12.1	73.6	99.0
Indiana	39.0	683	27.8	37.5	74.4	12.8	8.6	6.6	28.0
Iowa	269.9	4,877	182.8	272.8	474.8	9.0	8.0	42.3	59.4
Kansas	67.3	1,223	47.1	65.2	124.8	15.9	11.1	10.8	37.8
Kentucky	142.7	2,732	98.8	139.6	261.3	14.3	11.4	22.7	48.4
Louisiana	385.7	6,814	274.9	360.2	730.6	13.5	14.0	63.3	90.8
Maine	83.5	1,266	49.1	73.7	160.0	3.8	3.5	13.2	20.5
Maryland	85.3	1,318	59.9	80.6	158.3	2.8	2.5	13.7	18.9
Massachusetts	438.2	5,694	307.5	412.6	816.0	11.7	14.1	70.7	96.5
Michigan	176.3	2,802	124.9	167.4	332.7	5.2	6.4	29.1	40.7
Minnesota	360.5	5,678	253.1	341.0	673.2	12.7	14.3	58.1	85.1
Mississippi	1.8	36	1.2	1.7	3.2	0.1	0.1	0.3	0.5
Missouri	262.8	4,502	187.4	248.3	499.6	7.3	8.3	43.5	59.1
Montana	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Nebraska	13.4	258	9.2	13.3	24.0	2.8	1.9	2.1	6.8
Nevada	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
New Hampshire	1.1	16	0.7	1.0	2.0	0.0	0.0	0.2	0.2
New Jersey New Mexico	0.0	18	0.9	1.1	2.3	0.0	0.0	0.2	0.3
New York	1,137.5	18,818	810.5	0.0 1,082.5	0.0 2,140.5	0.0 73.7	0.0 62.5	0.0 195.5	331.7
North Carolina	86.2	1,615	60.7	86.4	161.5	2.1	3.0	14.7	19.8
North Dakota	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Ohio	488.7	8,778	348.0	481.5	928.0	21.2	17.9	84.8	123.8
Oklahoma	47.3	933	33.7	47.3	90.3	1.1	1.6	8.1	10.9
Oregon	9.7	172	7.1	9.3	19.0	0.3	0.3	1.7	2.3
Pennsylvania	367.7	5,977	266.9	353.8	717.0	12.3	10.4	64.7	87.4
Rhode Island	39.1	596	26.7	40.0	70.3	1.4	1.2	6.1	8.8
South Carolina	159.2	2,976	110.5	161.5	291.0	4.6	5.1	26.5	36.1
South Dakota	1.4	29	1.0	1.3	2.7	0.0	0.0	0.2	0.3
Tennesse	38.1	673	26.7	36.9	70.9	1.1	0.8	6.2	8.1
Texas	180.1	2,909	130.5	170.6	352.7	6.2	3.6	32.1	41.9
Utah	15.2	281	10.6	14.9	28.2	0.4	0.5	2.5	3.4
Vermont	10.2	181	7.4	9.7	19.6	0.4	0.5	1.7	2.6
Virginia	380.3	6,401	272.2	367.8	724.7	9.9	12.8	65.1	87.8
Washington	53.8	862	38.6	52.3	103.4	2.5	1.9	9.3	13.7
West Virginia	22.5	431	15.6	22.6	41.1	0.7	0.8	3.6	5.1
Wisconsin	180.9	3,149	128.2	176.3	339.9	6.4	7.3	30.5	44.2
Wyoming	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Totals	\$6,470.3	106,861	\$4,571.9	\$6,214.3	\$12,177.9	\$309.6	\$276.7	\$1,084.6	\$1,671.0

 $\textbf{SOURCE:} \ \textbf{Technical Preservation Services, National Park Service.} \ \textbf{Calculations by Rutgers University}.$

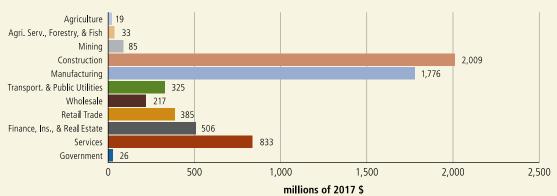
Exhibit 1.2 Cumulative Fiscal Years 2013–2017 National Economic and Tax Impacts of Federal HTC-Related Investment by State

	Total		omic Impacts			Tax Impact			
	Rehabilitation	ehabilitation costs Employment (conomic Impacts (in 2017 \$ millions)		(in 2017 \$ millions)			
	Costs			t				l	l=
State	(in 2017 \$ millions) \$140.7	(Jobs)	Income	GDP \$167.9	Output	Local	State	Federal	Total
Alabama	\$140.7 0.1	2,545	\$89.2 0.0	0.0	\$231.0 0.0	\$2.4 0.0	\$3.7 0.0	\$21.4 0.0	\$27.7 0.0
Alaska Arizona									
Arkansas	80.0 101.2	1,351 2,034	47.2 70.4	60.8 105.1	153.8 187.2	75.8 2.0	48.9	13.3 17.0	137.8 22.7
California	1,078.3	15,275	781.7	1,021.0	2,109.7	27.3	43.5	198.0	268.8
Colorado	134.8	8,297	95.0	131.9	253.9	3.4	43.3	22.5	30.3
Connecticut	467.3	6,576	325.2	452.1	854.3	24.5	20.9	74.8	120.3
Delaware	57.0	868	40.3	54.9	106.7	24.5	20.9	9.0	14.4
District of Columbia	196.3	2,783	132.3	179.0	345.5	13.2	5.3	26.8	45.3
Florida	188.2	3,174	133.0	180.1	352.4	9.7	5.8	31.8	47.4
Georgia	207.1	3,965	143.6	211.2	379.0	9.8	9.6	35.0	54.2
Hawaii	1.7	23	1.1	1.6	3.0	36.3	42.8	157.4	236.5
Idaho	12.2	231	8.2	11.8	21.8	0.3	0.3	1.8	2.4
Illinois	2,035.8	29,007	1,482.0	1,912.6	3,975.8	64.5	58.6	356.6	479.6
Indiana	238.2	4,065	170.2	229.1	454.6	78.5	52.3	40.4	171.2
Iowa	719.3	12,647	487.0	726.8	1,265.1	24.0	21.3	112.7	158.3
Kansas	271.1	4,760	189.6	262.5	502.5	63.9	44.6	43.6	152.1
Kentucky	335.0	6,275	232.0	327.6	613.5	33.4	26.6	53.3	113.6
Louisiana	1,507.5	25,830	1,074.7	1,407.8	2,855.7	52.6	54.7	247.3	354.7
Maine	306.8	4,508	180.4	270.9	588.0	14.0	12.9	48.6	75.4
Maryland	715.2	10,701	502.1	675.3	1,326.9	23.2	21.0	114.5	158.7
Massachusetts	1,796.6	22,570	1,260.7	1,691.5	3,345.5	48.0	57.8	289.9	395.8
Michigan	891.6	13,699	631.6	846.2	1,681.8	26.5	32.1	147.2	205.9
Minnesota	1,289.0	19,649	905.0	1,219.2	2,407.0	45.4	51.1	207.8	304.3
Mississippi	94.9	1,898	66.0	93.7	174.7	7.2	5.7	15.3	28.2
Missouri	1,783.3	29,426	1,271.9	1,685.0	3,390.8	49.4	56.3	295.4	401.0
Montana	25.6	476	17.8	25.1	47.0	0.9	0.9	4.0	5.9
Nebraska	236.2	4,342	161.4	233.4	422.3	48.8	33.4	36.5	118.6
Nevada	1.3	19	0.9	1.2	2.4	0.0	0.0	0.2	0.3
New Hampshire	86.7	1,262	60.4	84.0	160.6	3.3	1.2	13.9	18.4
New Jersey	500.1	7,000	354.9	466.9	950.2	9.8	14.7	81.8	106.5
New Mexico	40.8	743	28.9	39.6	76.9	1.8	1.8	6.6	10.2
New York	3,339.8	53,978	2,379.7	3,178.3	6,284.6	216.4	183.5	574.2	973.9
North Carolina	790.8	14,434	557.1	792.1	1,481.3	19.2	27.7	135.1	182.0
North Dakota	17.2	291	12.0	15.9	31.8	0.6	0.4	2.5	3.5
Ohio	1,693.8	29,651	1,206.1	1,668.8	3,216.5	73.5	62.0	293.9	429.2
Oklahoma	373.5	7,133	266.1	373.2	713.3	9.1	12.8	64.1	86.0
Oregon	151.7	2,608	110.2	144.5	295.5	4.0	5.2	26.5	35.7
Pennsylvania	1,650.3	25,885	1,198.0	1,588.1	3,218.1	55.0	46.6	290.6	392.3
Rhode Island	392.0	5,774	267.3	401.3	704.9	14.2	12.3	61.1	87.8
South Carolina	288.6	5,327	200.3	292.8	527.5	8.3	9.3	48.0	65.6
South Dakota	13.1	255	9.3	12.0	24.5	0.3	0.2	2.0	2.7
Tennesse	131.0	2,247	91.9	127.2	244.2	3.7	2.9	21.3	27.9
Texas	508.1	8,022	368.2	481.4	995.3	17.4	10.1	90.6	118.4
Utah	36.5	661	25.5	35.8	67.7	0.9	1.2	6.0	8.1
Vermont	114.3	1,957	82.8	108.6	219.3	4.4	5.6	18.6	28.8
Virginia	1,564.3	25,535	1,119.4	1,513.0	2,980.7	40.6	52.6	267.9	361.1
Washington	253.1	3,957	181.6	246.0	486.4	11.8	9.1	43.8	64.5
West Virginia	50.1	938	34.7	50.3	91.4	1.5	1.9	8.0	11.2
Wisconsin	434.2	7,357	307.6	423.0	815.8	15.4	17.5	73.1	106.1
Wyoming	6.1	121	4.6	6.6	12.2	0.4	0.3	1.3	1.9
Totals	\$27,348.5	442,132	\$19,367.2	\$26,234.9	\$51,650.8	\$1,299.0	\$1,200.0	\$4,753.2	\$7,253.0

SOURCE: Technical Preservation Services, National Park Service. Calculations by Rutgers University.

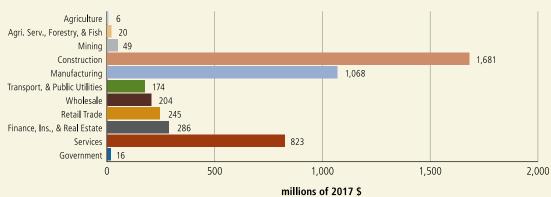
Gross Domestic Product by Sector from Federal Historic Preservation Investment

\$6,214 million, FY 2017



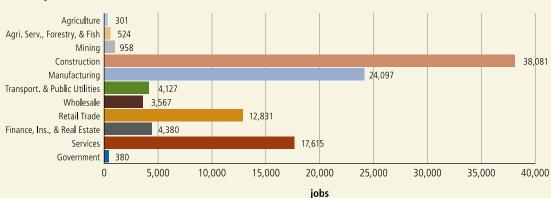
Income Created by Sector from Federal Historic Preservation Investment

\$4,572 million, FY 2017



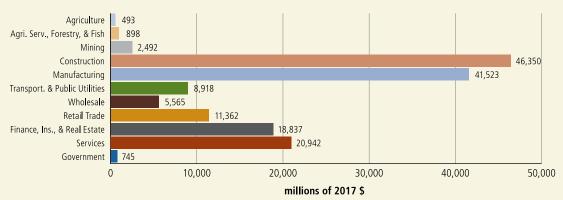
Jobs Created by Sector from Federal Historic Preservation Investment

106,861 jobs, FY 2017



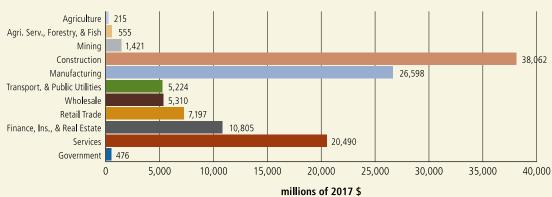
Gross Domestic Product by Sector from Federal Historic Preservation Investment

\$158,124 million cumulative, FY 1978-2017



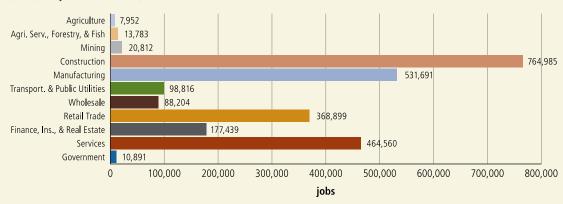
Income Created by Sector from Federal Historic Preservation Investment

\$116,353 million cumulative, FY 1978-2017



Jobs Created by Sector from Federal Historic Preservation Investment

2,548,033 jobs cumulative, FY 1978-2017



Zeigler's Drug Store/Allen's Hall Florence, South Carolina

PROJECT PROFILE

Historic Name: Zeigler's Drug Store/Allen's Hall Current Name: Town Hall Restaurant/Kress Corner

Original Construction Year: 1876

Original Use: General Merchandise Store, Drug Store, and

Community Gathering Place

Rehabilitation Completed: 2017 New Use: Restaurant and Office Space

Total Project Cost: \$3,839,986

Federal Historic Tax Credit Equity: \$634,262 State Historic Tax Credit Equity: \$569,483

SC Abandoned Building Tax Credit Equity: \$569,483

City Grants/Incentives: \$629,905



Photo courtesy: Ken Jackson

ECONOMIC IMPACT ON FLORENCE

"The Zeigler's Drug Store historic rehabilitation into the Town Hall restaurant and upper-level office space is a key component that breathed new life into downtown Florence. The project provided momentum, attention and foot traffic to the development company's neighboring apartment and rooftop bar historic redevelopment on the same block. Together with a handful of other historic tax credit redevelopments, a downtown renaissance is taking place in Florence. These historic projects are catalyzing investment and future development. Downtown Florence is becoming a regional destination, attracting both locals and travelers from the interstate, to the downtown area, for a unique but authentic experience."

 Ray Reich, Florence Downtown **Development Director**

History and Downtown Context

This two-story, brick, corner building, constructed in 1876, features arched windows, a decorative band of corbeling, and a distinctive parapet. It was originally a general merchandise store operated by James Allen. On the second floor, Allen established Florence's first civic gathering spot, Allen's Hall, as it quickly became known. At one time the building also served as the office of a local newspaper. The YMCA, the Masonic Lodge, religious and political groups all met at Allen's Hall, and it was also the scene of weddings and other community celebrations.

Devastating fires in both 1893 and 1896 gutted much of Florence's commercial district. Although this building was damaged, it was not destroyed, and it was rebuilt serval years later, at which time Zeigler's Drug Store was established. Pharmacist R.H. Zeigler, who also served as Mayor of Florence, operated the drug store for more than 50 years. People gathered here every Saturday to listen to Pete Thornell's live, Super X radio broadcast on WOLS.

Like many towns across the country in the last decades of the twentieth century, Florence's downtown commercial district fell victim to suburban shopping malls. During this period a variety of tenants occupied the building, some of whom made alterations to the facade to "modernize" it, such as covering the building in pink stucco and replacing the arched windows with larger, rectangular ones. Eventually the building fell into complete disrepair and was vacant for many years until a group of local developers acquired it and several neighboring buildings in 2013.



Photo: Lucas Brown, Kickstand Studio

Scope of Rehabilitation

After more than a year of planning, the New Florence Development Group began rehabilitation of the historic building. The stucco was removed to reveal the original brick façade that was repaired where necessary, cleaned, and restored. The original arched window openings were restored, and on the first floor the still extant cast-iron columns at the corner entrance were preserved and the storefront recreated based on historic documentation. On the interior, original pressed metal ceiling panels, hardwood floors, doors, and counters were refurbished. The lower level of the building was converted into Town Hall, a 5,800-square-foot restaurant, which specializes in serving locally grown ingredients and also has a large wood burning grill. The second level is occupied by a large real estate firm

Role of the Historic Tax Credit

According to the developer, the cost of renovating the historic Zeigler's Drug Store, in comparison with the local rental market, would have been too risky. The tax credit equity was critical to the financing of the project. Equity investors were attracted to partner in the project by the ability to use the Federal HTCs, South Carolina HTCs and the South Carolina Abandoned Building Credit to offset their corporate tax liability.

PROJECT BUDGET

Sources of Funds	Amount
Bank Loan	\$1,320,256
Federal Historic Tax Credit Equity	\$634,262
State Historic Tax Credit Equity	\$569,483
SC Abandoned Building Tax Credit Equi	ty \$569,483
City Grants/Incentives	\$629,905
Developer Equity	\$116,597
Total	\$3,839,986

Uses of Funds	Amount
Acquisition Costs	\$200,000
Construction Costs	\$2,569,345
Soft Costs	\$372,641
Deferred Developer Fee	\$698,000
Total	\$3,839,986

CASE STUDY #2

Equitable Life Insurance Company of Iowa Des Moines, Iowa





Photos: Mirza Kudic

PROJECT PROFILE

Historic Name: Equitable Life Insurance Company

of Iowa Building

Current Name: The Equitable Building

Original Construction: 1924

Original Use: Insurance Company Headquarters

Rehabilitation Completed: 2016

New Use: Residential and Commercial

Total Project Cost: \$38,627,762

Federal Historic Tax Credit Equity: \$6,251,283

State Historic Tax Credit Equity: \$6,483,563

History and Downtown Context

The Equitable Building was constructed as the headquarters of the Equitable of Iowa Insurance Company. Built in 1924, the 19-story building stood for 49 years as the tallest building in Iowa. The Gothic Revival-style building's outstanding feature, the rooftop lantern, with elongated arched windows, terra-cotta ornament, and a spire-like roof, is prominent in the Des Moines skyline. The Equitable Building was named one of the "50 Most Significant Iowa Buildings of the 20th Century" by the Iowa chapter of the American Institute of Architects. The last large-scale retailer, which had been in the building since its opening 83 years before, vacated the building in 2007. Foutch Bros. and Block Real Estate purchased the property in 2012 out of foreclosure and began rehabilitation of the iconic building.

Scope of Rehabilitation

The rehabilitation created 146 residential rental units on the upper floors and 26,000 square feet of commercial space on the first two floors. The building houses a Pot Belly Sandwich Shop, an office for an engineering company, a cell phone store, and other offices. On the exterior, the masonry was repaired and cleaned, and the entrance lobby with its original marble walls, staircase and floors, ribbed ceiling, and light fixtures was restored. The interior of the building was updated with new mechanical, electrical and plumbing systems. All the apartment units, which feature nine-foot-tall ceilings, have granite kitchen countertops, restored original terrazzo floors, and ceiling fans. Community amenities include a fitness room, community room, storage lockers, and a large rooftop patio, sometimes used for events and concerts. The building also provides direct access to the downtown skywalk on the second floor.





Role of the Historic Tax Credit

Given the level of risk associated with rehabilitating the Equitable Building, the developer acknowledges the project would not have moved forward without the use of historic tax credits. Because of the deteriorated condition of the building and the needed remediation of hazardous materials and fire damage, without leveraging upfront equity through the state and Federal historic tax credits the project would not have been financially feasible.

Economic Impact, Downtown Des Moines

The rehabilitation of the Equitable Building has had a noticeable economic impact on downtown Des Moines. The use of historic tax credits allowed the developer to transform a building, underutilized or vacant for almost a decade, into a vibrant place for hundreds of people to reside and work. The apartments in the rehabilitated building are in high demand in the multi-family rental market in downtown Des Moines. The rooftop is a popular gathering place for residents and the resurgence of foot traffic around the 600 block of Locust Street during and after business hours, as a result of the rehabilitation of the Equitable Building and other nearby historic buildings, is a catalyst for small businesses and other redevelopment in the neighborhood.

PROJECT BUDGET

Sources of Funds	Amount
Bank Loan	\$19,694,500
Enterprise Zone Tax Credit Investment	\$1,565,777
Sales Tax Refund	\$589,257
Federal HTC Equity	\$6,251,283
State HTC Equity	\$6,483,563
Developer Equity	\$2,302,442
Deferred Developer Fee	\$1,740,940
Total	\$38,627,762

Uses of Funds	Amount
Working Capital and Reserves	\$1,132,263
Acquisition	\$1,872,522
Hard Costs	\$26,572,312
Soft Costs	\$4,960,665
Developer Fees	\$4,090,000
Total	\$38.627.762

Owyhee Hotel Boise, Idaho

PROJECT PROFILE

Historic Name: The Owyhee Hotel

Current Name: The Owyhee
Original Construction: 1910
Rehabilitation Completed: 2016

Original Use: Hotel

New Use: Mixed Use - Residential, Retail, Office, Commercial

and Event Space

Total Project Cost: \$22,205,000 Federal HTC Equity: \$2,250,000

Local Redevelopment Agency Credits: \$775,000



Photos: Laure Joliet

History and Downtown Context

The Owyhee Hotel was well known regionally and a familiar resting place for travelers between Seattle, Portland, and Salt Lake City in the early part of the twentieth century. Located in the Lower Main Street Commercial Historic District in downtown Boise, the Owyhee's rooftop garden was a popular gathering place, and the ballroom, which could accommodate up to 300 persons, was a favorite location for large gatherings, weddings, and special events. The Owyhee was part of the wave of development in downtown Boise that resulted after the construction of the Oregon Short Line rail passenger and freight depot and the establishment of the Rapid Transit Company, which opened a street car line on Main Street in 1891.

The architectural firm of J.E. Tourtellotte and Company was retained for the design of the Owyhee and was later joined by R.T. Newberry of Chicago, a consultant with expertise in hotel design. The six-story Owyhee, with a brick and stone exterior, locally pioneered the use of the steel-frame construction and was credited with having inaugurated the "skyscraper era" in Boise. Until it was purchased by developers, Local Construct & Clay Carley, the Owyhee languished. It was converted to office and commercial space in the 1970s but operated at a fraction of its potential and sat mostly vacant.

Scope of Rehabilitation

When Local Construct & Clay Carley acquired the building with the intent of rehabilitating it for residential use, the interior had been significantly altered in the 1970s remodeling of the hotel for new use. A goal of the rehabilitation was to uncover and restore as much as possible of the historic character, materials, and fixtures that had been diminished or covered by the prior remodeling. The rehabilitation work on the exterior included: restoring the historic sandstone that distinguishes the ground level of the building, installing a compatible new storefront based on historic photographs, replacing the windows that were too deteriorated to repair with compatible new ones, and reopening those windows that had been bricked in previously. Early in the project, during the removal of the 1970s interior alterations, historic features were uncovered, including original tiling, ornate columns in the hotel lobby, and a fireplace previously enclosed in drywall. All these features were retained and repaired as part of the rehabilitation, which converted the former hotel into 36 apartments, office, retail and commercial spaces, and a new ground-floor restaurant. The completed rehabilitation is a building with a beautiful exterior that reflects the Golden era of Boise's past and an interior that retains key historic features, while integrating contemporary needs and finishes, and that projects a bright future for Boise.





Use of the Historic Tax Credit

The historic tax credit was instrumental in the economic viability of the Owyhee rehabilitation. Without the historic tax credit, it is unlikely the ownership group would have undertaken a project with such uncertainty and risk. For example, during the rehabilitation, the owner discovered that each floor was layered with asbestos, an original fireproofing treatment, which allowed the hotel to be advertized as "entirely fireproof" when it first opened. This hazardous material had to be removed at considerable expense. Many unforeseen challenges like this are common in the rehabilitation of older buildings, which can often significantly increase the cost and risk. Without the historic tax credit, such unexpected costs might not have been covered by the project budget.

Economic Impact on Boise

Located in the west end of downtown, the hotel was in an area that had experienced little new investment in recent decades and was surrounded by many underutilized and undeveloped properties. The rehabilitation of the Owyhee, however, has enlivened this area and spurred significant new investment by neighboring property owners. Nearby, two 3-star hotels have opened and a new residential condominium project has been completed. In addition, an office complex has been proposed only a few blocks away. In total, the area has experienced over \$100 million of new investment since construction began on the rehabilitation of the Owyhee in 2014.

Not only has The Owyhee itself regained its stature as a premier community gathering space, but because it is now "home base" to Treefort Music Fest, a five-day music festival, it attracts more than 30,000 visitors and 400 bands to the city each year. The start-up technology firms, financial institutions, and other businesses that occupy office space in The Owyhee, and a restaurant that serves the downtown business community, also contribute to the resurgence of downtown Boise.

PROJECT BUDGET

Sources of Funds Amount
Limited Partner Equity \$7,500,000
Bank Construction Financing \$11,680,000
Federal Historic Tax Credit Equity \$2,250,000
Local Redevelopment Agency
Credit Equity \$775,000
Total \$22,205,000

Uses of FundsAmountAcquisition Costs\$3,550,000Direct Construction Costs\$16,000,000Indirect Construction Costs\$2,355,000Financing Costs\$300,000Total\$22,205,000

Houma Elementary School Houma, Louisiana





Photos: Michael Palumbo Photography

PROJECT PROFILE

Historic Name: Houma Elementary School **Current Name:** Academy Place Apartments

Original Construction Year: 1931
Year Rehabilitation Completed: 2017
Original Use: Elementary School

New Use: Mixed-Income Senior Housing

Total Project Cost: \$19,739,366

Federal Historic Tax Credit Equity: \$1,953,908 State Historic Tax Credit Equity: \$2,028,025

Bank Loan: \$2,700,000 LIHTC Equity: \$7,406,550

Terrebonne Parish Council on Aging: \$5,500,000

History and Context

Constructed in 1931, Houma Elementary School last welcomed students in 1970, and then housed school district administrative offices until 2014. School officials conveyed the vacant building to the Terrebonne Parish Consolidated Government, which issued an RFP for redevelopment of the property. Renaissance Neighborhood Development Corporation (RNDC) was selected to rehabilitate the property into much-needed mixed-income housing for seniors. The New Orleans-based RNDC is a non-profit affordable housing developer and a collaboration between Volunteers of America National Services and Volunteers of America, Southeast Louisiana.

Scope of Rehabilitation

The 103-unit rehabilitation project consisted of converting the school into 47 apartments, and constructing 56 new apartments in a compatible new addition at the rear of the property. The original nine-over-two windows were retained and repaired as part of the conversion of the building into apartments. The apartments were sensitively incorporated into the former classrooms that still have the original 11-foot-high ceilings. Important character-defining interior features and spaces were retained, most notably the corridors with their distinctive beaded-board wainscoting, over-the-door transoms, and glazed windows that supply borrowed light into the corridors. Historic stairs were retained, as well as the historic wood floors throughout the building. Mature live oak trees remain and highlight the site's new landscaping.



Role of the Historic Tax Credit

The Federal historic tax credit was crucial to the success of the rehabilitation project. The state historic tax credit also figured prominently, as did the other sources of funding from Low-Income Housing Tax Credits (LIHTC), Terrebonne Council on Aging, Volunteers of America, and private bank loans. The developer, Renaissance Neighborhood Development Corporation (RNDC), referring to the importance of the historic tax credit to the outcome of the project, stated "We believe each project has its own opportunity to create a special living experience not found in the typical market for affordable or even market-rate housing. With its wonderful historic character and features, Academy Place provides such an experience, and is very much appreciated by the residents."

Economic Impact on Houma

The development of Academy Place Apartments has been a boon to the community, which was severely lacking in available senior housing. The project has returned a vacant building once again to active use in the Houma community. Several former teachers and students have come back to live in their old school and, like their fellow residents, enjoy the convenience and the walkability of the neighborhood, which is close to downtown Houma. The building is now individually listed in the National Register of Historic Places and has been returned once again to active use in the community. The project is also Enterprise Green Communities-certified.

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Sources of Funds	Amount
Bank Loan	\$2,700,000
LIHTC Equity	\$7,406,550
Federal HTC Equity	\$1,953,908
State HTC Equity	\$2,028,025
Volunteers of America	\$25,000
Developer Equity	\$125,883
Terrebonne Parish Council on Aging	\$5,500,000
Total	\$19.739.366

Uses of Funds	Amount
Acquisition Costs	\$16,366
Construction	\$14,892,956
Equipment	\$205,871
Soft Costs	\$3,315,075
Subtotal	\$18,430,268

	\$ 10, 150, <u>1</u> 50
Financing and Perm Loan Costs	\$717,386
Total Tax Credit, Syndication Costs and Reserves	\$ \$591,712
Total Development Costs	\$19,739,366

RUTGERS

Edward J. Bloustein School of Planning and Public Policy

Edward J. Bloustein School of Planning and Public Policy Rutgers, The State University of New Jersey Civic Square Building, 33 Livingston Avenue New Brunswick, NJ 08901 848-932-5475 http://bloustein.rutgers.edu/ ejb@policy.rutgers.edu



Technical Preservation Services
National Park Service
U. S. Department of the Interior
Washington, DC 20240
https://www.nps.gov/tps/

September 2018





TO: Rep. Tom Brower, Chair

Rep. Scot Z. Matayoshi, Vice Chair

Committee on Housing

FROM: Kiersten Faulkner, Executive Director

Historic Hawaii Foundation

Committee: Tuesday, February 12, 2019

10:15 a.m.

Conference Room 423

RE: HB 1533, Relating to Historic Preservation

On behalf of Historic Hawaii Foundation, I am writing in **support for the intent of HB 1533**, with additional comments and recommendations. The bill would establish a historic preservation tax credit for qualified construction expenses incurred in rehabilitation of historic structures that produce affordable housing units.

Preserving and appropriately using historic buildings are ways to enhance community character, provide affordable housing, provide an alternative to sprawl, create jobs, encourage heritage tourism, and generally spur economic development in older neighborhoods and commercial districts. Historic preservation tax credit programs have proved to be successful incentives for rehabilitating older structures and returning them to useful life.

HB 1533 is a good step in the right direction to provide this important incentive to developers, property owners and financial institutions involved in preserving historic buildings and providing affordable housing. HHF feels that it would be even more effective to extend the tax credit incentive to any qualified expenses incurred in the certified rehabilitation of a historic structure, and not limit it only to affordable housing developments. HHF recommends that a 25% tax credit be offered to any qualified historic preservation project, and offer a 30% tax credit for those that provide affordable housing.

HHF recommends the following edits to HB 1533:

- Lines 8-9: delete "resulting in the creation or rehabilitation of affordable housing units"
- Line 14: after "Twenty-five per cent of the qualified expenses" add "incurred in the certified rehabilitation of a certified historic structure"
- Line 15: after "Thirty per cent of the qualified expenses" add "resulting in the creation or rehabilitation of affordable housing units"

Tax credit programs for rehabilitation of historic properties have been used at the federal level and by almost two-thirds of the States. Some 31 states have adopted laws creating credits against state taxes to provide incentives for the appropriate rehabilitation of historic buildings. While the details of the programs vary state by state, preservation tax credits have universally been shown to be effective, especially when coupled with the 20% federal historic tax credit available to income-producing historic properties.

National studies have found that historic rehabilitation tax credits spurred economic development and increased direct tax revenues that offset the tax credit expense. Through increased economic output, the state recovers its investment in rehabilitation tax credits through four sources: construction period taxes, real property taxes, post-construction sales and income taxes. HB 1533 would have the additional community benefit of incentivizing affordable housing.

Most programs include the following basic elements: Criteria establishing which buildings qualify for the credit; Standards to ensure that the rehabilitation preserves the historic and architectural character of the building; A method for calculating the value of the credit awarded, reflected as a percentage of the amount expended on that portion of the rehabilitation work that is approved as certified rehabilitation; A minimum amount, or threshold, required to be invested in the rehabilitation; and a mechanism for administering the program, generally involving the state historic preservation office and the state department of taxation.

Many of the states that provide a historic preservation tax credit have conducted economic impact studies to determine the fiscal effect. All of them determined that the fiscal return was greater than the state's forgone taxes, often returning three to five times more revenue to the state in new taxes and significant new investment. The rehabilitation tax credit also was successful in creating new jobs, increasing loan demand and deposits in local financial institutions, enhancing property values and generating sales. In addition to these direct fiscal impacts, the tax credit also has proven benefits related to environmental sustainability, affordable housing, tourism and visitation, and neighborhood revitalization.

Since 1974, Historic Hawai'i Foundation has been a statewide leader for historic preservation. Its members and supporters work to preserve Hawaii's unique architectural and cultural heritage and believe that historic preservation is an important element in the present and future quality of life, economic viability and environmental sustainability of the state.

Therefore, Historic Hawai'i Foundation supports HB 1533, and recommends refinements as detailed above.

Submitted on: 2/8/2019 2:05:01 PM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Roxana Jimenez	North Shore Chamber of Commerce	Support	No

Comments:

Aloha Chair Brower,

On behalf of the North Shore Chamber of Commerce, I am writing in support for HB 1533. Preserving and appropriately using historic buildings are critical for supporting Hawaii's unique character and heritage. Historic preservation tax credit programs have proved to be successful incentives for rehabilitating older structures and returning them to useful life.

Thank you for the opportunity to comment.

Mahalo,

Roxana A. Jimenez





To: Honorable Tom Brower, Chair the House Committee on Housing

From: Lorraine Minatoishi, Ph.D., AIA

Hearing: 1st Hearing, Wednesday, February 12, 2019, 10:15am, Conference Room 423

Subject: Support for House Bill 1533, Relating to Historic Preservation

Dear Chair Tom Brower,

I am writing in **support of House Bill 1533**, which supports historic preservation in Hawaii.

I am an owner of an architectural firm in downtown Honolulu specializing in historic preservation. I have been an advocate for preserving our cultural heritage for over 20 years and have a Ph.D. in historic preservation. Through my research and professional work in this field, I have seen the positive impacts of preserving historic buildings. Not only do owners see the value, but also the public appreciates the effort it takes to resist the urge to demolish buildings that are "old". These older buildings preserve a town's character, feel and give it a sense of place.

The profession of "historic preservation" started in the early 1970s when the federal government created Section 106 of the National Historic Preservation Act and the Secretary of Interior's guidelines for preservation, as well as the Advisory Council on Historic Preservation that speaks directly with the President on historic preservation concerns. At that time, we as a nation agreed that we must protect our important cultural statements- buildings, sites, and landmarks that speak of our past. In the 1960s, America was undergoing huge post-war building boom and many of the early 1900 estates of the Vanderbilts, Rockefellers, and those who built America were being demolished. Two women in New York decided that laws had to be put in place to help curb demolition of important places, or very little of our past would remain. They succeeded on a federal level with establishing Section 106, and Hawaii followed suit by enacting Chapter 6E Hawaii Revised Statutes.

The economy of Hawaii is largely governed by tourism and the push to continually grow this economic engine is fierce. Small quaint one and two story bungalow hotels have been replaced with high-rise hotels. The quaint tiki bars and one story international market place of the past are now high-end shopping centers. The Waikiki of the 1960s is long gone, and what little was left has disappeared in the past few years. Not surprisingly, many tourists now go to Maui and Kauai to search for the "real" Hawaii, and it can still be found. In Feb. 6, 2019 Star-Advertiser newspaper, an article reads: "Kauai condo prices pop like fireworks." It will only be a matter of time before these islands, too, loose much of their past and much of their character. When this happens, where will tourists go?

It is in the interest of our economy to preserve our small towns, and important cultural artifacts. It is good for our people and it is good for our visitors. Hawaii is a very special place, and we must cherish our immigrant forefathers built in the early part of the 1900s.

House Bill 1533 does just that- it encourages homeowners and commercial owners to save what they have and to restore their buildings. Most other states have already enacted tax credit programs for preservation. Hawaii must also; otherwise all of our quaint old towns, our important sites, and our residential neighborhoods will be altered beyond recognition. In Hawaii, historic preservation today is seen as a negative for development. Developers run away from preservation like the plague. They don't see any benefit; rather they see it as an impediment to their projects. House Bill 1533 also provides a higher tax credit for projects with an affordable housing component so the benefit will be two-fold- those historic plantation homes can be rehabilitated and serve as housing for local homeowners.

In most other states, using preservation tax credits and saving the old structures are the only way to make projects pencil out. Tax credits are used as leverage to finance development projects with the banks. And these projects have rehabilitated decrepit areas outside of Portland, Seattle, and others areas, spurring economic growth. When economies slow down, these tax incentives make projects viable.

I support House Bill 1533 as it will help Hawaii's economy, its tourism, will create affordable housing units, and will help to preserve the Hawaii that we cherish. Please support House Bill 1533.

Sincerely,

Lorraine Minatoishi, Ph.D., AIA

<u>HB-1533</u> Submitted on: 2/11/2019 10:09:30 AM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Melodie Aduja	O`ahu County Committee on Legislative Priorities of the Democratic Party of Hawai`i	Support	No

Comments:

Submitted on: 2/7/2019 7:40:13 AM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing	
Susan Hatfield	Individual	Support	No	Ī

Comments:

I am writing in support for HB 1533. The bill would establish a historic preservation tax credit for qualified construction expenses incurred in rehabilitation of historic structures that produce affordable housing units.

Historic preservation tax credits have proven to be successful incentives to developers, property owners and financial institutions involved in preserving historic buildings and providing affordable housing. Preserving and appropriately using historic buildings are critical for supporting Hawaii's unique character and heritage. Historic preservation tax credit programs have proved to be successful incentives for rehabilitating older structures and returning them to useful life.

I urge you to provide this tax credit as another way to preserve Hawaii's heritage for our future generations.

Thank you for the opportunity to comment.

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Submitted on: 2/6/2019 7:24:42 PM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing	
Antya Miller	Individual	Support	No	

Comments:

Aloha Chair Brower and Committee Members,

I am the former Executive Director of the Haleiwa Main Street Program. During my employment we helped to or advocated to rehabilitate four historic buildings in Haleiwa, including the iconic Anahulu Bridge. We also rehabilitated the Haleiwa Mutual Telephone Building for our current office and North Shore Visitor Center, which is a typical two-bedroom home from the plantation era.

Through this experience I learned rehabilitation of existing buildings creates more economic development impact than new construction, creates jobs where the workers are so they don't have to commute, requires no new land be consumed, requires no new infrastructure, and there is less going into the landfill because the building is preserved. Most importantly, the unique character of the community is retained with the restoration of old buildings.

Our housing crisis requires creative solutions. This bill will help encourage housing rehabilitation as well as preserve our unique sense of place. Please vote for this bill.

Sincerely,

Antya Miller, Haleiwa

342-8557

Submitted on: 2/7/2019 8:29:02 PM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing	
Lois Langham	Individual	Support	No	Ī

Comments:

I am writing in support for HB 1533. The bill would establish a historic preservation tax credit for qualified construction expenses incurred in rehabilitation of historic structures that produce affordable housing units.

Historic preservation tax credits have proven to be successful incentives to developers, property owners and financial institutions involved in preserving historic buildings and providing affordable housing. Preserving and appropriately using historic buildings are critical for supporting Hawaii's unique character and heritage. Historic preservation tax credit programs have proved to be successful incentives for rehabilitating older structures and returning them to useful life.

Thank you for the opportunity to comment.

Submitted on: 2/8/2019 2:03:09 PM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing	
wendie mcallaster	Individual	Support	No	

Comments:

I strongly support for HB 1533. The bill would establish a historic preservation tax credit for qualified construction expenses incurred in rehabilitation of historic structures that produce affordable housing units.

Historic preservation tax credits have proven to be successful incentives to developers, property owners and financial institutions involved in preserving historic buildings and providing affordable housing. Preserving and appropriately using historic buildings are critical for supporting Hawaii's unique character and heritage. Historic preservation tax credit programs have proved to be successful incentives for rehabilitating older structures and returning them to useful life.

To: Rep. Tom Brower, Chair

Rep. Scot Z. Matayoshi, Vice Chair

Committee on Housing

From: Edmont P. D'Ascoli

Email: edas@hawaii.rr.com

Tel: 808-799-9135

Committee: Tuesday, February 12, 2019, 10:15a.m.

Conference Room 423

Re: HB 1533, Relating to Historic Preservation

I am writing in support of HB 1533. In 2016 I completed a restoration of a building in Chinatown, 75 N. King St., under the National Parks Service Tax Incentive Program. The tax credit enabled me to do a complete restoration including utility upgrades and emergency easement that were not available on the street front that allowed the fullest potential of the commercial property. With the Federal Tax Credit the project was not financially beneficial as an investment. My passion for historic buildings is what was the deciding factor. Other property owners may not have the same passion however with the State also providing a tax credit the project would have been worth it as a financial investment.

Below are the numbers from my project. In addition which is not stated are the resulting employment from businesses being able to operate from a restored property which would not have been able to accommodate before restoration.

\$ 4,000. GET approximately \$4,700 generated from before property purchased

After purchase of property

•	• • •
\$273,343.	Restoration materials/equipment
\$618,584.	Restoration professional services/labor
\$891,907.	Restoration total cost
\$ 38,330.*	Restoration GET
\$375,000.	Tenant Build-out materials/equipment
. ,	
\$225,000.	Tenant Build-out professional services/labor
\$600,000.	Tenant Build-out total cost
\$ 25,785.*	Tenant Build-out GET
\$ 5,035.	2017 GET from tenant's rent
\$ 13,393.	2018 GET from tenant's rent
\$128,185.	Tenant 2017 GET from operation sales
\$133,694.	Tenant 2018 GET from operation sales

- \$ 3,548.* Tenant 2017 GET from operation vendor purchases
- \$ 3,713.* Tenant 2018 GET from operation vendor purchases

\$351,683. Total GET generated in 3 years.

With the states 25% tax credit for commercial property the return on investment is quick and substantial with longevity. It is important that the tax credit to be taken in one fiscal year as an incentive to do a proper build-out. Historic areas are most challenging due to the conditions of the building, access, general area and in many historic areas lack of utilities.

I am currently restoring another property in the Capitol District with similar use and numbers. In my experience the GET and employment generated is not unique to one property but attainable with commercial properties within Historic Districts.

Sincerely Edmont P. D'Ascoli

^{*} Close Estimates.

To: Rep. Tom Brower, Chair

Rep. Scot Z. Matayoshi, Vice Chair

Committee on Housing

From: Mathew L. D'Ascoli

Email: mat@sunsetintl.com

Tel: 808-453-0803

Committee: Tuesday, February 12, 2019, 10:15a.m.

Conference Room 423

Re: HB 1533, Relating to Historic Preservation

I am writing in support of HB 1533. In 2016 our family completed a restoration of a building in Chinatown, 75 N. King St., under the National Parks Service Tax Incentive Program. The tax credit enabled us to do a complete restoration including utility upgrades and emergency easement that were not available on the street front that allowed the fullest potential of the commercial property. With the Federal Tax Credit the project was not financially beneficial as an investment. Our passion for historic buildings is what was the deciding factor. Other property owners may not have the same passion however with the State also providing a tax credit the project would have been worth it as a financial investment.

Below are the numbers from our project. In addition which is not stated are the resulting employment from businesses being able to operate from a restored property that would not have been able to accommodate before restoration.

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	117
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With the states 25% tax credit for commercial property the return on investment is quick and substantial with longevity. It is important that the tax credit to be taken in one fiscal year as an incentive to do a proper build-out. Historic areas are most challenging due to the conditions of the building, access, surrounding area and in many historic areas lack of utilities.

We am currently restoring another property in the Capitol District with similar use and numbers. In my experience the GET and employment generated is not unique to one property but attainable with commercial properties within Historic Districts.

^{*} Close Estimates.

Submitted on: 2/10/2019 4:57:54 PM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Jason Ito	Individual	Support	No

Comments:

This bill helps to protect and prolong the useful life of historic structures and provides an alternative funding source to create more affordable rentals. With housing so desparately needed, renovations are shorter in duration as compared to redevelopment projects. These types of incentives help to support property owners in keeping the charm and character of neighborhoods which are unique to Hawai'i. More affordable rentals located in high employment areas support the overall economy and provides broader options for all workers.

Submitted on: 2/12/2019 5:53:07 AM

Testimony for HSG on 2/12/2019 10:15:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Boyd Ready	Individual	Support	No

Comments:



Dear Representatives:

I support the effort to include historic property renovation in a tax credit arrangement related to 'low income' housing.

Historic properties' renovations and upgrades, sometimes called 'adaptive re-use,' often result in a higher proportion of labor costs, and lower proportion of materials costs, than new construction. Many of our historic buildings and residences can be adapted to low income housing, and should be.

The relentlessly destructive force of modern capitalism often wipes out anything old and replaces it with new, often a-historical and aesthetically neutral structures. Traditional building styles, forms, and functions are key to keeping Hawaii not just "fun in the sun," but a place of live history and culture as expressed in its built environment.

Please support this bill. It will help keep jobs in Hawaii, reduce materials imports, and assist everyone in living in a society with, not just an honored past, but a self-evidently honored one -- preserve our historic structures!

Boyd Ready

Haleiwa