Novogradac Journal of Tax Credits

News, Analysis and Commentary On Affordable Housing, Community Development and Renewable Energy Tax Credits

March 2013, Volume IV, Issue III

Published by Novogradac & Company LLP

Mixed-Use Project Brings Residents, Builds Community

By Jennifer Dockery, Associate Editor, Novgradac & Company LLP

RockPlaza Lofts will create a vibrant 24/7 community out of Newark, N.J.'s underutilized Four Corners historic district. Critics of the mixed-use project, however, often question him about the revitalization project's ability to draw people on days when the adjacent Prudential Center isn't hosting a concert or New Jersey Devils hockey game. Berson refutes critics by recounting a trip to Dinosaur Bar-B-Que, RockPlaza's flagship restaurant. On that Sunday during the National Hockey League lockout, families from the suburbs and Jersey City, as well as loft dwellers and workers from neighborhood businesses, filled the restaurant.

"There was a 20-minute wait on a Sunday night without a game. Dinosaur [Bar-B-Que] was a draw and it had nothing to do with game night whatsoever," Berson said. "You put the right combination at the right place and look what happens."

For Fidelco and Hanini, the right combination is a mix of retail, residential and office spaces in seven buildings, most of which date to the turn-of-the-century, at Newark's Broad and Market Streets, an intersection at the heart of the 26-block Four Corners historic district. The multiphase mixed-use Market Street and RockPlaza Lofts project features 34,000 square feet of retail space and more than 80 loft apartments.

"These activities are consistent with that drive to bring Newark back to its glorious past. To celebrate that, to preserve it seemed intriguing," Berson said. He expects the project to cater to the city's 280,000 residents, as well as those who commute to the city for work.

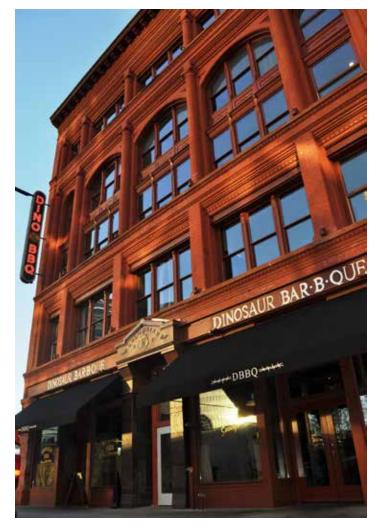


Photo: Courtesy of Fidelco Realty Group

The Columbian features a Dinosaur Bar-B-Que and 22 of the apartments.

continued from page 1



Photo: Courtesy of Fidelco Realty Group Fidelco Realty Group and Hanini Group have renovated historic buildings in Newark, N.J.'s Four Corners neighborhood

Fidelco and Hanini worked with Citi Community Capital, Greenline Ventures LLC and the state to fund the development. Citi and Greenline provided \$22 million in new markets tax credit (NMTC) authority to the project, in which Citi invested \$6.4 million. Citi also provided a \$15.5 million loan to the project. The New Jersey Economic Development Authority provided a \$5.4 million Economic Redevelopment and Growth grant. The developers also received \$5 million in historic tax credits (HTCs), which they plan to use to offset their tax liability.

"It's such a hub for transportation and commerce. We really did see the gem here," said Gina Nisbeth, director of Citi's municipal securities division. "We were motivated to get in to help with the revitalization of Newark," Nisbeth said. She added that Citi liked that the mixed-use project would increase foot traffic, revenue and jobs in the area. The project is expected to create 140 jobs.

Nisbeth said that funding the project was a challenge for the developer particularly because it came together at a time when most community development entities (CDEs) had already committed their allocation to other projects. Citi and Greenline have worked together in the past and we both agreed to combine allocation to help this high-impact project become a reality.

The project fit with Greenline's mission to invest in what Randy Kahn, Greenline's executive vice president, calls "shadow cities" or medium-sized cities located within larger cities' metropolitan areas. Greenline has made investing in these cities a priority. RockPlaza is helping to extend development from the Prudential Center.

Creating a Community

All of the buildings will feature rental apartments, convenience continued on page 3

Novogradac Journal of Tax Credits Editorial Board

PUBLISHER

Michael J. Novogradac, CPA

EDITORIAL DIRECTORAlex Ruiz

TECHNICAL EDITORS

Robert S. Thesman, CPA James R. Kroger, CPA Owen P. Gray, CPA Thomas Boccia, CPA Daniel J. Smith, CPA

ASSOCIATE EDITORJennifer Dockery

STAFF WRITERTeresa Garcia

CONTRIBUTING WRITERS

Peter Lawrence Sean B. Leonard Brandi Day Jieyi Cui Jim Kroger Jillian Toole Bryan Hung Cyle Reissig John Leith-Tetrault John M. Tess Frank Buss Dan Yonkin Yuri Horwitz Forrest Milder Tony Grappone

CARTOGRAPHERDavid R. Grubman

PRODUCTION

Alexandra Louie Jesse Barredo James Matuszak

Novogradac Journal of Tax Credits Information

Correspondence and editorial submissions: Alex Ruiz / 415.356.8088

Inquiries regarding advertising opportunities: Emil Bagalso / 415.356.8037

Editorial material in this publication is for informational purposes only and should not be construed otherwise. Advice and interpretation regarding the low-income housing tax credit or any other material covered in this publication can only be obtained from your tax advisor.



© Novogradac & Company LLP 2013 All rights reserved. ISSN 2152-646X

Reproduction of this publication in whole or in part in any form without written permission from the publisher is prohibited by law.

Novogradac Journal of Tax Credits Advisory Board

LOW-INCOME HOUSING TAX CREDITS

Bud Clarke BOSTON FINANCIAL INVESTMENT MANAGEMENT Jana Cohen Barbe **SNR DENTON** Tom Dixon **BOSTON CAPITAL** Rick Edson HOUSING CAPITAL ADVISORS INC. **Richard Gerwitz** CITI COMMUNITY CAPITAL Rochelle Lento DYKEMA GOSSETT PLLC John Lisella U.S. BANCORP COMMUNITY DEV. CORP. Phillip Melton **CENTERLINE CAPITAL GROUP Thomas Morton** PILLSBURY WINTHROP SHAW PITTMAN LLP Mary Tingerthal MINNESOTA HOUSING FINANCE AGENCY Rob Wasserman U.S. BANCORP COMMUNITY DEV. CORP.

PROPERTY COMPLIANCE

Michael Kotin KAY KAY REALTY Michael Snowdon MCA HOUSING PARTNERS\ Kimberly Taylor HOUSING DEVELOPMENT CENTER

HOUSING AND URBAN DEVELOPMENT

Flynann Janice **RAINBOW HOUSING** Ray Landry DAVIS-PENN MORTGAGE CO. Denise Muha NATIONAL LEASED HOUSING ASSOCIATION Monica Sussman NIXON PEABODY LLP

NEW MARKETS TAX CREDITS

Frank Altman COMMUNITY REINVESTMENT FUND Merrill Hoopengardner ADVANTAGE CAPITAL Scott Lindquist **SNR DENTON** Matthew Philpott U.S. BANCORP COMMUNITY DEV. CORP. Matthew Reilein JPMORGAN CHASE BANK NA **Ruth Sparrow** FUTURES UNLIMITED LAW PC Elaine DiPietro **ENTERPRISE COMMUNITY INVESTMENT INC.**

HISTORIC TAX CREDITS

Jason Korb **CAPSTONE COMMUNITIES** John Leith-Tetrault NATIONAL TRUST COMM. INVESTMENT CORP. Bill MacRostie MACROSTIE HISTORIC ADVISORS LLC John Tess HERITAGE CONSULTING GROUP

RENEWABLE ENERGY TAX CREDITS

Bill Bush **BORREGO SOLAR** Ben Cook SOLARCITY CORPORATION Jim Howard **DUDLEY VENTURES** Forrest Milder NIXON PEABODY LLP John Pimentel **FOUNDATION WINDPOWER**

continued from page 2

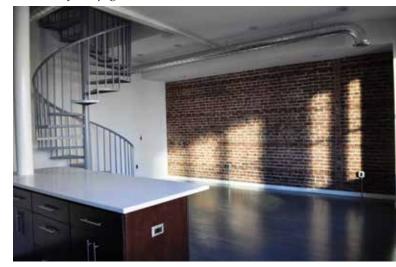


Photo: Courtesy of Fidelco Realty Group Units in RockPlaza Lofts feature exposed brick walls and other historic elements.

and specialty retail, office space, art galleries and restaurants. The development will include a police substation and offices for the Newark Development District, a City of Newark police department-affiliated nonprofit dedicated to enhancing safety in downtown Newark.

RockPlaza Lofts is bringing some of the first dwellings to the Four Corners neighborhood, which has been a business district since 1666. Eighty units will be considered workforce housing, with at least 16 units affordable to families earning at or below 80 percent of the area median income. Hanini and Fidelco felt that the area's access to public transportation, including Newark Penn Station, and proximity to several colleges and business centers made it a good fit for residential development.

"There's no question that proximity to public transportation was important," Berson said.

Reviving a Neighborhood

At press time, two buildings were open and one was partially open; the rest were in various stages of redevelopment.

The Bowers building, the first building renovated, opened in 2011. Built in 1890 as a commercial building, The Bowers is a thee-story dark-brick building that featured wood-framed ground floor storefronts with classic, medieval and Eastern-inspired motifs. The building was severely altered between 1916 and 1924. Fidelco and Hanini restored the building to its 1924 appearance. They restored its terra cotta façade and a historic rooftop billboard.

The developers updated the interior, converting it into 3,500 feet of ground floor retail and eight market-rate loft apartments. The Bowers includes studio, one bedroom and two bedroom units continued on page 4 continued from page 3

with stainless steel appliances, dishwashers, central air, 24-hour in-unit key access and maintenance, granite counter tops, rooftop decks, hardwood floors, walk-in closets and on-site laundry facilities. The apartments' interiors also feature a variety of unique amenities, such as exposed brick walls and skylights. At press time, the residential units were leased and Rita's Italian Ice had committed to a portion of the retail space.

The Columbian Block was completed in 2012. The property features windowed elevator lobbies that overlook Newark's Central Business District. The Columbian includes a turn of the century building and an addition. The 1890 building held a restaurant and a store was added in 1909. The building, which is of a larger scale than the surrounding buildings, features a molded brick façade that the developers were able to restore/preserve. They chemically matched the exterior colors, cleaned the copper entryway and restored the mosaic tile floors.

The Columbian features 22 loft apartments and retail space on the ground floor. Dinosaur Bar-B-Que is located in this building and includes materials that were reclaimed from other parts of the building, such as a 50-foot bar made of reclaimed wood joist, a reassembled tin ceiling and the face of a coal-burning furnace. The apartments are a mix of studio and one- and two-bedroom units. The apartments have amenities similar to those of The Bowers and include in-unit laundry machines.

A retailer, FASTSIGNS, has already moved into The Madison, but its residential units were still under construction at press time. Like The Bowers and The Columbian, The Madison's studio, one-bedroom and two-bedroom units will feature central air, stainless steel appliances and historic elements. The six-story building, which is at 216 and 218 Market Street, was constructed in 1890. By 1930, the upper floors of 216 had been converted into lofts. The building at 218 once housed a cocktail lounge and restaurant. The Madison features a pressed metal cornice and a lion's head motif.

"There's a character worthy of preservation and preserving history can be extremely positive for development," Berson said.

Fidelco and Hanini will complete the remaining buildings in the next few years.

"The best part about it is having a catalytic effect ... It's that additional attraction of potential interest in the neighborhood and moving it forward. It starts spreading the development out from the Prudential Center," Kahn said.

Nisbeth agreed. "[It's] the nature of Newark, there's a history and bright future there. I'm pretty proud of Citi's foresight to look to a community where the return on the investment may be down the road for all of us," Nisbeth said.

This article first appeared in the March 2013 issue of the Novogradac Journal of Tax Credits.

© Novogradac & Company LLP 2013 - All Rights Reserved

Notice pursuant to IRS regulations: Any U.S. federal tax advice contained in this article is not intended to be used, and cannot be used, by any taxpayer for the purpose of avoiding penalties under the Internal Revenue Code; nor is any such advice intended to be used to support the promotion or marketing of a transaction. Any advice expressed in this article is limited to the federal tax issues addressed in it. Additional issues may exist outside the limited scope of any advice provided — any such advice does not consider or provide a conclusion with respect to any additional issues. Taxpayers contemplating undertaking a transaction should seek advice based on their particular circumstances.

This editorial material is for informational purposes only and should not be construed otherwise. Advice and interpretation regarding property compliance or any other material covered in this article can only be obtained from your tax advisor. For further information visit www.novoco.com.