



Planning Successful Historic Tax Credit Rehabilitation Projects



Lafayette Building, Butler, PA

- Program overview
- Who uses the credit?
- Eligibility requirements
- Application and review process
- Best practices

Federal Historic Preservation Tax Incentives

Two types of credits available

10%
10%

Tax credit for the rehabilitation of non-historic buildings built before 1936 and used for non-residential income producing use

20%*
50%*

Tax credit for the "certified rehabilitation" of "certified historic structures"

Easements

Donation of specified property rights to protect a historic structure or site in exchange for tax benefits of a charitable deduction

Pennsylvania Historic Preservation Tax Credit



Tax credit for the "certified rehabilitation" of "certified historic structures"

Federal and State Program Similarities

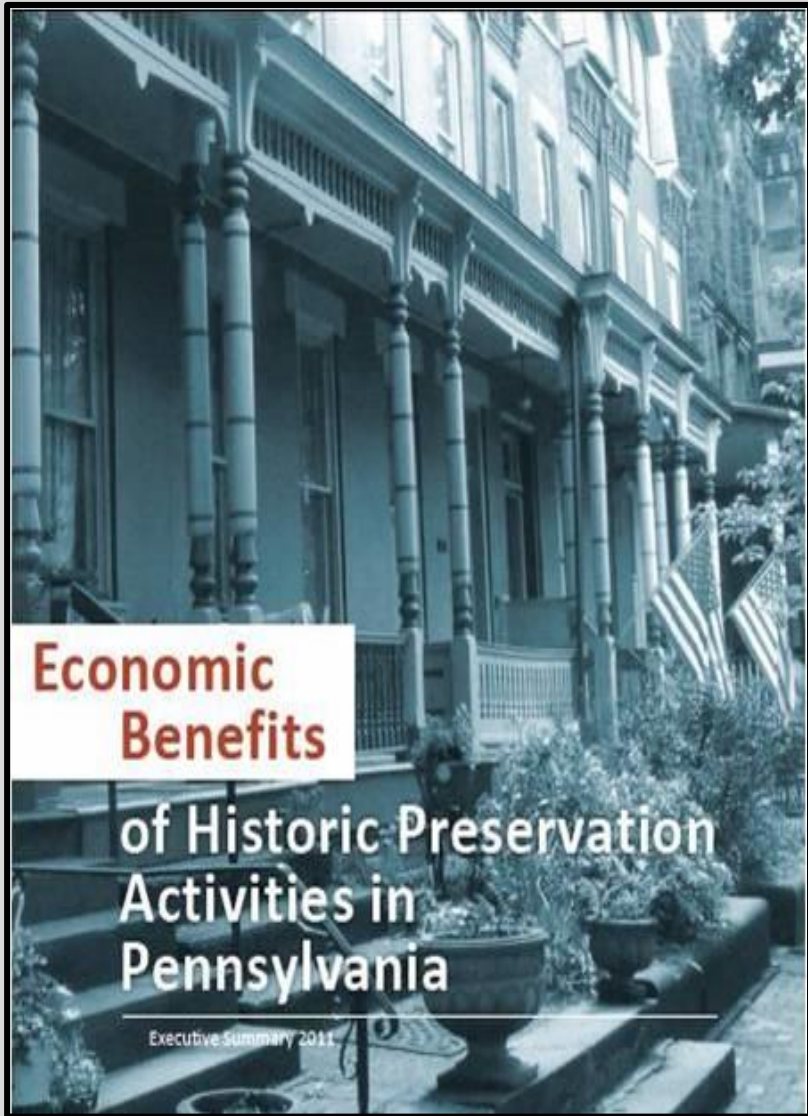
1. Use same eligibility requirements
2. Use IRS tax code
3. First point of contact is PA SHPO

Program Differences - State program is competitive!

1. State cap on total amount of credits - \$3M
2. State cap on credits per project - \$500,000
3. Federal is open application period, state period is limited
4. First-come, first served requirement
5. Regional distribution requirement
6. State is a "certificated" credit but "too little, too late, too slow"

*** Project does not need to "piggy-back" w/ NPS program**

Preservation and Economic Development Tool



- From 1977-2016, NPS certified over **42,000 completed projects** for total rehab costs of **\$84 billion**
- From 1977-2017, PA has over **2,500 completed projects** leveraging over **\$7 billion** in private investment
- In PA, FFY 2017 totals are:
 - **38 completed projects** for total rehab costs over **\$391 million** in private investment
 - **75 approved proposed projects** for an estimated **\$626 million** in private investment

Program Benefits

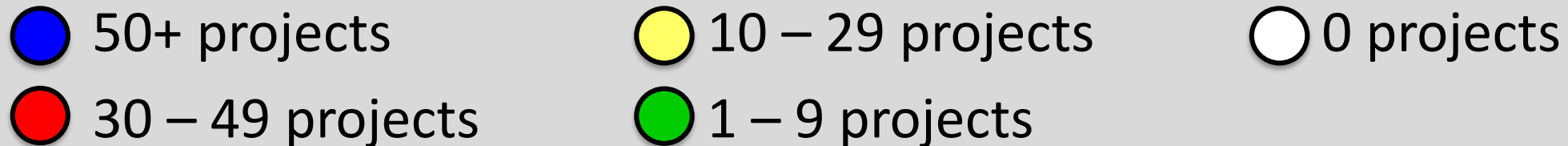
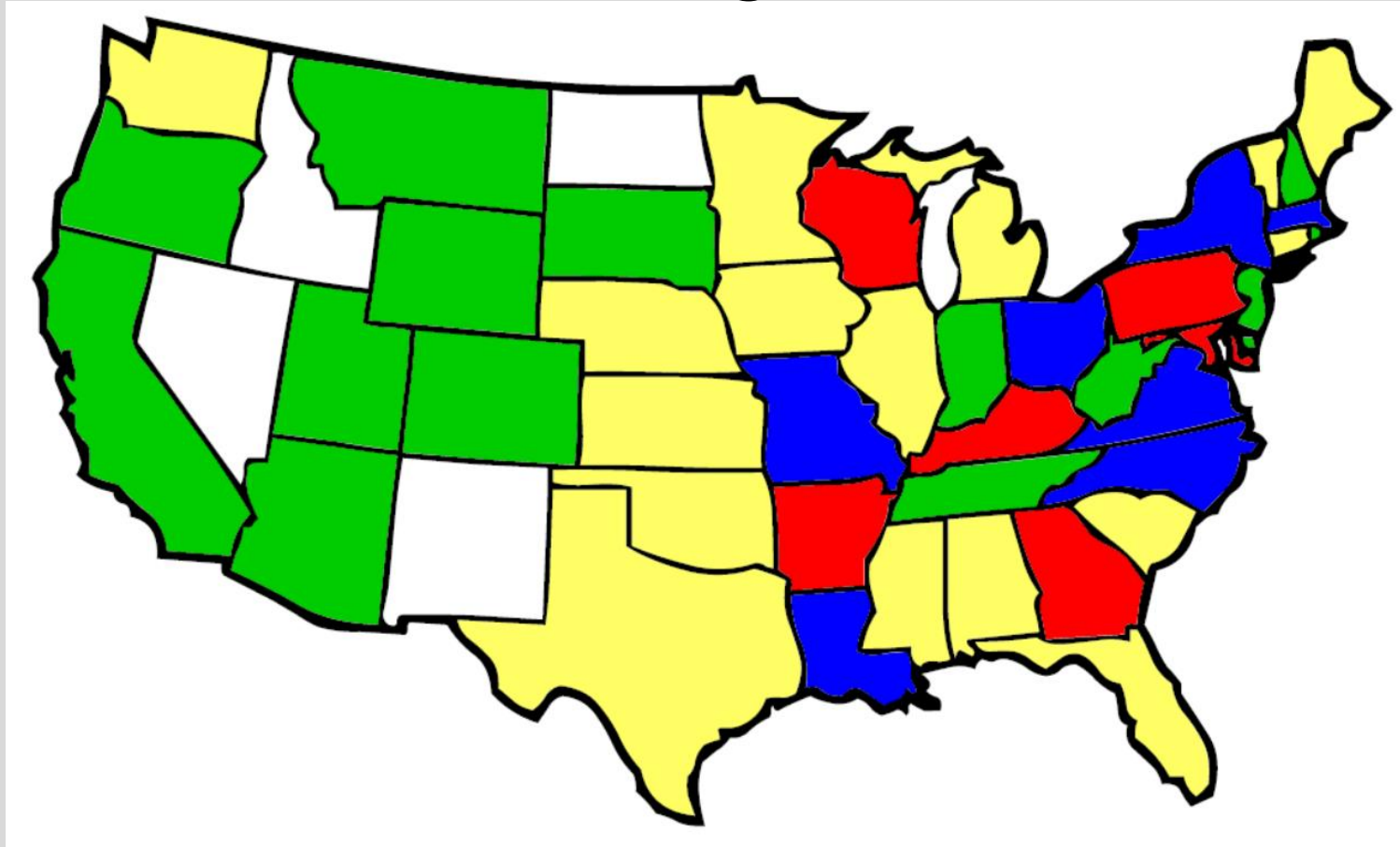


Cadillac Building, Bellefonte, Centre County

- Saves buildings
- Creates jobs
- Increases property values
- Promotes investment in older neighborhoods
- Stimulates other rehabilitation
- Attracts new residents
- Promotes smart growth

Approved Projects for FY 2015

1283 proposed projects representing \$6.6 billion in rehabilitation work





Who uses HTC in PA?

- Large, sophisticated developers
- Multi-million dollar rehab projects?
- Large office or industrial buildings?
- Only in Philadelphia and Pittsburgh?

Who does not use HTC in PA?

- Small property owners/developers?
- Rehab projects under \$500,000?
- Small cities and boroughs?
- Central Business District/Main Streets?
- Elm Street communities?

Data Source: National Park Service, 2017



- 613 approved projects
- \$3.8 billion in development costs
- 58,841 jobs created
 - 25,052 Construction
 - 33,789 Permanent
- \$4B in income generated
- \$837M in local, state and federal taxes

***Data Source: National trust for Historic Preservation and the Historic Tax Credit Coalition**

Factors that influence use of HTC*

- Timeliness?
 - Review process and incentive at end of project
- Knowledge of program or qualified consultant to help through process?
- Lack of owner access to investor capital?
- Standards for Rehabilitation
 - Difficulty to communicate/negotiate with NPS
- IRS regulations
 - Substantial Rehab Test
 - Ability to use credit/Syndication rules
- Preference for dealing with local/county officials and programs



Dickson Tavern/Kidder Wachter
Architecture & Design, Erie, PA

*John Leith-Tetrault, Public Policy Advisor, NTCIC - Main Street America article

Is there any hope???

Historic Tax Credit Improvement Act!

- Sponsored by Reps. Mike Kelly, R-Pa., and Earl Blumenauer, D-Ore.
- Encourages redevelopment of smaller, income producing properties by:
 - More projects in small, midsize and rural communities
 - Increase credit from 20% to 30% for projects less than \$2.5M
 - Allow one-time transfer of credit as tax certificate
 - Reduce investment level for Substantial Rehab/Basis Test from 100% to 50%
 - Flexibility for non-profit partnerships
 - schools, libraries, museums, theaters!



Manchester School No. 3,
Fairview, PA

Historic Preservation Tax Incentives



Partnership Program

The tax incentives program is administered in partnership by:

1. State Historic Preservation Offices (SHPOs)
 - In PA, SHPO is located in the Pennsylvania Historical and Museum Commission - the state's official history agency
2. National Park Service (NPS)
3. Internal Revenue Service (IRS)



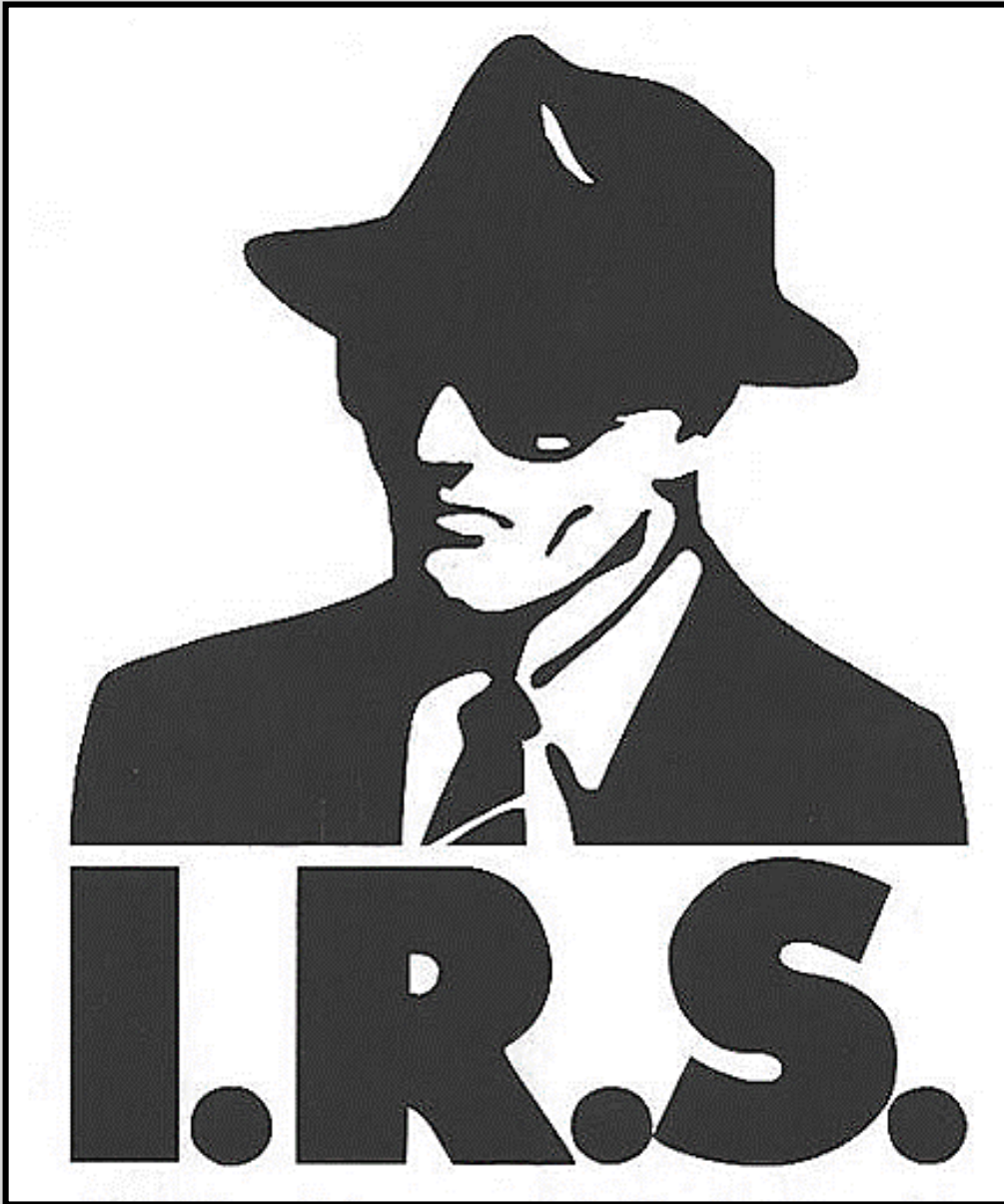
Pennsylvania SHPO

- First point of contact
- Provide application forms, regulations and technical assistance
- Maintain records of properties listed in National Register
- Assist in process to list a building or a district in National Register
- Advise applicants on rehabilitation projects and make site visits
- Make certification recommendations to NPS

National Park Service



- Reviews applications to certify a building as a **historic structure** and if proposed and completed work is a **certified rehabilitation** according to the Standards
- Issues all decisions in writing
- Transmits copies of decisions to IRS
- Publishes program information:
 - Regulations
 - SOI Standards for Rehabilitation
 - Historic Preservation Certification Application
 - Technical guidance information on rehabilitation treatments.



Internal Revenue Service

- Publishes regulations on qualified rehabilitation expenses, time periods for incurring expenses, and all other financial matters.
- Answers inquiries on financial aspects of the program, and publishes an audit guide to assist owners.
- Audits taxpayers to ensure that only parties eligible for the 20% tax credits use them.

Eligibility Requirements

There are 4 factors that can help you decide whether your rehabilitation project would meet the basic requirements for the federal or state tax credit:

1) The building must be a “**certified historic structure**” which means it must be:

- Listed in the National Register of Historic Places or
- Certified as contributing to the significance of a "registered historic district.”



118 and 120 Northampton St., Easton, PA



Israel Building, Lykens, Dauphin County

2) After rehabilitation, building must be used for an **income-producing purpose for at least five years.**

- Income-producing purposes include **commercial, industrial, agricultural, rental residential or apartment use.**
- Owner-occupied residential properties **do not** qualify for the federal rehabilitation tax credit.
- Credit subject to recapture if property is sold during 5 years



Masonic Hall, Pittsburgh, PA

3) The project must meet the "substantial rehabilitation test"

- The cost of rehabilitation must exceed the **greater** of \$5,000 or the pre-rehabilitation value/**adjusted basis** of the building
- The test must be met within a self-defined 24 month period or within 60 months for a phased project

$$\text{A} - \text{B} - \text{C} + \text{D} = \text{Adjusted Basis}$$

A = purchase price of property

B = cost of land at time of purchase

C = depreciation taken for an income-producing property

D = cost of any capital improvements made since purchase

Substantial Rehabilitation Test

(A) Purchase Price of Property \$125,000

- (B) value of land 40,000

- (C) depreciation 0

+ (D) improvements 0

Value of the Building = **\$85,000**

Applicant MUST spend more than
\$85,000 within a defined 24 month
period to qualify for credit



39 N. Main St., Lambertville, NJ

4) The completed work must be a “**certified rehabilitation**” according to the Secretary of the Interior's Standards for Rehabilitation.

- These are ten principles that ensure the historic character of the building has been preserved in the rehabilitation.
- Take into consideration economic and technical feasibility.
- Apply to buildings of all types, sizes, uses, materials.
- Apply to exteriors and interiors.
- Extend to building site, landscape and new construction.
- All ten Standards must be met



Computing the Credit:

Only “qualified rehabilitation expenditures” are eligible for credit

- Costs directly related to repair or improvement of structural and architectural features of historic building that qualify include:
 - Walls, partitions, ceilings, windows and doors, mechanical systems, elevators and stairs, etc...
- Both “hard” and “soft” costs qualify
- Expenses that do not qualify include:
 - Acquisition, Site Work, Appliances, Cabinets, Furniture, Additions and new construction

Credit equals related % of all qualified rehabilitation expenditures

- $\$100,000 \times 20\% = \$20,000$



Temple II North Gratz Project, Philadelphia, PA

QUESTIONS???





Historic Preservation Certification Application Instructions

Form 10-168 Instructions
Revised March 2014

The National Park Service (NPS) administers the Federal Historic Preservation Tax Incentives program with the Internal Revenue Service (IRS) and in partnership with State Historic Preservation Offices. The tax incentives promote the rehabilitation of income-producing historic structures of every period, size, style and type. Through this program, underutilized or vacant schools, warehouses, factories, retail stores, apartments, hotels, houses, offices and other buildings throughout the country have been returned to useful life in a manner that maintains their historic character.

The Historic Preservation Certification Application is a **three-part application** used to apply for certifications required for Federal historic preservation tax incentives. The NPS certifies whether a building is a "certified historic structure" and whether a rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation and is consistent with the historic character of the building and, where applicable, with the district in which it is located.

Department of the Interior regulations (36 CFR Part 67) take precedence in the event of any inconsistency with this application. Approval of applications for Federal historic preservation tax incentives is conveyed only in writing by duly authorized officials of the NPS acting on behalf of the Secretary of the Interior. Approval of a project by other Federal, State, and local agencies and organizations does not ensure approval by the Secretary of the Interior for Federal tax purposes.

Applicants are *strongly* encouraged to contact their [State Historic Preservation Office \(SHPO\)](#) early in the project planning process, to submit applications describing proposed work, and to receive approval from the NPS before beginning rehabilitation work. Owners who undertake rehabilitation projects without prior approval from the NPS do so at their own risk. In the event of any discrepancy between the application form and supplementary materials submitted with it (such as architectural plans), the application form takes precedence. Photographs and other materials sent with the application become the property of the NPS and may be reproduced without permission.

IRS code and regulations govern all financial and other tax matters relating to the rehabilitation tax credits (Section 1.48-12) and the tax deduction for easement donations (Section 1.170A-14). General information, prepared by the IRS, about the tax aspects of these incentives is available at the [program website](#). Specific questions about the tax aspects of these incentives should be addressed to the IRS. Approval of historic preservation certification applications by the NPS does *not* mean that applications meet IRS requirements.

At a glance

page 1	Federal Tax Incentives for Historic Preservation
page 2	Before Applying
page 2	Application Process
page 3	Part 1—Evaluation of Significance
page 5	Part 2—Description of Rehabilitation
page 8	Amendments / Advisory Determinations
page 9	Part 3—Request for Certification of Completed Work
page 10	Photographs for Certification Applications
page 10	Review Fees

Federal Tax Incentives for Historic Preservation

- 20% income tax credit for the "certified rehabilitation" of a "certified historic structure."
- A "certified historic structure" is a building that is listed individually in the National Register of Historic Places; or located in a "registered historic district" and certified by the Secretary of the Interior as contributing to the historic significance of the district. A "registered historic district" is a district listed in the National Register or a state or local district certified by the Secretary of the Interior.



Application Process

Three Part Application Process

1) Part 1 Evaluation of Significance

- Verifies “Certified Historic Structure”

2) Part 2 Description of Rehabilitation

- Describes interior and exterior work

3) Part 3 Certification of Completed Work

- Verifies work was completed as proposed

Applicant Submits application to State
Historic Preservation Office (SHPO)



National Park Service receives application
from SHPO, makes final certification
decision, notifies applicant



418 N. Beaver Street, York, PA

Application Process



Owner/Consultant prepares Historic Certification Application



BHP verifies all information, offers recommendations



Technical Preservation Services makes final certification decision




IRS receives Owners return with Form 3468 and signed Part 3 application

Historic Preservation Certification Application

Part 1 – Evaluation of Significance

Does it contribute to the historic district?

- Physical Description
- Statement of Significance
- Building inventory from nomination
- Period of Significance
- District Map
- Photographs and Photo Key

 UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 – EVALUATION OF SIGNIFICANCE

OMB Approved
No. 1024-0009
Form 10-158
Rev. 2014

NPS Project Number _____

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. Property Name _____
Street _____
City _____ County _____ State _____ Zip _____
Name of Historic District _____
☐ National Register district ☐ certified state or local district ☐ potential district

2. Nature of request (check only one box)
☐ certification that the building contributes to the significance of the above-named historic district or National Register property for rehabilitation purposes.
☐ certification that the building contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes.
☐ certification that the building does not contribute to the significance of the above-named district.
☐ preliminary determination for individual listing in the National Register.
☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.
☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. Applicant
I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes] ☐ (1) I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or (2) ☐ if I am not the owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written agreement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.
Name _____ Signature _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

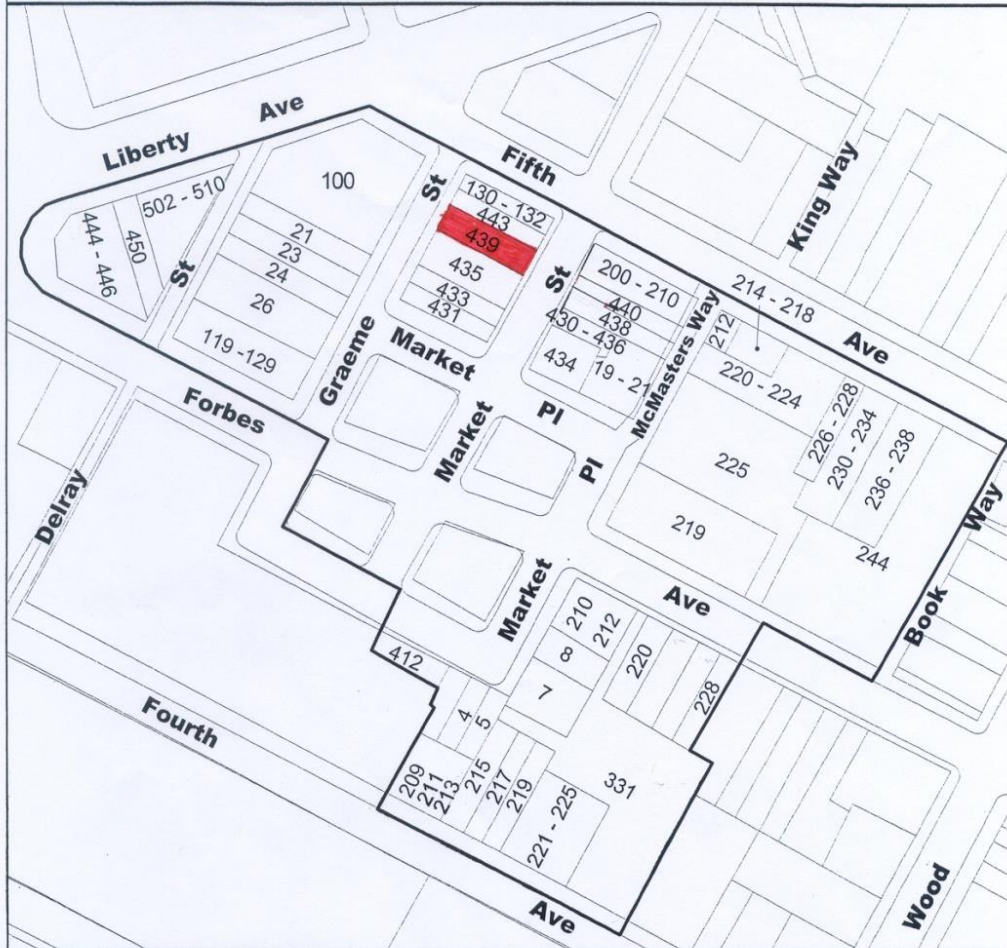
NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Part 1 for the above-named property and has determined that the property:
☐ contributes to the significance of the above-named district or National Register property and is a "certified historic structure" for rehabilitation purposes.
☐ contributes to the significance of the above-named district and is a "certified historic structure" for a charitable contribution for conservation purposes.
☐ does not contribute to the significance of the above-named district.

Preliminary Determinations:
☐ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.
☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.
☐ appears to contribute to the significance of a registered historic district if the period or area of significance as documented in the National Register nomination or district documentation on file with the NPS is expanded by the State Historic Preservation Officer.
☐ does not appear to qualify as a certified historic structure.

Date _____ National Park Service Authorized Signature _____
☐ NPS comments attached

Market Square

City Designated Historic District



Designated December 28, 1992

0 50 100 150 Feet

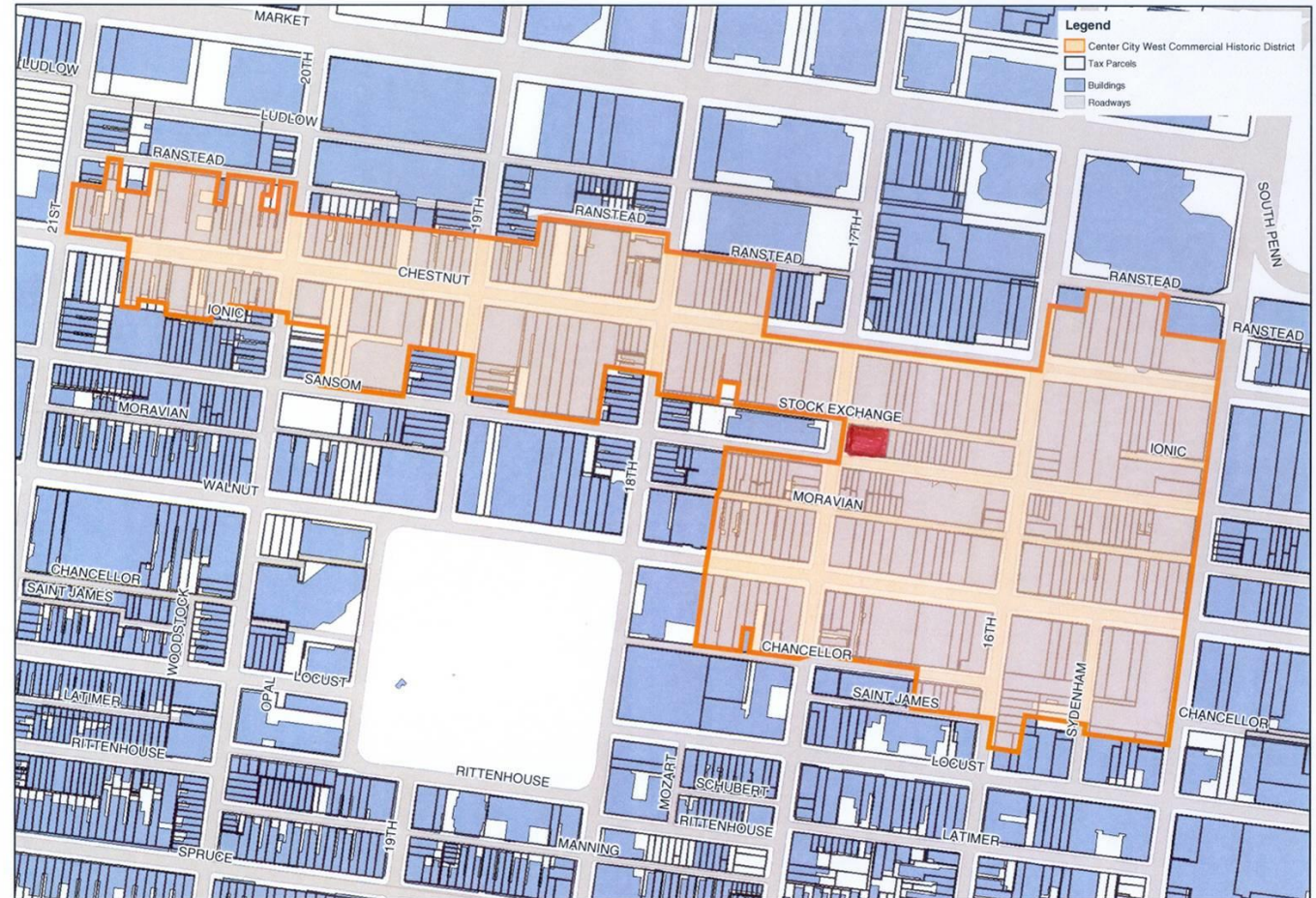
City Historic District
Parcels



Historic District Maps

Center City West Commercial Historic District

Philadelphia, Pennsylvania



Photographs - document existing condition and character defining features



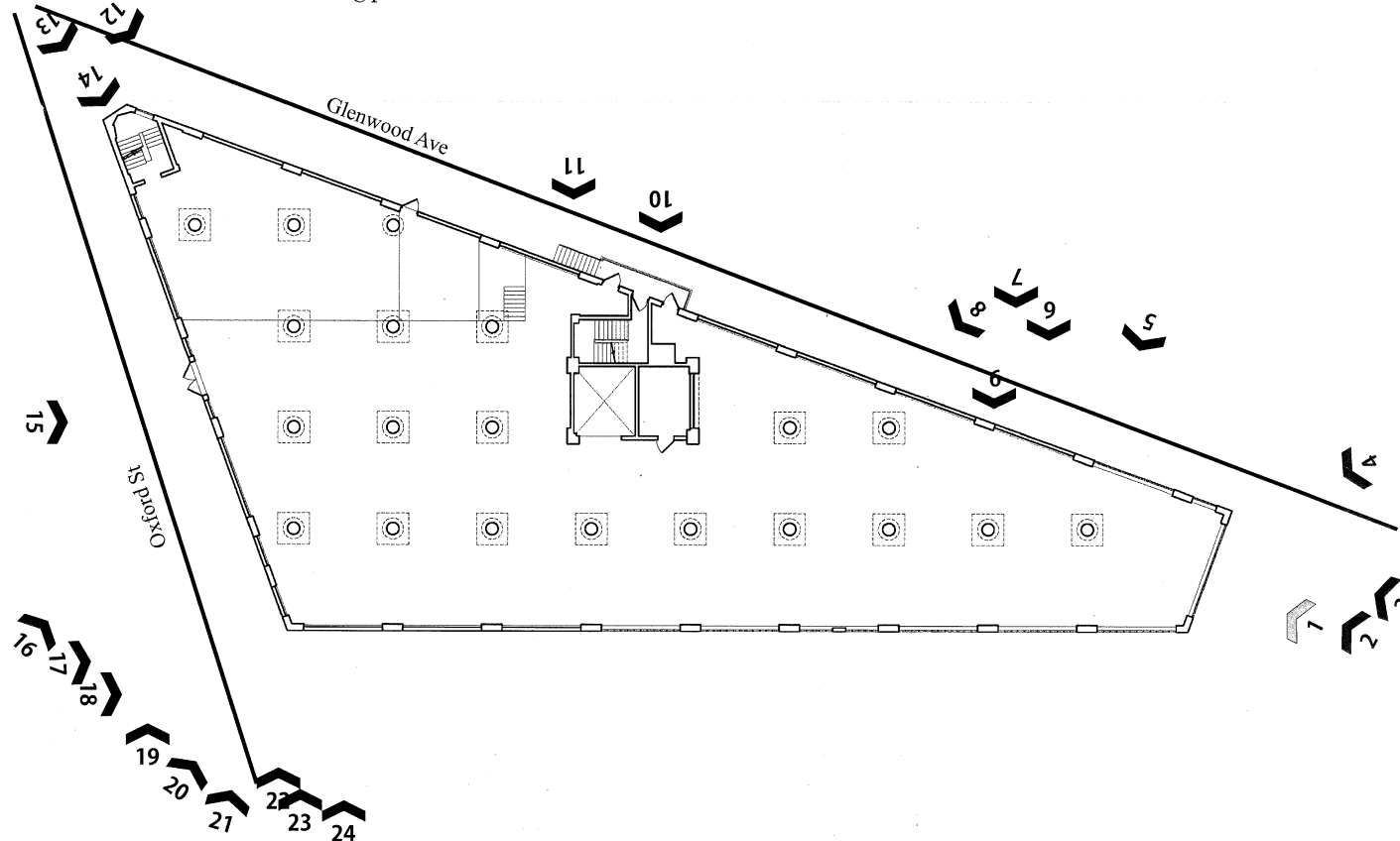
Project Name: Harry C. Kahn Furniture Warehouse
3101 Glenwood Avenue
Philadelphia, PA
November 2015



Exterior

Photos 1 – 24

Yellow arrow indicates starting point









Photographs - document existing condition and character defining features



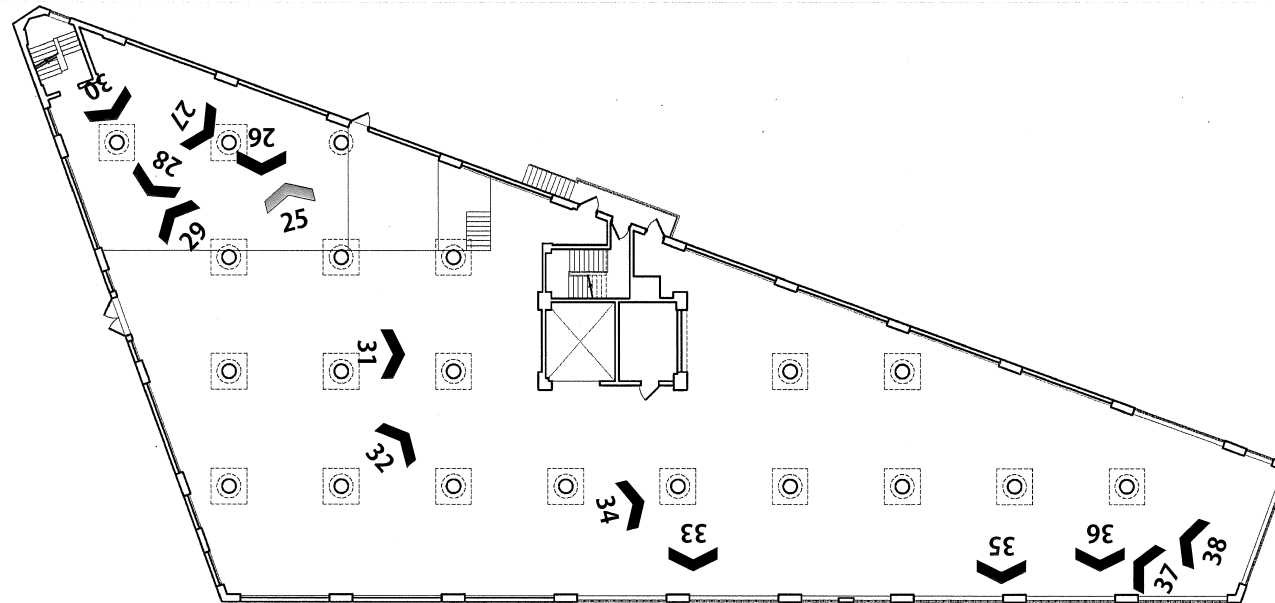
Project Name: Harry C. Kahn Furniture Warehouse
3101 Glenwood Avenue
Philadelphia, PA
November 2015



First Floor

Photos 25-38

Yellow arrow indicates starting point














Historic Preservation Certification Application

Part 2 – Description of Rehabilitation

- Describes of proposed work
- Estimate QREs for review fee payable on pay.Gov
- Architectural drawings
 - Existing floor plans
 - Proposed floor plans
 - Elevations
- Additional photographs if necessary

 UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 – DESCRIPTION OF REHABILITATION

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014


NPS Project Number _____

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. **Property Name** _____
Street _____
City _____ County _____ State _____ Zip _____
Name of Historic District _____
☐ Listed Individually in the National Register of Historic Places; date of listing _____
☐ Located in a Registered Historic District; name of district _____
☐ Part 1 – Evaluation of Significance submitted? Date submitted _____ Date of certification _____

2. **Project Data**
Date of building _____ Estimated rehabilitation costs (QRE) _____
Number of buildings in project _____ Floor area before / after rehabilitation _____ / _____ sq ft
Start date (estimated) _____ Use(s) before / after rehabilitation _____ / _____
Completion date (estimated) _____ Number of housing units before / after rehabilitation _____ / _____
Number of phases in project _____ Number of low-moderate income housing units before / after rehabilitation _____ / _____

3. **Project Contact** (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. **Applicant**
I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes,  (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or (2) ☐ If I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.
Name _____ Signature _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____
☐ Applicant, SSN, or TIN has changed since previously submitted application.


NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Part 2 for the above-named property and has determined that:
☐ the rehabilitation described herein is consistent with the historic character of the property and, where applicable, with the district in which it is located and that the project meets the Secretary of the Interior's Standards for Rehabilitation. This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is complete.
☐ the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's Standards for Rehabilitation if the attached conditions are met.
☐ the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

Date _____ National Park Service Authorized Signature _____
☐ NPS conditions or comments attached

Phased Projects

Two or more distinct stages of development over 60 month period

- plans and specs outlines all phases
- plans complete BEFORE construction begins
- expectation that all work will be completed

 UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 – DESCRIPTION OF REHABILITATION

CMS Approved
No. 1024-0009
Form 10-168
Rev. 2014

NPS Project Number _____

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1. Property Name _____
Street _____
City _____ County _____ State _____ Zip _____
Name of Historic District _____
☐ Listed Individually in the National Register of Historic Places; date of listing _____
☐ Located in a Registered Historic District; name of district _____
☐ Part 1 – Evaluation of Significance submitted? Date submitted _____ Date of certification _____

2. Project Data
Date of building _____ Estimated rehabilitation costs (GRC) _____
Number of buildings in project _____ Floor area before / after rehabilitation _____ / _____ sq ft
Start date (estimated) _____ Use(s) before / after rehabilitation _____ / _____
Completion date (estimated) _____ Number of housing units before / after rehabilitation _____ / _____
Number of phases in project _____ Number of low/moderate income housing units before / after rehabilitation _____ / _____

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. Applicant
I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable] (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or (2) ☐ If I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.
Name _____ Signature _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____
☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Part 2 for the above-named property and has determined that:
☐ the rehabilitation described herein is consistent with the historic character of the property and, where applicable, with the district in which it is located and that the project meets the Secretary of the Interior's Standards for Rehabilitation. This letter is a preliminary determination only; once a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is complete.
☐ the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's Standards for Rehabilitation if the attached conditions are met.
☐ the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

Date _____ National Park Service Authorized Signature _____
☐ NPS conditions or comments attached

Part 2 Application Form: Description of Rehabilitation

RECEIVED ON
FEB 04 '16
HISTORIC PRESERVATION
MAR 07 2016

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014

HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 - DESCRIPTION OF REHABILITATION

NPS Project Number 33677

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. **Property Name** Harry C. Kahn & Son Warehouse
Street 3101-27 W. Glenwood Avenue
City Philadelphia County Philadelphia State PA Zip 19121-3506
Name of Historic District _____
☐ Listed individually in the National Register of Historic Places; date of listing _____
☐ Located in a Registered Historic District; name of district _____
☒ Part 1 - Evaluation of Significance submitted? Date submitted 12/16/15 Date of certification _____

2. **Project Data**
Date of building 1922 Estimated rehabilitation costs (GPE) \$12,500,000
Number of buildings in project 1 Floor area before / after rehabilitation 70,410 / 70,410 sq ft
Start date (estimated) 06/01/16 Use(s) before / after rehabilitation vacant / comm/apts
Completion date (estimated) 06/01/17 Number of housing units before / after rehabilitation 0 / 55
Number of phases in project 2 Number of low-moderate income housing units before / after rehabilitation 0 / 0

3. **Project Contact** (if different from applicant)
Name Cindy Hamilton Company Heritage Consulting Group
Street 15 W. Highland Avenue City Philadelphia State PA
Zip 19118-3322 Telephone (215) 248-1260 Email Address chamilton@heritage-consulting.com

4. **Applicant**
I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable] (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or (2) ☒ If I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.
Name David Waxman Signature _____ Date 12-20-15
Applicant Entity Brewerytown Pyramid Building Partners, LP SSN _____ or TIN 34
Street 1234 N. 30th Street #2 City Philadelphia State PA
Zip 19121-4500 Telephone () 5 Email Address im
☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only

The National Park Service has reviewed the Historic Preservation Certification Application - Part 2 for the above-named property and has determined that:

☒ the rehabilitation described herein is consistent with the historic character of the property and, where applicable, with the district in which it is located and that the project meets the Secretary of the Interior's Standards for Rehabilitation. This letter is a preliminary determination only, since a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is complete.

☐ the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's Standards for Rehabilitation if the attached conditions are met.

☐ the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

Date 4/20/16 Rebecca A. Sniffen NPS
National Park Service Authorized Signature

☐ NPS conditions or comments attached

CONTINUATION/AMENDMENT SHEET Historic Preservation Certification Application

Harry C. Kahn and Son Warehouse
Property Name

3101-27 W. Glenwood Avenue, Philadelphia, PA
Property Address

Item #1

ARCHITECTURAL FEATURE: Harry C. Kahn and Son Warehouse- Building/Project Information

DATE OF FEATURE: 1922 and subsequent changes

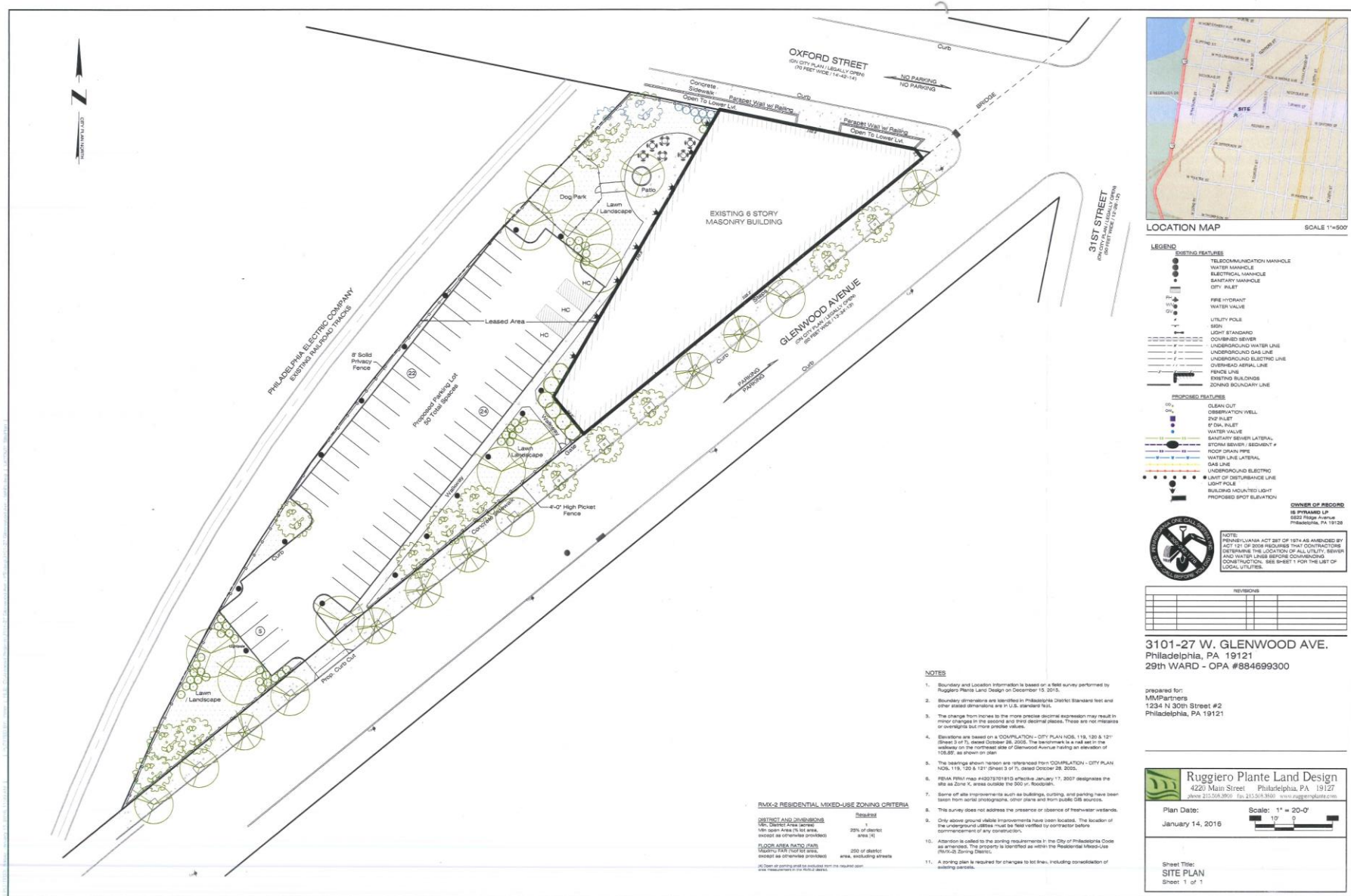
EXISTING FEATURE AND CONDITION: The Harry C. Kahn and Son Warehouse is located in the Brewerytown neighborhood in North Philadelphia. The subject building at 3101-27 W. Glenwood Ave. is located on the western edge of the neighborhood, delineated from the neighboring Strawberry Mansion neighborhood by the Pennsylvania Railroad tracks. It is located adjacent to the Pennsylvania Railroad tracks, between Glenwood Ave (to the east) and Oxford Street (to the north), and is surrounded by predominantly two- and three-story rowhouses and two-four-story former industrial buildings. The building was constructed as a warehouse for the Harry C. Kahn and Son furniture company in 1922. The five-story, triangular warehouse is constructed of reinforced concrete with brick and concrete infill. The interior was cleared by a previous unrelated owner, as a result, there are no interior finishes or features but the raw exposed concrete structure of the building and exposed and painted brick. The building has been vacant for a number of years and, consequently, has been heavily tagged with graffiti on both the interior and exterior that contains varied levels of significance.

WORK AND IMPACT ON FEATURE: The rehabilitation of the Harry C. Kahn and Son Warehouse will be undertaken in 2 phases. It is anticipated that the project will likely extend more than 24 months. As detailed in this application, Phase 1 will involve exterior work and Phase 2 will involve interior. The scope of work for both phases is detailed in this application.

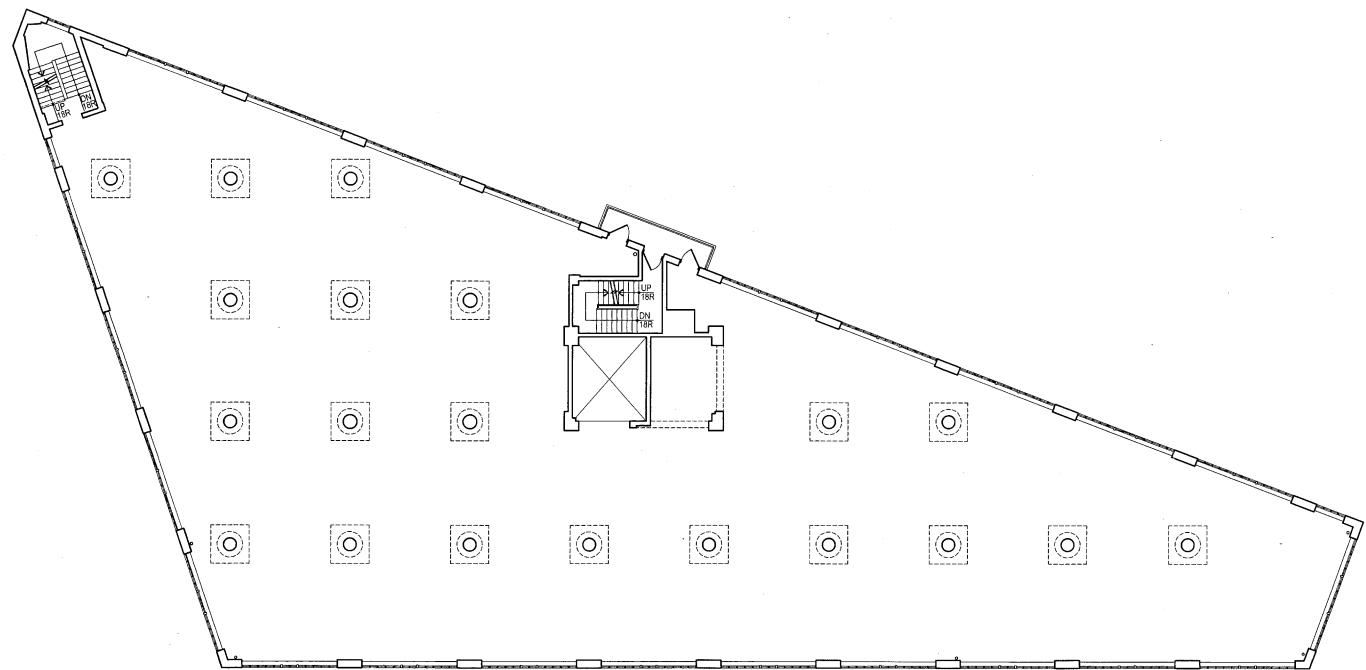
The proposed project will involve the rehabilitation of the complex for use as apartments, specifically artists' lofts, with gallery and office space within the basement and first floor and apartments on the upper floors. A surface parking lot for the building will be constructed off-site on a vacant lot to the south of the building. Additional site work will include a grass dog-run in the space between the building and the Pennsylvania Railroad tracks. Exterior work will include: painting of exterior concrete, the cleaning and repointing of masonry, replacement of the deteriorated windows and doors, replacement of garage doors with compatible storefronts, and replacement of roofing materials. Interior work will include: repartitioning of the buildings for use as office, gallery space, and apartments, and installation of new mechanical services and HVAC equipment.

PHOTOS: All
DRAWINGS: All

Existing Site Plan



Existing Typical Upper Floor Plans



TYPICAL EXISTING FLOOR PLANS (FLOORS 3-6)

SCALE: 1/8" = 1'-0" (22/34)
SCALE: 1/16" = 1'-0" (11/17)

the pyramid electric lofts
3101-27 west glenwood avenue, philadelphia, pa
mm partners, llc
1234 north 30th street, unit 2, philadelphia, pa



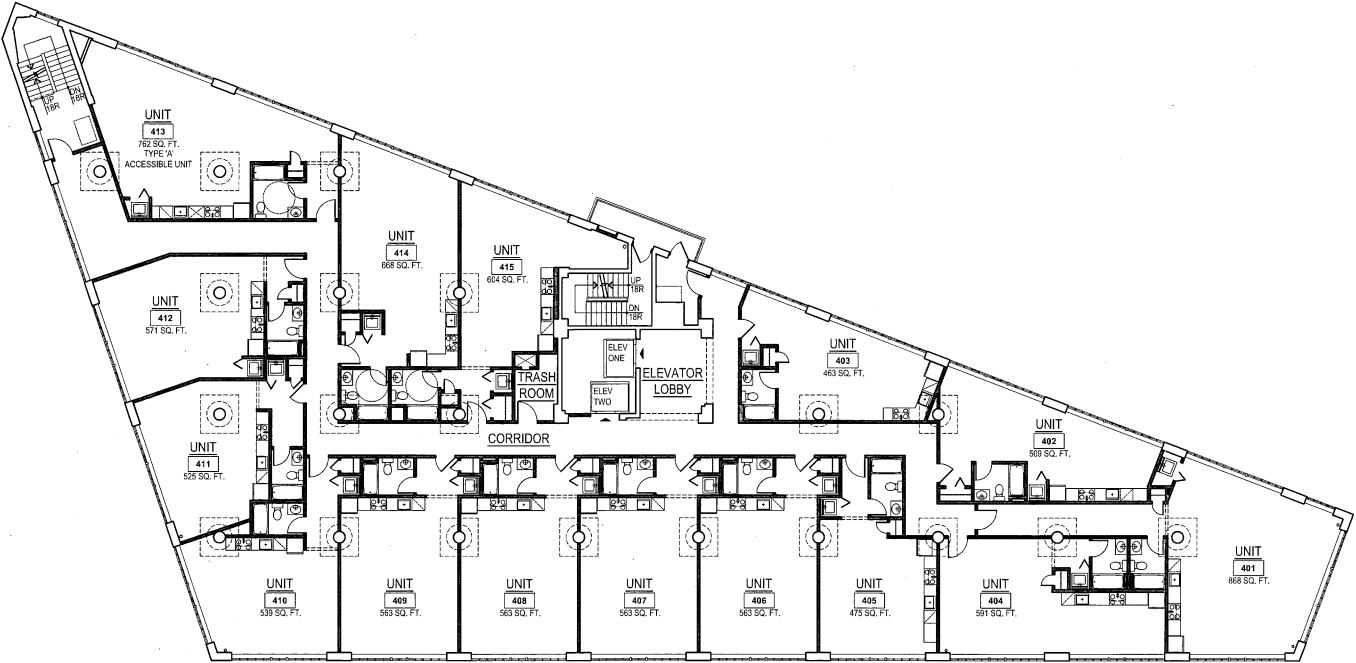
113 cumberland place
bryn mawr, pa 19010
610.525.2993 t
610.525.2889 f
www.marshallsabatini.com

date: 01.14.16
drawn by: kp

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x-3

Proposed Typical Upper Floor Plans



TYPICAL PROPOSED FLOOR PLAN (4TH & 5TH FLOOR)

SCALE: 1/8" = 1'-0" (22x34)
SCALE: 1/16" = 1'-0" (11x17)

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Existing Elevations



the pyramid electric lofts
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mm partners, llc
1234 north 30th street, unit 2, philadelphia, pa


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x-5

Proposed Elevations



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 mm partners, llc
 1234 north 30th street, unit 2, philadelphia, pa



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 bryn mawr, pa 19010

610.525.2993 t
 610.525.2889 f

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date: 01.14.16
 drawn by: kp

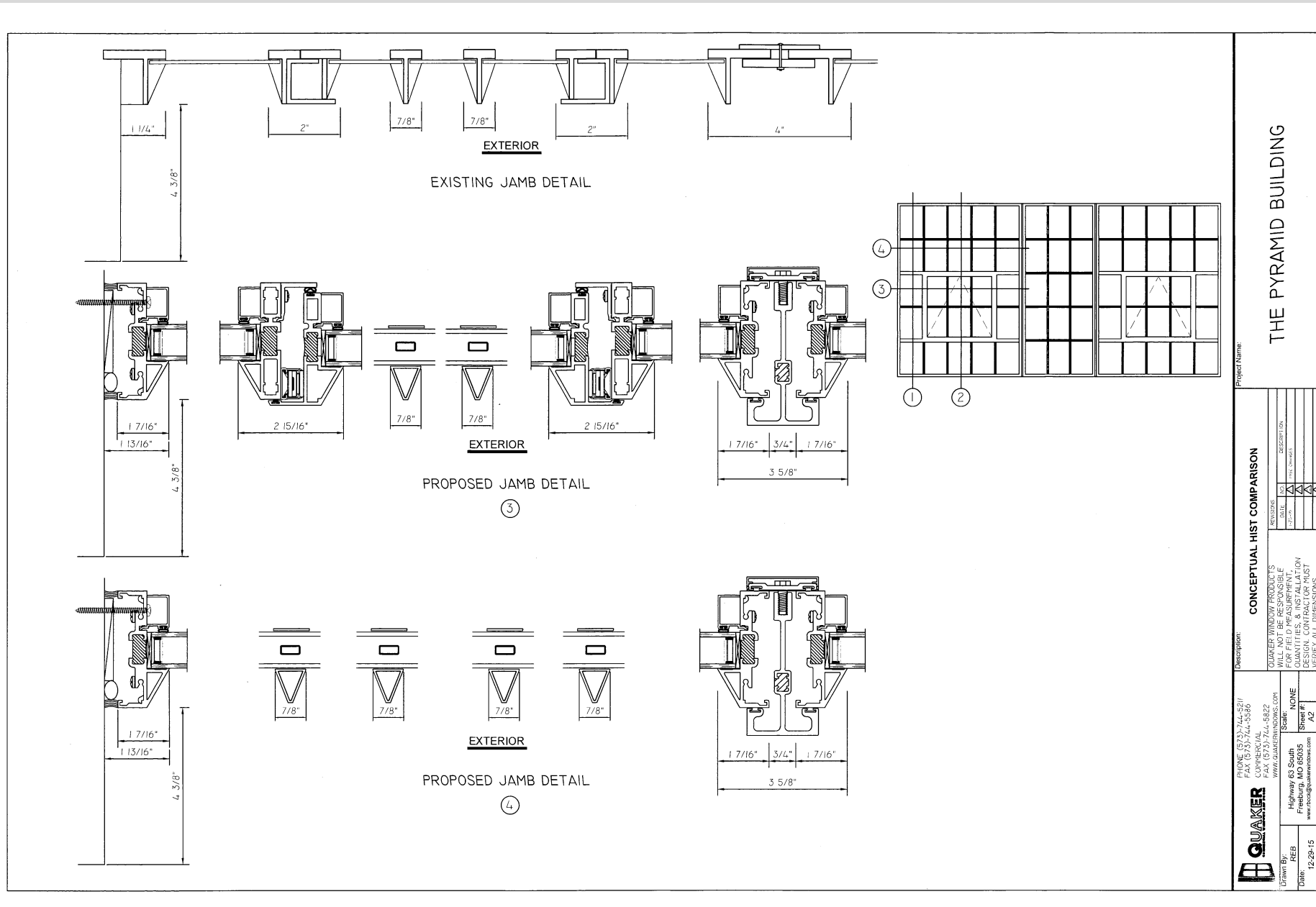
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a-7

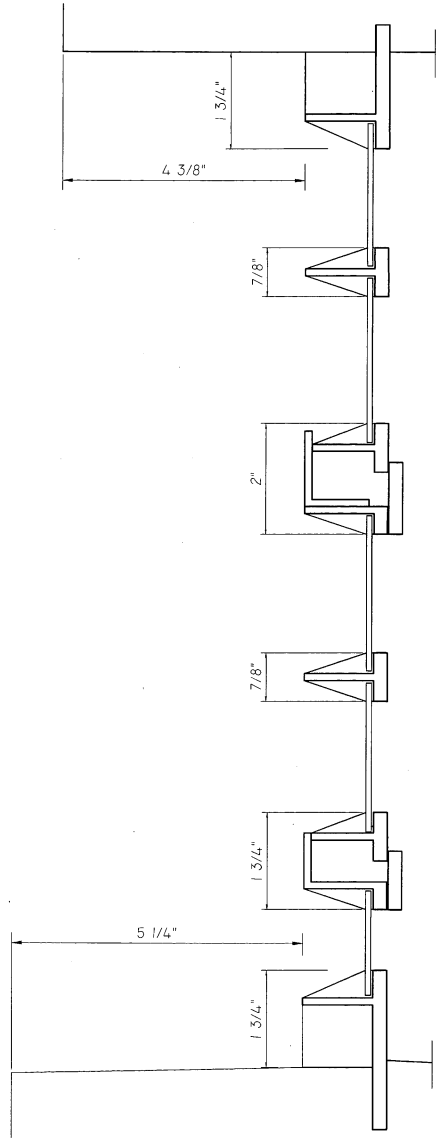
Window Replacement



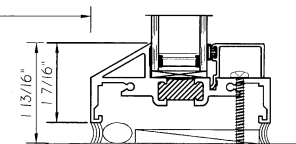
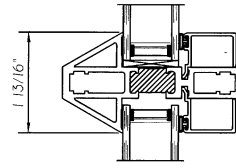
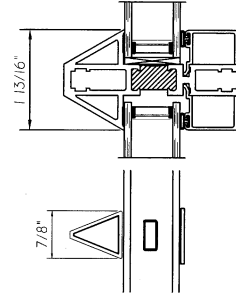
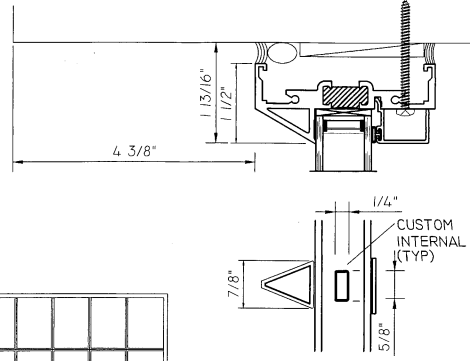
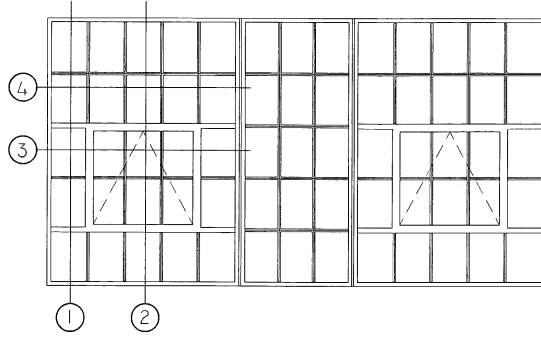
Window Drawings



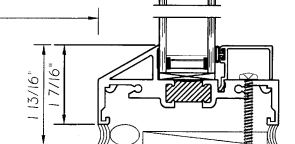
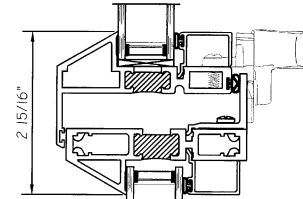
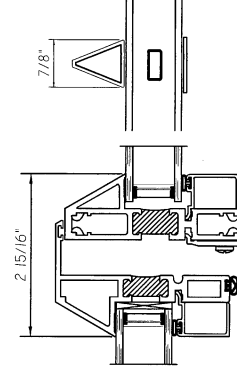
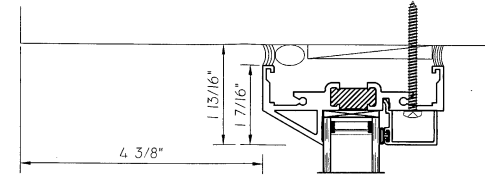
Window Drawings



EXISTING HEAD AND SILL DETAIL



PROPOSED HEAD AND SILL DETAIL



PROPOSED HEAD AND SILL DETAIL

[illegible]

THE PYRAMID BUILDING

Continuation/ Amendment Sheets



- Additional Information
- Window specifications
 - existing and proposed
- Revised Architectural Drawings

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

HISTORIC PRESERVATION CERTIFICATION APPLICATION
AMENDMENT / ADVISORY DETERMINATION

OMB Approved
No. 1024-0009
Form 10-168
Rev. 2014

NPS Project Number _____

Instructions: This page must bear the applicant's original signature and must be dated.

1. Property name _____
Property address _____

2. This form ☐ includes additional information requested by NPS for an application currently on hold.
☐ updates applicant or contact information.
☐ amends a previously submitted ☐ Part 1 ☐ Part 2 ☐ Part 3 application.
☐ requests an advisory determination that phase _____ of _____ phases of this rehabilitation project meets the Secretary of the Interior's Standards for Rehabilitation. Phase completion date _____
Estimated rehabilitation costs of phase (QRE) _____
Summarize information here; continue on following page if necessary.

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____


4. Applicant
I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that [check one or both boxes, as applicable] (1) ☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 57.2 (2011), and/or (2) ☐ I am not the fee simple owner of the above-described property, the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (i) either is attached to this application form and incorporated herein, or has been previously submitted, and (ii) meets the requirements of 36 CFR § 57.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 8 years.
Name _____ Signature _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____
☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only
The National Park Service has reviewed this amendment to the Historic Preservation Certification Application and has determined that the amendment:
☐ meets the Secretary of the Interior's Standards for Rehabilitation.
☐ will meet the Secretary of the Interior's Standard for Rehabilitation if the attached conditions are met.
☐ does not meet the Secretary of the Interior's Standards for Rehabilitation.
☐ updates the information on file and does not affect the certification.
Advisory Determinations:
☐ The National Park Service has determined that the work completed in this phase is consistent with the Secretary of the Interior's Standards for Rehabilitation. This determination is advisory only. A formal certification of rehabilitation can be issued only after all rehabilitation work and any associated site work or new construction have been completed. This approval could be superseded if it is found that the overall rehabilitation does not meet the Secretary's Standards. A copy of this form will be provided to the Internal Revenue Service.
Date _____ National Park Service Authorized Signature _____
☐ NPS conditions or comments attached

Historic Preservation Certification Application

Part 3 – Request for Certification

- Photos of completed work
- Placed in Service Date
- Building Rehab Costs
- New Construction Costs
- Original Signatures
- Fed ID Number of all owners!

 UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

OMB Approved
No. 1024-0009
Form 10-108
Rev. 2014

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 3 – REQUEST FOR CERTIFICATION OF COMPLETED WORK**

NPS Project Number

Instructions: This page must bear the applicant's original signature and must be dated.

1. Property Name
Street _____
City _____ County _____ State _____ Zip _____
Is property a certified historic structure? ☐ yes ☐ no If yes, date of NPS certification _____ OR date of National Register listing _____

2. Project Data
Project start date _____ Project completed and building placed in service date _____
Estimated rehabilitation costs (ORE) _____ Total estimated costs (ORE plus non-ORE) _____
Number of housing units before/after rehabilitation _____ / _____ Number of low/moderate housing units before/after rehabilitation _____ / _____

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. Applicant List all additional owners on next page.
I hereby attest that the information I have provided is, to the best of my knowledge, correct and that I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011). If I am not the fee simple owner of the above-described property, then I have checked the following box ☐ to attest that the fee simple owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which statement (a) either is attached to this application form and incorporated herein, or has been previously submitted, and (b) meets the requirements of 36 CFR § 67.3(a)(1) (2011). For purposes of this attestation, the singular shall include the plural wherever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment up to 5 years.
Name _____ Signature _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____
☐ Applicant, SSN, or TIN has changed since previously submitted application.
☐ There are no additional owners within the meaning of "owner" set forth in 36 CFR § 67.2 (2011).

NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Request for Certification of Completed Work (Part 3) for this property and has determined that:
☐ the completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation and is consistent with the historic character of the property and, where applicable, the district in which it is located. Effective the date indicated below, the rehabilitation of the "certified historic structure" is hereby designated a "certified rehabilitation." This certification is to be used in conjunction with appropriate Internal Revenue Service regulations. Questions concerning specific tax consequences or interpretations of the Internal Revenue Code should be addressed to the Internal Revenue Service. Completed projects may be inspected by an authorized representative of the Secretary to determine if the work meets the Standards for Rehabilitation. The Secretary reserves the right to make inspections at any time up to five years after completion of the rehabilitation and to revoke certification, if it is determined that the rehabilitation project was not undertaken as presented by the owner in the application form and supporting documentation, or the owner, upon obtaining certification, undertook unapproved further alterations as part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.
☐ the completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation. However, because this property is not yet a "certified historic structure," the rehabilitation cannot be designated a "certified rehabilitation" eligible for Federal tax credits at this time. It will become a "certified historic structure" on the date it or the historic district in which it is located is listed in the National Register of Historic Places. On that date, the completed rehabilitation will automatically become a "certified rehabilitation." It is the owner's responsibility to obtain such listing through the State Historic Preservation Office. Questions concerning specific tax consequences or interpretations of the Internal Revenue Code should be addressed to the Internal Revenue Service. Completed projects may be inspected by an authorized representative of the Secretary to determine if the work meets the Standards for Rehabilitation. The Secretary reserves the right to make inspections at any time up to five years after completion of the rehabilitation and to revoke certification, if it is determined that the rehabilitation project was not undertaken as presented by the owner in the application form and supporting documentation, or the owner, upon obtaining certification, undertook unapproved further alterations as part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.
☐ the rehabilitation is not consistent with the historic character of the property or the district in which it is located and the project does not meet the Secretary of the Interior's Standards for Rehabilitation.
A copy of this determination will be provided to the Internal Revenue Service in accordance with Federal law.

Date _____ National Park Service Authorized Signature _____
☐ NPS comments attached

Photographs of completed work



Caution

1. Can not submit Part 1, Part 2 and Part 3 at the same time. [Tres. Reg. 1.48-12(d)(1)]
2. If a building or historic district not yet listed in the National Register, certification is not final until listing is complete
3. Additional work undertaken within a 5-year period after certification must be reviewed by the SHPO and NPS and must meet Standards for Rehabilitation

Historic Tax Credit Best Practices



Keppel Building, Lancaster, PA

- SHPO Communication
 - Verify NR Status
 - Discuss application and review process
 - Coordinate state/federal review
 - Multiple building and/or phased projects
 - Site visits???
- Application Issues
 - Incomplete applications
 - Lack of/poor documentation
 - Architectural plans
- Review Issues
 - Starting work prior to NPS review
 - Refusing to negotiate with NPS
 - Assuming local review / approval
 - Code issues - egress and fire safety
 - **Energy efficiency and LIHTC projects!!!**

QUESTIONS????

