THE HFA INSTITUTE 2019

Strategic Housing Credit Development Siting

Michael Novogradac Novogradac & Company LLP @Novogradac



HOME and Housing Trust Fund JANUARY 13 – 15













Housing Credit
JANUARY 15 – 17

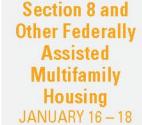


















LIHTC Developments in Opportunity Zones

 The Case for Combining LIHTCs and OZ Incentive



LIHTC Investing to Date

Allocating Agency Considerations

OPPORTUNITY ZONE





The Case for Combining LIHTC with Opportunity Zones



OPPORTUNITY ZONE

• The Goal:

- Better equity pricing
- More investors
- More housing
- Structurally Compatible:
 - Based on equity investments
 - Rental real estate
 - New construction
 - Substantial Improvement
 - 5-7-10 year holds/15 year hold
 - Existing capital raising and deployment infrastructure

www.OpportunityZonesResourceCenter.com





The Case for Combining LIHTC with Opportunity Zones



OPPORTUNITY ZONE

• Challenges:

- Banks and capital gains
- Timing
 - Gains recognition
 - Property level funding needs
- Treasury Guidance
 - Fund level reserves
 - Residential rental real estate
 - Gain negative capital account
 - Multi-property funds





Status of Raising Equity for LIHTC Developments in Opportunity Zones



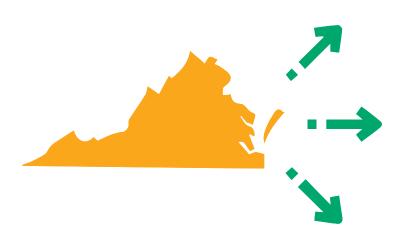
OPPORTUNITY ZONE

- Existing investors dominated by banks
 - Amount and access to capital gains
- Existing funds being formed
 - Focus on nonbank investors
- LIHTC/OZ investments made to date





The Future of Allocation: Considering OZ



- Pricing still developing
 - Two tier pricing levels
- Market Considerations:
 - Non LIHTC OZ Rental Housing Construction
 - Effect of other OZ equity investments

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