



**Historic Property Reinvestment Program**

**2024 Fall Application Round**

**Questions & Answers Log – Last Updated 09/27/2024**

Question Number	Received Date	Question	Answer Date	Answer
1.	9/10/2024	During the course of the project and beyond, what kind of documentation/procedures are required for compliance with the Program’s prevailing wage requirement?	9/16/2024	Information regarding prevailing wage requirements under the Program can be found on NJEDA’s website at <a href="https://www.njeda.gov/affirmativeaction/">https://www.njeda.gov/affirmativeaction/</a> . Additionally, detailed information and guidance of compliance requirements is also provided to all Program’s awardees at a pre-construction meeting.
2.	9/19/2024	Does a building on the campus of a private, non-profit university used for administration, classrooms and public use (open to the public) fit within the definition a “Qualified property”? Is the tuition we receive considered “income-producing”? It should be noted that the University serves as an economic engine for the region and the building is on the National Register of Historic Places.	9/20/2024	A private, non-profit university is considered a business entity (in the business/trade of education) within the HPRP and tuition as well as other sources of income such as donations, grants, patents, etc. can be considered as income. Therefore, if income is generated as a result of activities conducted within the building, the building would meet the definition of qualified property.
3.	9/19/2024	We plan to apply to the NJ Historic Trust funding. As with the NJEDA Historical Properties Program, I believe there is a matching requirement for the NJ Historic Trust. Is it possible to apply and receive an award from both programs for the same project and is it possible for the combined awards to total more than 50% of the cost of the project?	9/20/2024	<p>There are no provisions within the HPRP that prohibit projects receiving funding from the NJ Historic Trust from also receiving a tax credit award under the Program. An approved grant amount would need to be shown in an HPRP application as one of the sources of funding within the funding stack. However, applicants to the HPRP must comply with feasibility and funding gap program requirements as follows:</p> <ul style="list-style-type: none"> <li>Projects located within a Government Restricted Municipality (Atlantic City, Paterson, or Trenton) or with total project costs of under \$5 million must demonstrate at the time of application that</li> </ul>

				<p>without the tax credit, the rehabilitation project is not economically feasible.</p> <ul style="list-style-type: none"> <li>Projects not located in a Government Restricted Municipality and with total project costs of \$5 million or more must demonstrate at the time of application that without the tax credit, the rehabilitation project is not economically feasible and prove that a project financing gap exists, and the tax credit award being considered for the project is equal to or less than the project financing gap.</li> </ul>
4.	9/19/2024	Requesting clarification regarding one of the acceptable identification requirements under the Qualified Property definition of under the Program. Specifically, clarification was requested regarding what would constitute identification “in accordance with criteria established by a municipality in which the property, structure or district is located if the criteria for identification or registration has been approved by the Officer as suitable for substantially achieving the purpose of preserving and rehabilitating buildings of historic significance within the jurisdiction of the municipality, and if located within a district, certified by the Officer as contributing to the historic significance of the district.”	9/20/2024	<p>Under the HPRP a municipality with identification or registration criteria that has been approved by the Officer, means a Certified Local Government (CLG) as defined and mandated as part of an amendment to the National Historic Preservation Act of 1966. Identification by a local historic preservation commission that has not been certified as a CLG does not meet HPRP requirements for prior identification. A list of current CLGs in NJ can be found <a href="https://www.nj.gov/dep/hpo/3preserve/clg_links.htm">here</a> <a href="https://www.nj.gov/dep/hpo/3preserve/clg_links.htm">https://www.nj.gov/dep/hpo/3preserve/clg_links.htm</a>.</p>

5.	9/23/2024	At what stage of design should a project apply to the Program?	9/23/2024	<p>To apply to the Program, an applicant should have drawings with sufficient information to show existing and proposed wall configuration, anticipated changes (such as removal of existing fabric and introduction on new features). Drawings should include floor plans, elevations of all exterior facades and sections (if available). Additionally, information regarding treatment of historic fabric and new materials should be submitted either by a formal set of specification or with detailed notes in drawings and/or cut sheets showing information for materials, finishes and methods as appropriate to describe work throughout the building.</p> <p>Drawings and specifications submitted as part of an application under the Program are reviewed to evaluate project readiness, general compliance with the Secretary of the Interior Standards, and to assess appropriateness of project schedule and construction cost estimate. Additionally, drawings and specifications are also used to review eligible costs and to determine final tax credit award for the project. As a result, projects that are at least at a level of 60% design, Design Development Phase, or in Bridging Documents (for design-build projects) are likely best suited to apply. Please note, project readiness is reviewed as part of the evaluation process and is included in scoring criteria. Therefore, lack of substantial information contained in drawings and specifications may affect final project scores. For more information, please refer to scoring criteria here: <a href="https://www.njeda.gov/wp-content/uploads/2022/02/Historic_Project-Scoring-Criteria.pdf">https://www.njeda.gov/wp-content/uploads/2022/02/Historic_Project-Scoring-Criteria.pdf</a>.</p>
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<p>6.</p>	<p>9/18/2024</p>	<p>We are working on a project in [REDACTED] and the owner is interested in applying for the state credit this round. However, the building is currently not listed on the National Register, but we have submitted a Part 1 Application to the NJ SHPO and should be receiving a Determination of Eligibility from the SHPO by the end of this month.</p> <p>We are hoping that the project would still be eligible for this round of the state credit given that it will have a DOE this month and should be fully listed on the National Register in the beginning of the new year.</p>	<p>9/26/2024</p>	<p>Under the current application round the only allowable forms of prior identification are:</p> <ol style="list-style-type: none"> <li>1. Listing in the NJ Register of Historic Places</li> <li>2. Listing in the National Registers of Historic Places</li> <li>3. Designated as historic by the Pinelands Commission</li> <li>4. Identified or register as historic by a Certified Local Government.</li> </ol> <p>If the identification is as part of a district, the property must be certified as contributing to the district.</p> <p>NOTE: Changes made to the Program by a bill signed by Governor Murphy in June of 2024, allowing for a Part 1 approval by the NPS under the Federal Historic Tax Credit Program to count as prior identification under the Program, <u>will take effect after new rules for the HPRP are adopted.</u></p>
<p>7.</p>	<p>9/27/2024</p>	<p>We're wondering if the historic designation must be established prior to submitting the proposal on 10/29, or if a proposal can be submitted while the official designation is being reviewed?</p>	<p>9/27/2024</p>	<p>Prior historic designation is a program requirement. To be eligible under the Program a property must meet the Program's definition of "Qualified Property" (found under N.J.A.C. 19:31-26.2), prior to application submission.</p>