## Century City Villard Library

New Markets Tax Credit Financing

## Why use New Market Tax Credit Financing?

### Century City

- Originally proposed as one of the possible ways to close the anticipated financing gap.
- ▶ Requires NO new sources of funding from City/RACM.
- Designated funding sources (City, RACM, DOT, TID, etc.) can be used to leverage the monetization of the NMTC.
- Provides over \$3 million towards filling the financing gap.
- Ability to combine with Villard Library project which on its own is too small to maximize the benefit of NMTC.

### Villard Library

- Originally proposed as a possible funding source.
- ▶ Replaces over \$600,000 of City funding.

## Other Projects that have utilized NMTC

- MEDC is a Community Development Entity (CDE) and has received 4 awards totaling \$107 million.
- NMTC's are awarded annually on a competitive application process to CDE's.
- NMTC Program was designed with projects like Century City and the Villard Library in mind.
  - Palermo's Pizza Phase I and II
  - Discovery World
  - Ingeteam
  - Academy of Leadership & Learning
  - Summerfest

## Century City Redevelopment Corporation (CCRC)

#### Why do we need the CCRC

- ▶ The NMTC regulations have a "True Debt" requirement.
  - Project and the source of funding cannot be the same. (Cannot lend to yourself.)
  - Since RACM and City will be providing funding to leverage the tax credits, a separate entity, controlled by RACM and the City needs to be established.

#### What is the CCRC?

- A corporation created by the City pursuant to Wis. Statutes.
- Three person Board
  - Common Council member that is on RACM Board
  - Comptroller
  - Commissioner of DCD
- Staffed by RACM
- Component Unit of City

# Who are the participants in a NMTC transaction?

- Allocatee a CDE (MEDC) that has been awarded NMTC.
  The Allocatee sets its fee structure based on its application.
- Tax Credit Investor an entity that is willing to monetize (provide cash for a future tax benefit) the NMTC at a discount. US Bank Community Development Corporation has provided a commitment letter.
- Leveraged Lender party that provides the remaining cash to complete the project. **RACM,TID, City, WIDOT**, etc., funds already allocated to the project will be used.
- Qualified Active Low Income Community Business (QALICB)
  - Business located and conducts operations in an eligible
    NMTC area. Century City Redevelopment Corporation.

#### **NMTC** Elements Century City Project **NMTC** Diagram NMTC INVESTOR RACM Revolving Loan Fund Leveraged RACM Funds (DOT Lender/RACM \$3,800,000 Investment Fund, LLC verage Loan C/D Investor/US Bank CDC \$ 9.609.890 Note C from City QEI .850,000 \$2,636,375 Note D from City Qualified Equity \$6,973,515 Investment Managing Milwaukee Economic MEDC Member Development Capital Fund VI, LLC Corporation (\$18,850,000) MEDC NMTC Suballocation 18 850 000 Loan to Qualified **Active Low Income** Community Business Century City Loan Proceeds \$3.295.375 Project Costs/Uses Sources of Repayment \$15.054.625 Land Sale Century City

## Summary

- ▶ \$18,850,000 NMTC transaction.
- After the 7-year compliance period, the structure can then be disassembled, land conveyed to the library, lease terminated, etc.
- Monetized NMTC effectively become a "grant" at the end of year 7 providing about \$3,300,000 (after all costs) towards projects.
  - Reduces projected gap on Century City project
  - Reduces up front cost of Villard Library by City
- CCRC established and could be used for additional NMTC's at Century City.
- CCRC model could be used for other major City redevelopment projects.
- Complex structure, mitigated by experienced parties that understand each other (MEDC, City, RACM, US Bank).