EFFECTIVE USE OF TAX INCENTIVES WITHIN GREATER PHILADELPHIA

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INTRODUCTION

This brochure is one in a series of Municipal Implementation Tools available to local governments and planning partners to assist in implementing the region's long-range plan, *Connections: The Regional Plan for a Sustainable Future*. Prepared and adopted by the Delaware Valley Regional Planning Commission (DVRPC), the long-range plan provides a sustainable land use and transportation vision for the region's growth and development through the year 2040. *Connections* establishes four key strategies that are essential to realizing a sustainable future:

- Managing growth and protecting natural resources;
- Developing livable communities;
- Building an energy-efficient economy; and
- Establishing a modern multi-modal transportation system.

Municipal governments have the primary authority and responsibility to implement these policies. The Municipal Implementation Tool (MIT) series is designed to introduce local officials and citizens to planning techniques that may be useful in their communities. Each covers a different topic and provides an overview of the use of the tool, the benefits, and best practices from within the Greater Philadelphia region. For additional information about DVRPC and the *Connections* planning process, please visit www.dvrpc.org/Connections. To learn about and download additional brochures, visit www.dvrpc.org/municipaloutreach.

Beginning in the 1970s, levels of government have been authorized to provide financial incentives as a market-based solution to achieve a more even distribution of investment. Government leaders have felt the need to relinquish short-term tax revenues in the hope that businesses lured by incentives will serve as the backbone for long-term economic growth. If such strategies succeed, they retain the ability to reinvigorate existing communities and promote denser living and working arrangements consistent with smart growth principles. Competition for new businesses is high and economic development officials often use the same strategies. Careful use of physical and financial incentives can level the playing field, while misusing incentives can leave a community fiscally vulnerable. Incentives can be used to increase profitability or defray costs. The proper incentives may convince developers to invest in an older downtown.

This MIT outlines a number of tax incentive programs currently used or have been used in the DVRPC region. The list is by no means exhaustive, but should provide a general sense of the types of incentives, whether based on national, state, or local frameworks, used by municipalities to generate economic development.

What are Tax Incentives?

An incentive is a benefit given in order to encourage a specific outcome. Tax incentives are ways of reducing taxes for businesses or individuals in exchange for specific actions or investments on their part. They are used to encourage businesses and individuals to engage in behavior that positively benefits the community. Tax incentives are offered by all levels of government that levy taxes: federal, state, county, or municipal. They can be aimed at businesses, organizations, or individuals-basically any entity that pays taxes. Tax incentives take one of three forms:

1. Tax Deductions: A tax deduction allows you to subtract some or all of your expenses for certain items from your taxable income. Taxes become lower because you are taxed on a smaller amount. The Keystone Opportunity Zone in Pennsylvania is an example of a tax deduction incentive program.

2. Tax Credits: A tax credit allows you to subtract some or all of your expenses for certain things from the amount of taxes you have to pay. Your taxes are lower because you are paying less, even though you are taxed on the full amount. Low-income housing tax credits as administered through the New Jersey Housing and Mortgage Finance Agency (NJHMFA) or the Pennsylvania Housing Finance Agency (PHFA) are examples of tax credit incentive programs.

3. Tax Reductions (Abatements): In exchange for a particular return or certain investment, you do not have to pay part or all of your taxes, usually for a specified amount of time. Your taxes are lower because they do not have to be paid. Abatements are commonly used by municipalities to encourage large scale residential and business development. The City of Philadelphia offers a comprehensive tax abatement program to homeowners and businesses.

When is a Tax Incentive the Answer?

Tax incentives can be tailored for specific types of investments and goals.

1. **Manage Growth:** Tax incentives can encourage development in areas where growth should be directed by preserving open space, spur redevelopment of brownfields and foster affordable housing. In rural areas, tax incentives can be used to create environmentally-friendly tourism such as bicycle touring or farm stays.

2. **Revitalize Neighborhoods or Downtowns:** Tax incentives can be written to attract new jobs, develop mixed income housing, or to bring in a new downtown anchor (museum, a sports facility, or relocate a municipal building).

3. **Meet Community Needs and Goals:** Tax incentives can be used to develop affordable housing (equity), increase educational options (quality schools), create jobs (employment), and enhance multimodal transportation options (healthy communities).

4. **Encourage Environmentally-friendly Practices:** Tax incentives can help promote sustainable practices and encourage green building regulations such as solar or green roofs.

Types of Federal Tax Incentive Programs

New Market Tax Credit Program (NMTC): The goal of the program is to spur revitalization efforts in low-income communities. Unlike a tax deduction, which only lowers the pre-tax income, the New Market Tax Credit is applied after taxes have been calculated, making it worth more than a tax deduction of the same amount. The Department of the Treasury's Community Development Financial Institution Fund (CDFI) annually allocates New Market Tax Credit equity to certified Community Development Entities (CDE). Examples of CDEs in Greater Philadelphia include the Philadelphia Industrial Development Corporation (PIDC), the Local Initiatives Support Corporation (LISC), the Reinvestment Fund, the Camden Empowerment Corporation, and the Pennsylvania Housing Finance Agency (PHFA).

In Upper Darby Township, Nolen Development Group is utilizing Low Income Housing Tax Credits awarded by the Pennsylvania Housing Finance Agency to convert the former St. Alice Social Center into a new 53- unit affordable senior housing complex. Photo source: www.facebook.com/pg/harkinsbuilders.

Low Income Housing Tax Credit (LIHTC): The LIHTC program is administered through the state's housing credit agency: the New Jersey Housing and Mortgage Finance Agency (NJHMFA) or the Pennsylvania Housing Finance Agency (PHFA). The LIHTC program provides tax incentives to encourage investors to invest in the development, acquisition, and rehabilitation of affordable rental housing. To obtain a LIHTC, an investor provides capital that will be used to support the development of low-income housing rental units. LIHTCs are calculated as a percentage of development costs incurred and are claimed annually over a 10-year period. The value of the tax credit is 9 percent or if using federal financing, the value

of the tax credit drops to 4 percent. To qualify for the credit, a project must meet the requirements of a qualified low-income project: 1) At least 20 percent of its units must be rented to households earning no more than 50 percent of the area median income; or 2) At least 40 percent of the units must be rented to households earning no more than 60 percent of the area median income.

Federal Historic Rehabilitation Tax Credit: Sometimes referred to as the Investment Tax Credit Program, tax incentives for historic preservation include a 20 percent tax credit for the certified rehabilitation of registered historic structures and a 10 percent credit for the rehabilitation of non-historic, non-residential buildings erected before 1936. The program is administered jointly with the Secretary of the Interior, the National Park Service, and the State Historic Preservation Office. To be eligible for the tax credit, the planned rehabilitation must meet the program's standards.

Located in Moorestown Township, the John C. Hopkins House was built in 1879. Today, this Second Empire style brick house is a real estate office. The costs for the rehabilitation of the property were $55,000. Using the Investment Tax Credit program (also known as the Federal Historic Rehabilitation Tax Credit), the original finishes and features were retained and repaired. Photo source: www.nj.gov/dep/hpo/3preserve/itc.htm, 2016.

New Jersey Municipal Tax Incentive Options

Five Year Exemption & Abatement Law: Otherwise known as the short-term tax abatement, the statute (N.J.S.A. 40A:21-1 ET SEQ.) authorizes municipalities to grant 5-year tax abatements in areas in need of rehabilitation. The tax abatement application is made by the developer and approved via the adoption of a municipal ordinance. Unlike the long term tax exemption law, no repayment agreement is required.

Long-Term Tax Exemption Law: Statute (N.J.S.A. 40A:20) enables municipalities to adopt legislation (by ordinance) to implement a Payments in Lieu of Taxes (PILOT) Program. The long--term tax exemption, otherwise referred to as an abatement agreement, can be applied for a maximum 30 years from the start of the project and is only available in areas having already been determined to be an area in need of redevelopment or a designated Urban Enterprise Zone (UEZ). Only approved Urban Renewal Entities are authorized to participate in this program. The PILOT agreement must set forth payments of the annual service charge in lieu of taxes that will be paid and outline if the abatement will be a flat emption and percentage of abatement or a percentage of value exemption and improvement cost abatement. The development project must be gradually phased into full property taxation in 20 percent increments.

Revenue Allocation District (RAD): RAD is New Jersey's legislation promoting tax increment financing. Authorized through statute (N.J.S.A. 52:27D-459 ET SEQ.), it provides for the establishment of a revenue allocation district if it is within an area in need of redevelopment and identified in the adopted redevelopment plan. Revenues are collected within a RAD and can be used to pay down debt. RAD bonds are commonly used to pay for infrastructure, streets, curbing, or any other redevelopment-related purpose.

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Gloucester City is one of the region's five UEZs. Photo source: DVRPC, 2013.

Urban Enterprise Zone (UEZ):
Enacted in 1983 and administered through the Department of Community Affairs, UEZs were created to revitalize designated urban communities. To participate in the UEZ program, communities must be approved by the Department of Community Affairs. Currently the DVRPC region has 5 UEZs: Camden City, Gloucester City, Mt. Holly, Pemberton, and Trenton City.   UEZ incentives include reduced sales tax on purchases, financial assistance through the New Jersey Economic Development Authority (NJEDA), tax credit options up to $1,500 for each new permanent full-time employee, or up to 8 percent corporate business tax credit on qualified investments.

Grow New Jersey Assistance Program (GROW NJ): Introduced through the New Jersey Economic Opportunity Act of 2013, Grow NJ is a job creation incentive program. Tax incentives are available to companies who wish to locate in a qualified incentive area. To be eligible for the tax incentive, the company must demonstrate that the tax credit is a "material factor" in the company's decision to invest in this location and prove that the capital investment and the eligible jobs created yield a net positive benefit of at least 110 percent of the requested tax amount. Qualified incentive areas include Mega Projects (projects in an Urban Transit Hub or area in need of redevelopment in Burlington, Camden, or Gloucester County of the DVRPC region), the Garden State Growth Zones (Atlantic City, Camden, Trenton, Paterson, and Passaic) or distressed municipalities as determined by the Municipal Urban Aid Program.

Economic Redevelopment and Growth Program (ERG): Introduced through the New Jersey Economic Opportunity Act of 2013, the ERG offers tax incentives for developers and businesses to receive gap funding in residential and commercial development projects. Residential projects may receive a 20 percent maximum tax credit with a 10 percent bonus if at least 10 percent of the units are moderate income housing. Commercial projects may receive a maximum 20 percent tax credit. Garden State Growth Zones (Atlantic City, Camden, Trenton, Paterson, and Passaic) may receive an additional 20 percent tax credit and other eligible distressed communities may receive an additional 10 percent tax credit.

Brownfield Site Remediation Fund: The Brownfield Site Remediation Fund provides developers up to 75 percent of their remediation costs through redevelopment agreements with the New Jersey Economic Development Authority (NJEDA) and the State Treasurer. Reimbursement payments are derived from specific State tax revenue from the redevelopment project.

Neighborhood Revitalization Tax Credit Program (NRTC): NRTC provides a 100 percent tax credit to nonprofit entities implementing comprehensive revitalization plans. Nonprofit entities must use at least 60 percent of the tax credit funds for housing and economic development and the remaining funds may be used for supportive services and other activities that promote neighborhood revitalization.

Isles, Inc., a Trenton-based nonprofit, received a $985,000 Neighborhood Revitalization Tax Credit (NRTC) in 2014 for improvements to the City of Trenton's Old Trenton neighborhood including upgrades to R. Clemente Park (shown). Photo source: www isles.org/events/roberto-clemente-park-grand-re-opening#.WHPbUVMrLAU, 2017.

Pennsylvania Municipal Tax Incentive Options

Quakertown Borough used LERTA as an incentive to revitalize the downtown with new businesses. Photo source: DVRPC, 2015.

Local Economic Revitalization Tax Assistance (LERTA): Enacted in 1977, LERTA encourages property owner-initiated redevelopment, as opposed to municipal-driven. Through LERTA property owners still pay taxes on the land and only receive a tax exemption on improvements to the property. The LERTA tax exemption is graduated but lasting no longer than 10 years. Municipal governing bodies and taxing authorities can customize the legislation to fit their specific needs. An authorizing ordinance is required and must include a description and defined boundaries of each LERTA district, the cost of the improvement, and a fee structure and exemption schedule. The governing body and taxing authorities have the authority to either exempt the actual cost of the improvement or set a predefined maximum cost to be exempt. Most importantly, the tax exemption can only be used for deteriorated commercial or industrial properties.

To encourage downtown development and residential infill, Phoenixville officials adopted a LERTA ordinance in 2010. Currently under construction on Bridge Street, the Phoenixville Village Apartments are a $35 million, mixed-use development that will add 275 housing units as well as 20,000 square feet of retail space. To keep the theme of the downtown brand, the new building will illustrate the Phoenix. Photo source: www.phxvillage.com/phoenix-village-phoenixville-pa/gallery, 2016.

Keystone Innovation Zone (KIZ): Created in 2004, KIZs were designed to address the lack of entrepreneurial activity and knowledge growth around Pennsylvania's research and development clusters. Pennsylvania has 29 KIZs established near higher education institutions. Young companies (operating 8 years or less) that locate within KIZs may receive a tax credit equal to 50 percent of the increase in their gross revenue in the immediately preceding taxable year attributable to activities in the KIZ, over the company's gross revenue attributed to activities in the KIZ in the second preceding taxable year.

Keystone Opportunity Zone (KOZ): Authorized in 1998, KOZs are specific commercial or industrial areas with reduced or no tax burden for property owners, residents, and businesses. Binding ordinances and resolutions are passed granting the waiver, abatement, or exemption of certain state and local taxes. Depending on the situation, the tax burden may be reduced to zero through exemptions, deductions, abatements, and credits for various state and local taxes.

Keystone Special Development Zone (KSDZ): The KSDZ is an incentive-based tax credit program established to foster redevelopment and encourage for-profit business to locate and operate in designated brownfields that have undergone remediation and cleanup. Eligible sites must be designated a Special Industrial Area, for which the Department of Environmental Protection (DEP) has executed a Special Industrial Area Consent Order and Agreement, and have no permanent vertical structures or the structure has been abandoned for at least 20 years. For a business to be eligible to receive KSDZ tax credits, employees must work at least 35 hours/week and spend at least 90 percent of their time working at the KSDZ location. Up to $2,100 per-job tax credit is available to approved businesses operating within a KSDZ for up to ten years.

Transit Revitalization Investment District (TRID):

Shown is a former industrial site identified for redevelopment within the Marcus Hook Borough TRID. Photo source: Marcus Hook TRID Financing Plan, Urban Partners, Brown & Keener, IBI Group, July 2009.

TRID Act Omnibus Amendments (Act 151) was signed into law by Governor Wolf on November 4, 2016 and will take effect on Feb. 2, 2017. It reforms and modernizes the original TRID Act of 2004. The Act's original purpose was to encourage private development at mass transit hubs through establishing value capture areas as a means to reserve and use future, designated incremental tax revenues for public transit capital improvements, related site development improvements and maintenance. However, only one TRID has been created in the past decade – making it clear the law needed to be improved.

The new act clarifies and updates existing language and provides for the establishment of a TRID Fund by the PA Treasury for the purpose of providing grants to two TRIDs of up to $350,000 per annum, as well as possible subsequent grants to other TRIDs. A management entity may apply to DCED for the purpose of funding an eligible project or for covering debt service payments related to debt incurred to fund an eligible project. Provisions related to the value capture areas have been clarified to permit taxing bodies to dedicate a portion of the incremental tax revenues to the TRID as opposed to the entire amount. Project costs and financing shall be similar to the provisions found in PA's Tax Increment Financing (TIF) Act of 1990, allowing a public transportation agency, municipality, management entity or a designated agent to issue bonds, deposit money into the TRID account, and enter into any contracts or agreements necessary or convenient to implement TRID project plans. The incremental tax revenue generated by a TRID property may be directed for use in TRID projects for up to 20 years.

City Revitalization Improvement Zone (CRIZ): Created by Act 52 of 2013, CRIZ aids struggling Pennsylvania cities to spur economic growth. CRIZ designates an area for revitalization and uses future tax revenue from the development to finance future development (tax increment financing). Funds can be used for infrastructure improvements or payment of debt service. CRIZ development sites can take place in any part of the city, up to a maximum of 130 acres. A five-member contracting authority, named by the city, is tasked with the financial and planning decisions for the CRIZ. Eligible areas must be a city, county, or third class city with a population of at least 30,000. CRIZ is intended for use in two eligible Pennsylvania communities every several years.

The above diagram outlines Lancaster City's CRIZ. CRIZ funds will help bring much-needed affordable housing and a full-service grocery store to Lancaster's southeast neighborhood. The Spanish American Civic Association (SACA) will put $3.4 million of CRIZ money toward accrued debt from acquiring the land for the project. The retail component of the 5.9 acre mixed-use project will consist of the 10,000 square foot international grocery store as its centerpiece, as well as a relocated Chinese restaurant and Dollar General store. The project is expected to increase the amount of healthy and affordable food choices for nearby residents and strengthen the character of Southeast Lancaster. Photo source: www.lancasteronline.com.

Municipal Tax Incentives

Business Improvement Districts (BID): Often known as special financing districts, whereby businesses elect to self-impose a surcharge on their tax bill to fund enhancements for that specific area. BIDs can be used to generate revenue, especially in areas where new development is unlikely or where the municipality wants to limit extra fees as an incentive for infill development.

Tax Increment Financing (TIF): TIF promotes redevelopment in underutilized or blighted areas by borrowing against the additional tax revenue (increment) a potential project is expected to create. TIFs do not require raising property taxes. Both New Jersey and Pennsylvania provide for the use of TIF, although the legislation differs slightly between the two states. TIF devotes the projected tax revenue increase from development to the project itself. This marginal increase in assessed value is known as the ‘tax increment.’ However, a TIF may be only used as a financing scheme in neighborhoods that are deemed to be ‘blighted.’ The duration of the TIF generally runs 20–25 years, though longer terms are possible. TIF has been used for various redevelopment projects within the City of Philadelphia such as the conversion of the old PSFS building into the Loews Hotel, the Courtyard Marriott, and two parking garages on Filbert Street.

Tax Abatements: Abatements encourage new construction or rehabilitation of properties with the exemption of all or part of the value of the improvement for a set number of years. In the late 1990s (and expanded in the early 2000s), the City of Philadelphia developed a comprehensive ten-year property tax abatement for improvements to where all improvements remain untaxed for ten years, following completion of said improvements. The City offers several abatements available to anyone (homeowners or businesses) who can present a building permit. Most notably are Ordinance 961 that offers a10-year abatement for existing residential rehabilitation, capped at $50,000 of total value and Ordinance 1456 that provides uncapped 10-year abatement for new residential construction. As a result, new construction increased 417% in Philadelphia county from 2002-2004. (*Kevin C. Gillen, Ph.D., April 2013, “Philadelphia’s Tax Abatement Program*”)

Establishing Tax Incentives

Below are suggested guidelines for establishing tax incentives:

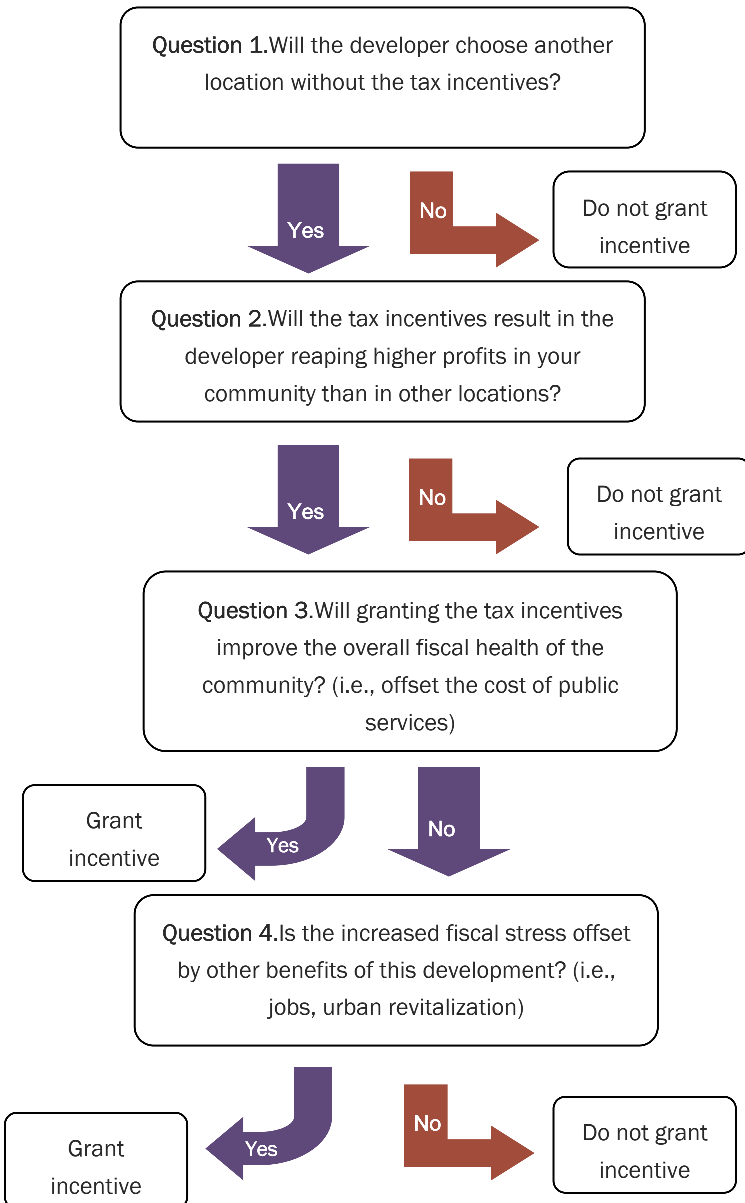
- Establish policies before receiving requests to set expectations.
- Do not rely on the developer's analysis of what incentives are needed. Have an independent party review the developer's projection of tax and sales revenue.
- Require the developer to argue his or her case, including substantiating the financial projections.
- Consider "look back" provisions, which permit the amount of the incentive to be reexamined during the course of a project.
- Avoid up-front payments. Developers often want financial incentives early, but if the project falls through or generates less money than expected, the municipality may not recoup its costs.
- Work with a successful developer. Require background information and visit other projects that he/she has completed.

Provide incentives *only* if the project could not proceed without them.

Evaluating Tax Incentives

There are two questions local officials should first contemplate when considering tax incentives: 1) where and how to apply the tax incentive to get the desired results and 2) how to convince policymakers to put a particular tax incentive in place. Since tax incentives can be used in a variety of situations, it is important to make sure the redevelopment goal can be reached by implementing this particular tax incentive. Figure 1 illustrates various considerations before granting a tax incentive.

Figure 1: Criteria for Granting Local Tax Incentives



Source: Kenyon, Langley, & Paquin, "Rethinking Property Tax Incentives, pg. 61).

Municipal Investments

Attracting development starts with making community investments. Not only does this show commitment toward growth for potential developers, but it can reduce potential costs to the private developer. Municipal investments can come in the form of process investments, such as streamlining the permit process, or investing in public infrastructure such as the streetscape or parks. Local governments should prioritize their municipal investments based on the vision and redevelopment goals of their community.

Concerns Associated with Tax Incentives

Tax incentives can have a significant number of drawbacks. It is certainly possible for incentives to be used on a development that would have occurred anyway, in which case the temporary abdication of tax revenue by the municipality is unnecessary and wasteful. In addition, incentive programs are plagued by a lack of transparency. Officials have little access to information about an incentive program, making it more difficult to conduct quantitative evaluations and generate a list of best practices. Fragmentation among tax collecting bodies in a municipality strains coordination between them, and often burdens some sectors, such as schools, more than others. Finally, tax incentives are met with some citizen opposition arguing that abatements only benefit already well-to-do developers. Competition among municipalities for private investment may induce a “race to the bottom,” where communities constantly try to under-cut one another by offering more generous tax packages to businesses, resulting in net negative fiscal outcomes.

In order to address these concerns, municipalities should seek to provide tax incentives strictly when it would not occur otherwise. Incentive packages should not be more generous than is necessary and should only be deployed in truly blighted areas. Engagement with all interested stakeholders should be a requirement in order to increase transparency and public input. A full cost-benefit analysis should be conducted prior to the offer in order to determine the potential success or failure of the project.

Conclusion

Tax incentives are important tools for municipalities to attract private investment to underdeveloped areas, generating infill development and strengthening existing communities. Though tax revenue will be foregone in the short-term, new development has the potential to create lasting economic growth in struggling districts and to create positive spillover effects to the surrounding neighborhoods. However, incentives should only be deployed when development would absolutely not occur otherwise and in an open and transparent manner.

The programs described in this pamphlet do not represent a comprehensive list of tax incentive schemes utilized in the DVRPC region. Rather, they are intended to provide a brief overview of the various types of programs implemented in this region, and to illustrate the abundance of incentive packages available to municipalities. Municipal officials should contact the appropriate state agency for more information about the programs listed in this brochure or refer to DVRPC's municipal resource guide available at www.dvrpc.org.

Sources

Council for Community and Economic Research. 2012, October. "Confessions of a Serial Tax Abater." Journal of Applied Research in Economic Development, Volume 9.

Delaware Valley Regional Planning Commission (DVRPC). 2008, August. Financing Mixed-Use Development. Philadelphia, PA: DVRPC.

Dsouza, Brigid. 2014, January. "Tax Abatements 101: A Basic Overview." Accessed October 2016. http://civicparent.org/2014/01.

Fisher, Mary, and Treba Marsh. 2015. "Tax Abatements: Evaluation and Reporting." Journal of Accounting and Finance 15(5): 54–65.

Gillen, Kevin C., Ph.D., "Philadelphia's Ten-Year Property Tax Abatement: Updated Statistics on the Size and Distribution of Tax-Abated Properties in Philadelphia." April 2013.

Keynon, Daphne A., Adam H. Langley, and Bethany P. Paquin. 2012. "Rethinking Property Tax Incentives for Business." Policy Focus Report, Lincoln Institute of Land Policy.

Office of the State Comptroller. 2010, August. "A Programmatic Examination of Municipal Tax Abatements."

Stecker, Sarah. 2010, September. "The Good, the Bad, and the Ergly." New Jersey Policy Perceptive. 1-20.

Work Group for Community Health and Development, University of Kansas, Community Tool Box. "Using Tax Incentives to Support Community Health and Development." Chapter 25, section 3. Accessed October 2016. http://www.ctb.ku.edu/en/table-of-contents/implement/changing-policies/tax-incentives/main.

Urban Land Institute. 2016. "Reaching for the Future: Creative Finance for Smaller Communities." http://uli.org/centers-initiatives/reaching-future-creative-finance-smaller-communities.

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