



NH & RA ANNUAL MEETING  
NEWS & NOTEWORTHY – INNOVATIVE CASE STUDIES  
HISTORIC TAX CREDITS  
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# Historic Tax Credit Coalition (HTCC) Update

The HTCC is a diverse group of industry stakeholders that recognize the importance of the federal Historic Tax Credit (HTC) and work with Congress and the Executive Branch to improve and expand the use of this important economic development tool.

- *Historic Preservation and the Federal Historic Tax Credit program: Addressing Challenges of the 21<sup>st</sup> Century*
  - Good overview of the history of the program
  - Frequent User Survey
  - Recommendations for improvements
  - <https://www.historiccredit.com/resources>
- Legislative Update
  - Revise HTC-Go for 2025
  - New Democratic champions
  - LIHTC specific issues
  - Basis Adjustment Amendment
  - ADVISORY COUNCIL ON HISTORIC PRESERVATION HOUSING AND HISTORIC PRESERVATION POLICY STATEMENT Adopted December 22, 2023

# Case Study: Section 202 Housing and the National Register

Program grew out of the 1955 Governor's Conference which published a report which identified the needs to address the country's aging population.

At its inception, the Section 202 program provided direct, low-interest loans to non-profit sponsors to build elderly housing projects. This first phase of the program (1959 – 1974) resulted 289 projects and 42,737 units.

A surprising trend emerged during this period: church-sponsored or religious non-profits taking the lead in the development of elderly housing.

# Baptist Terrace, Orlando, FL

Baptist Terrace, located in Orlando, Florida, is a 14-story, concrete high-rise apartment building constructed between 1968 and 1970 in the International Style. The building is eligible for listing at the local level under **Criterion A** for significant contribution to community development in Orlando, Florida. This non-profit project was the last affordable rental apartment tower for seniors constructed in Orlando's central business district during the decade of 1960 to 1970.

The completion of Baptist Terrace marks the end of Orlando's initial Section 202 housing efforts. Section 202 of the Housing Act of 1959 allowed non-profit organizations to obtain financing through the Federal Housing Administration; however, it was not until the Housing Act of 1961 that funds were actually appropriated for this purpose.



# Baptist Terrace, Orlando, FL



Baptist Terrace upon completion.  
Source: Orlando Sentinel, March 8,  
1970.

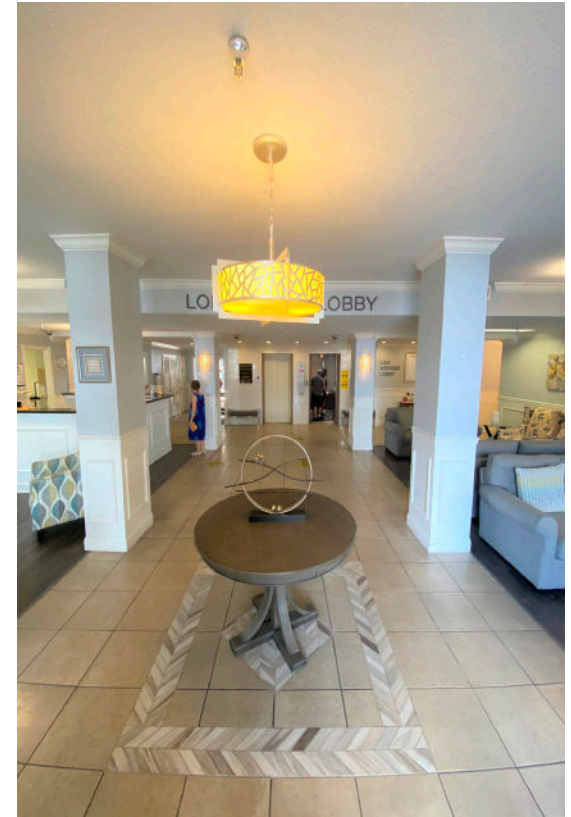


Baptist Terrace Apartments, South Facade, 2023

# Baptist Terrace, Orlando, FL

This was a moderate rehab with \$17.25 million in QREs generating \$3.4 million in federal HTC's. Project started with no HTCs but pursued them as gap filler.

(FL does not have a state HTC program though there is one proposed and working its way through the legislature)



# Section 202 Multiple Property Documentation Form (MPDF)

The National Register of Historic Places Multiple Property Documentation Form (NPS 10-900--b) nominates groups of related significant properties. On it, the themes, trends, and patterns of history shared by the properties are organized into historic contexts and the property types that represent those historic contexts are defined.

The Multiple Property Documentation Form is a cover document and not a nomination in its own right, but serves as a basis for evaluating the National Register eligibility of related properties. It may be used to nominate and register thematically-related historic properties simultaneously or to establish the registration requirements for properties that may be nominated in the future. The nomination of each building, site, district, structure, or object within a thematic group is made on the National Register Registration Form (NPS 10-900).\*

\*National Register Bulletin 16B *How to Complete the National Register Multiple Property Documentation Form*

## Section 202 MPDF – Atlanta, GA

All properties included in this MPDF are high-rise towers, constructed within the City of Atlanta, during the first two phases of the Section 202 program, inclusive of the five-years-long Section 236 program period. These two phases are defined by HUD as beginning in 1959 and ending in 1980. While the Section 202 program continues to the present day, after 1980, a “cost containment” policy was adopted, and large, high-rise projects were not funded. Therefore, the first two phases of the Section 202 program, and its short-term replacement, Section 236, provide a unique set of parameters in which to evaluate these projects.

Additionally, these ten properties were sponsored by non-profit, religious organizations comprised of local churches. Data indicates that a significant number of the non-profit sponsors participating in the Section 202/236 programs were affiliated with churches or religious organizations.



## Section 236

The Housing Act of 1968, referred to as President Lyndon Johnson's "Magna Carta", attempted to create better incentives for the private development of affordable housing. Section 236 provided FHA mortgage insurance on privately financed projects, as well as a subsidy for nonprofit sponsors to pay the differential between private financing rates and the much lower governmental financing rates.

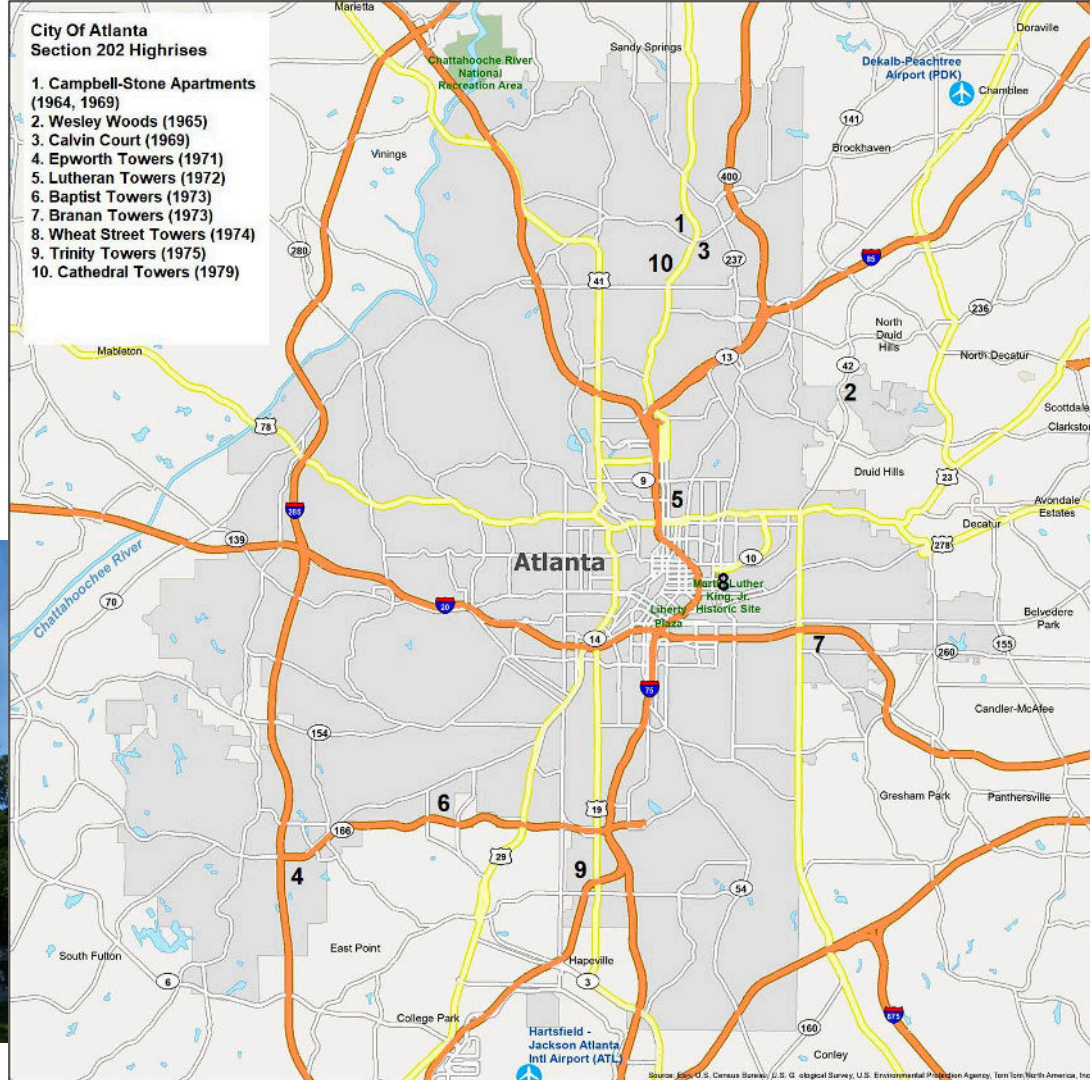
Initially, this program was intended to work in tandem to the Section 202, but in 1969, Congress voted to defund the popular elderly housing program. A scandal quickly ensued. After two years of operation, the cost of the program was estimated at a staggering \$26 billion, a significant increase over the \$50 million appropriated for the Section 202 program in 1959.

In August 1974, Congress passed the Housing and Community Development Act, restoring Section 202 funding. \$800 million was earmarked for the program, and \$100 million from the previous program was added to the total.



### City of Atlanta Section 202 Highrises

1. Campbell-Stone Apartments (1964, 1969)
2. Wesley Woods (1965)
3. Calvin Court (1969)
4. Epworth Towers (1971)
5. Lutheran Towers (1972)
6. Baptist Towers (1973)
7. Branan Towers (1973)
8. Wheat Street Towers (1974)
9. Trinity Towers (1975)
10. Cathedral Towers (1979)



1. Campbell Stone Apartments, Buildings 1 (1964) and 2 (1969)



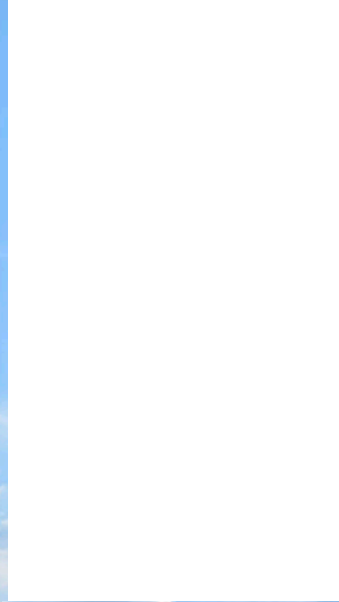
2. Wesley Woods (1965)

Source: Esri, U.S. Census Bureau, U.S. Geological Survey, U.S. Environmental Protection Agency, TomTom, North America, Inc.





3. Calvin Court (1969)



4. Epworth Towers (1971)



5. Lutheran Towers (1972)



6. Baptist Towers  
(1973)



8. Wheat Street Towers (1974)



7. Branan Towers (1973)





9. Trinity Towers (1975)

10. Cathedral Towers (1979)





# Thank you



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