News, Analysis and Commentary On Affordable Housing, Community Development and Renewable Energy Tax Credits

August 2011, Volume II, Issue VIII

Published by Novogradac & Company LLP

Futuristic Office Building Benefits from HTCs

By Jennifer Dockery, Assignment Editor, Novogradac & Company LLP

or its 50th birthday, the ASM World Headquarters, a 1959-modernist building nestled in forestland 20 miles east of Cleveland, Ohio, received a place on the National Register of Historic Places. At 52, the building, home to ASM International, the world's largest not-for-profit society serving the materials, science and engineering fields, celebrated

a second milestone—its grand reopening. After two years of renovations, led by The Chesler Group and funded in part by federal and state historic tax credits (HTCs), the futuristic building which includes a 103-foot geodesic dome that envelops a semi-circular office complex and mineral garden is ready for another 50 years.

ASM International, founded as the American Society for Metals in 1913, moved into the semi-circular office building beneath the geodesic dome in 1959. The building is part of a 45-acre campus in Materials Park, Ohio that ASM commissioned from architect John Terrance Kelly. Kelly designed the building and contracted architect, mathematician and futurist R. Buckminster Fuller to design the dome, which is constructed using 13 miles of tubular aluminum. The William Hunt Eisenman mineral garden on the building grounds features more than 66 specimens of mineral ores and 75 plant species.

Restoring an Original

Although the 250-foot diameter dome was in good shape, 50 years had taken a toll on the semi-circular office building and garden and ASM was considering relocating rather than make costly repairs. The building's systems were outdated

and parts of the glass, concrete and metal structure was in need of significant repair and restoration. Michael Chesler, of The Chesler Group, suggested nominating the building for the National Register and using HTCs to reduce the cost of replacing the building's mechanical systems with newer, more efficient models.



Photo: Courtesy of The Chesler Group

ASM International headquarters feature floor to celing glass windows and clear glass walls.

"It was a gem because no one had attempted to substantially renovate the structure and therefore all the original historic fabric was in place," Chesler said. The Chesler Group nominated the building and the National Park Service (NPS) added it to the National Register in 2009. In the application, Chesler cited the building's modern design elements,

continued from page 1

including the geodesic dome. Other modern elements in the 50,000-square-foot office building are stainless steel floating stair-cases supported by stainless steel rods running from the ground floor to the second floor, brass handrails and copper doors. The building features three floors of floor-to-ceiling windows and clear glass walls and custom fabricated stainless steel solar shades on the exterior prevent direct sunlight from entering the building except for one minute each year.

Placement on the National Register allowed ASM and Chesler to access federal HTCs and to apply for Ohio HTCs. It also meant working under the NPS's rules for renovating the building, determining which parts of the steel, glass and concrete structure were part of the building's historic fabric. NPS determined that all of the materials contributed to the historic nature of the building and, consequently, the existing floor-to-ceiling glass panels could not be replaced with newer low-emissivity windows.

"It is an incredibly unique structure. For us at the state it's a winwin," said Mark Lundine, urban revitalization coordinator for the Ohio Department of Development (ODOD), which awarded ASM with state HTCs in December 2010. Lundine noted that the significance of ASM's work – publishing reports and research for Ohio's manufacturing industry – strengthened its HTC application.

The renovations, designed by Dimit Architects and constructed by Chesler's construction division, include complete replacement of all the building's mechanical systems, including new HVAC controls and electrical, plumbing and water filtration systems. The Chesler Group cleaned and refurbished the sunscreens, installed new gaskets and seals for the plate glass windows, upgraded insulation and repaired corrosion. A concrete arch wall was repoured and the garden-level roof was completely removed and waterproofed. Soil and vegetation were added to create a green roof on the garden level.

"What we did with the building was take it back to its original intent," said Stanley Theobald, ASM's managing director. That meant opening up the floor plan, returning the building to a more neutral color palette and rehanging metals artist Bel-Jon's seven brushed aluminum murals entitled The History of Iron. The original light fixture and office chairs were also preserved.

Parker Hannifin provided \$1.1 million in equity for the federal HTCs for the \$6.2 million project. The Chesler Group kept the state HTCs, used its own equity to bridge the funding gap until it could claim the credits, and returned the credits for a refund once the project was completed. The remainder of the funding came in the form of senior debt. "We had enough capital that we didn't need [the tax credits] until the back end," Chesler said. The state credits provided an additional \$800,000 to \$900,000 of the equity that Chesler needed to complete the project. "That's the entire mecontinued on page 3

Novogradac Journal of Tax Credits Editorial Board

PUBLISHER

Michael J. Novogradac, CPA

MANAGING EDITOR

Alex Ruiz

EDITOR

Jane Bowar Zastrow

TECHNICAL EDITORS

Robert S. Thesman, CPA James R. Kroger, CPA Owen P. Gray, CPA Thomas Boccia, CPA Daniel J. Smith, CPA

ASSIGNMENT EDITOR

Jennifer Dockery

STAFF WRITER

Jennifer Hill

CONTRIBUTING WRITERS

Brandi Day Brad Elphick Kristina Garcia Owen P. Gray John Leith-Tetrault Forrest David Milder Lisa Pekkala Charlie A. Rhuda III Martin Ricketts Daniel J. Smith Tom Stephens Amanda Talbot John Tess Eric Usinger Tara M. Woody Miao Xue

PRODUCTION

Jesse Barredo James Matuszak

Novogradac Journal of Tax Credits Information

Address all correspondence and editorial submissions to:
Alex Ruiz/ 415.356.8088

Address inquiries regarding advertising opportunities to: Emil Bagalso / 415.356.8037

Editorial material in this publication is for informational purposes only and should not be construed otherwise. Advice and interpretation regarding the low-income housing tax credit or any other material covered in this publication can only be obtained from your tax advisor.



Novogradac & Company LLP 2011 All rights reserved. ISSN 2152-646X

Reproduction of this publication in whole or in part in any form without written permission from the publisher is prohibited by law.

Novogradac Journal of Tax Credits Advisory Board

LOW-INCOME HOUSING TAX CREDITS

Bud Clarke BOSTON FINANCIAL INVESTMENT MANAGEMENT Jana Cohen Barbe SNR DENTON Tom Dixon BOSTON CAPITAL Valerie White STANDARD & POOR'S CORPORATION Rick Edson HOUSING CAPITAL ADVISORS INC. Richard Gerwitz CITI COMMUNITY CAPITAL Rochelle Lento DYKEMA GOSSETT PLLC John Lisella U.S. BANCORP COMMUNITY DEV. CORP. Phillip Melton **CENTERLINE CAPITAL GROUP Thomas Morton** PILLSBURY WINTHROP SHAW PITTMAN LLP Stephen Ryan COX, CASTLE & NICHOLSON LLP **Arnold Schuster SNR DENTON** Rob Wasserman U.S. BANCORP COMMUNITY DEV. CORP.

PROPERTY COMPLIANCE

Rose Guerrero California tax credit allocation committee Sharon Jackman SIG SERVICES LLC Michael Kotin **KAY KAY REALTY** Michael Snowdon MCA HOUSING PARTNERS Gianna Solari SOLARI ENTERPRISES **Ruth Theobald Probst** THEOPRO COMPLIANCE & CONSULT. INC. Kimberly Taylor HOUSING DEVELOPMENT CENTER

HOUSING AND URBAN DEVELOPMENT

Sheldon Schreibera PEPPER HAMILTON LLP Monica Sussman NIXON PEABODY LLP

NEW MARKETS TAX CREDITS

Frank Altman **COMMUNITY REINVESTMENT FUND** Bruce Bonjour **PERKINS COIE LLC** Neil Kimmelfield **LANE POWELL** Marc Hirshman U.S. BANCORP COMMUNITY DEV. CORP. Scott Lindquist **SNR DENTON Ruth Sparrow FUTURES UNLIMITED LAW PC** Herb Stevens NIXON PEABODY LLP Mary Tingerthal HOUSING PARTNERSHIP NETWORK Tom Tracy **HUNTER CHASE & COMPANY** Joseph Wesolowski Enterprise community investment inc.

HISTORIC TAX CREDITS

Don Holm **FARRIS BOBANGO BRANAN PLC** John Leith-Tetrault NATIONAL TRUST COMM. INVESTMENT CORP. Bill MacRostie MACROSTIE HISTORIC ADVISORS LLC Donna Rodnev BRYAN CAVELLE John Tess **HERITAGE CONSULTING GROUP**

RENEWABLE ENERGY TAX CREDITS

Ed Feo **USRG RENEWABLE FINANCE** Michael Hall **BORREGO SOLAR SYSTEMS** Jim Howard **DUDLEY VENTURES** Forrest Milder NIXON PEABODY LLP Darren Van't Hof U.S. BANCORP COMMUNITY DEV. CORP. continued from page 2

chanical system for the building," he said. It allowed Chesler to buy a highly efficient system for the building that could compensate for the energy lost through the non-low-E glass windows.

A Complicated Structure

The Chesler Group and ASM worked with Novogradac & Company to set up a new entity as the owner of the building. The entity is leasing the space to ASM International and other tenants. Community groups and others can also rent common areas and meeting rooms in the building, many of which include high tech equipment. The public can access the grounds and a mineral garden.

"The whole team ... had to work through the structure, create new entities," said Renee Beaver, a partner in Novogradac & Company's Cleveland office. She said that the team worked closely with the state to ensure that the building renovations qualified for the tax credits. "The goal was to leverage the subsidies as much as possible."

Final Touches

ASM and two other tenants moved into the building the week of July 5 and it was expected that the grounds would reopen to the public this month. In addition to access to the gardens, the public will be able to rent conference rooms and access the lobby area. At press time, a grand opening had been scheduled for August 6. 🏖

This article first appeared in the August 2011 issue of the Novogradac Journal of Tax Credits.

© Novogradac & Company LLP 2011 - All Rights Reserved

Notice pursuant to IRS regulations: Any U.S. federal tax advice contained in this article is not intended to be used, and cannot be used, by any taxpayer for the purpose of avoiding penalties under the Internal Revenue Code; nor is any such advice intended to be used to support the promotion or marketing of a transaction. Any advice expressed in this article is limited to the federal tax issues addressed in it. Additional issues may exist outside the limited scope of any advice provided – any such advice does not consider or provide a conclusion with respect to any additional issues. Taxpayers contemplating undertaking a transaction should seek advice based on their particular circumstances.

This editorial material is for informational purposes only and should not be construed otherwise. Advice and interpretation regarding property compliance or any other material covered in this article can only be obtained from your tax advisor. For further information visit www.novoco.