

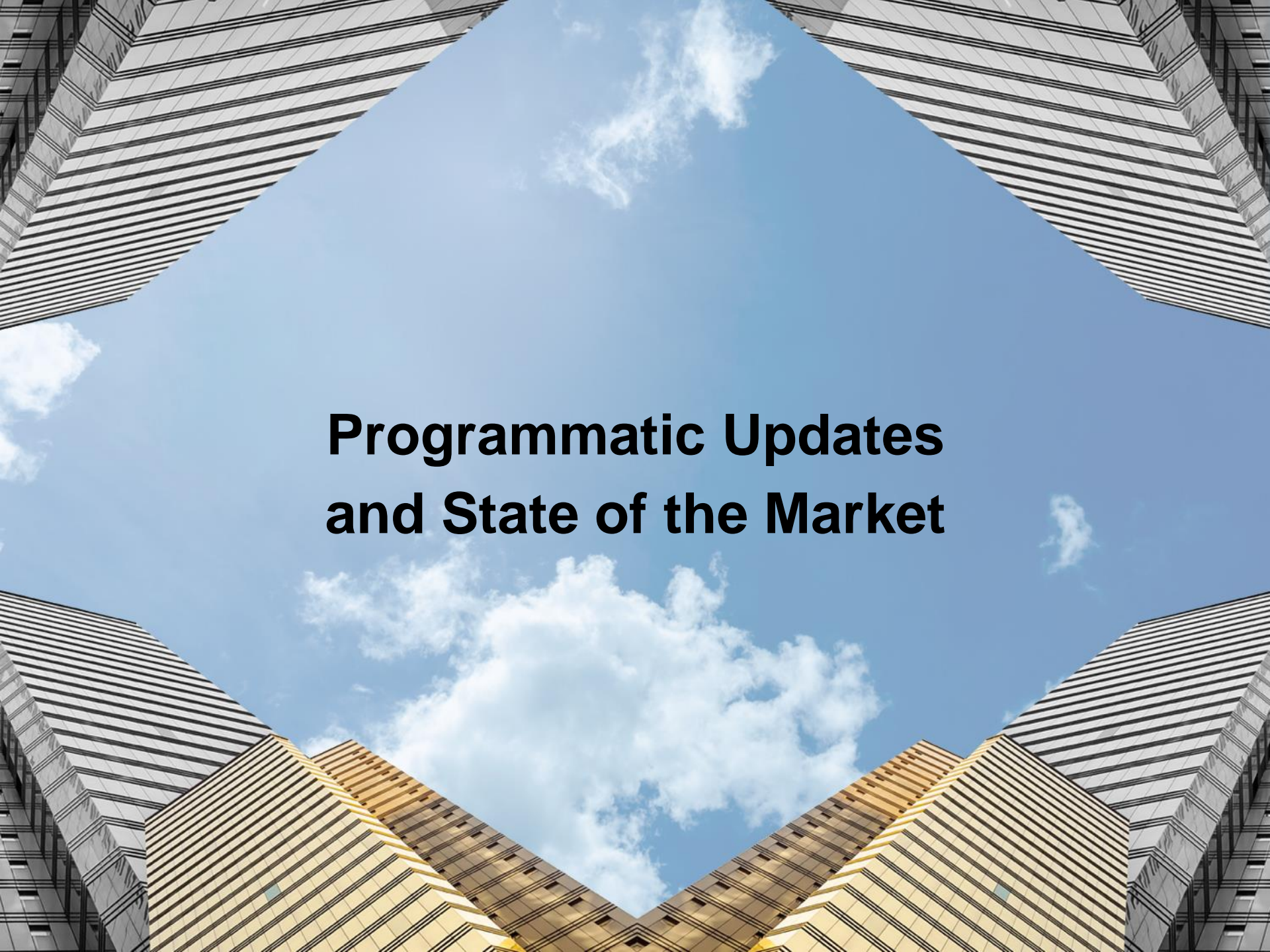
# Qualified Opportunity Funds And Complimentary Tools

Utilizing Qualified Opportunity Funds to  
Support Development and P3 Projects

James Lang | [langjim@gtlaw.com](mailto:langjim@gtlaw.com) 813.318.5731

DECEMBER 18, 2018

[www.gtlaw.com](http://www.gtlaw.com)



# **Programmatic Updates and State of the Market**

# Updates

---

- Proposed Regulations – October 19, 2018
- Revenue Ruling 2018-29
- Executive Order on Establishing the White House Opportunity and Revitalization Council (December 12, 2018)
- Future Proposed Regulations/Guidance





# Project Capital Stacks

# Capital Stacks

---

- Debt
  - Conventional Loans
  - Bonds/PABs - Private Activity Bond Application
- Equity
  - Conventional Sponsor-side Equity
  - Tax Equity
- Grants
- Qualified Opportunity Funds



# **Qualified Opportunity Zone Businesses**



# QOZBs and P3

---

- Private Capital Solution to Public Need
- Attracting Alternative Forms of QOF Capital
- Establishing a QOZB: Requirements
- Structuring equity and debt in a QOZB P3 Project
- Nature of Qualified Opportunity Fund Equity into a QOZB P3 Project
- Stadiums, Transit Centers, and Traditional Location Based P3 Projects

# Application

---

- Stadium Development
- Preferred Equity Investment
- Option Unwinds
- Combination with Bonds/Forward Purchase Agreements/TIF
- Upside Potential for Investors
- 2026 Benefit
- Post 10 Year Tax Benefit
- Refinance Considerations





# **Affordable Housing and Renewable Energy**

# Affordable Housing

---

- Utilization with Tax Equity (LIHTC)
- Utilization by General Partner for Equity Contribution
- Less Expensive “Equity” or replacement for other subsidies
- Future expansion of incentives for O-Zones?

# Renewable Energy

---

- Utilization with Tax Equity
- Equipment Application (and limitations)
- 2026 Benefit





# **State and Local Applications**

# State Application

---

- Tie in to existing or new incentive programs
- Scoring criteria
- Targeted industry or job creation focus
- State program?

# Local Governments

---

- Community Planning, Land Use, and Zoning
- Opportunity Zone Branding
- Marketing/Opportunity Identification
- Local Incentives
- Local Opportunity Funds/Community Impact Funds





**GT** GreenbergTraurig

James O. Lang

813.318.5731

langjim@gtlaw.com