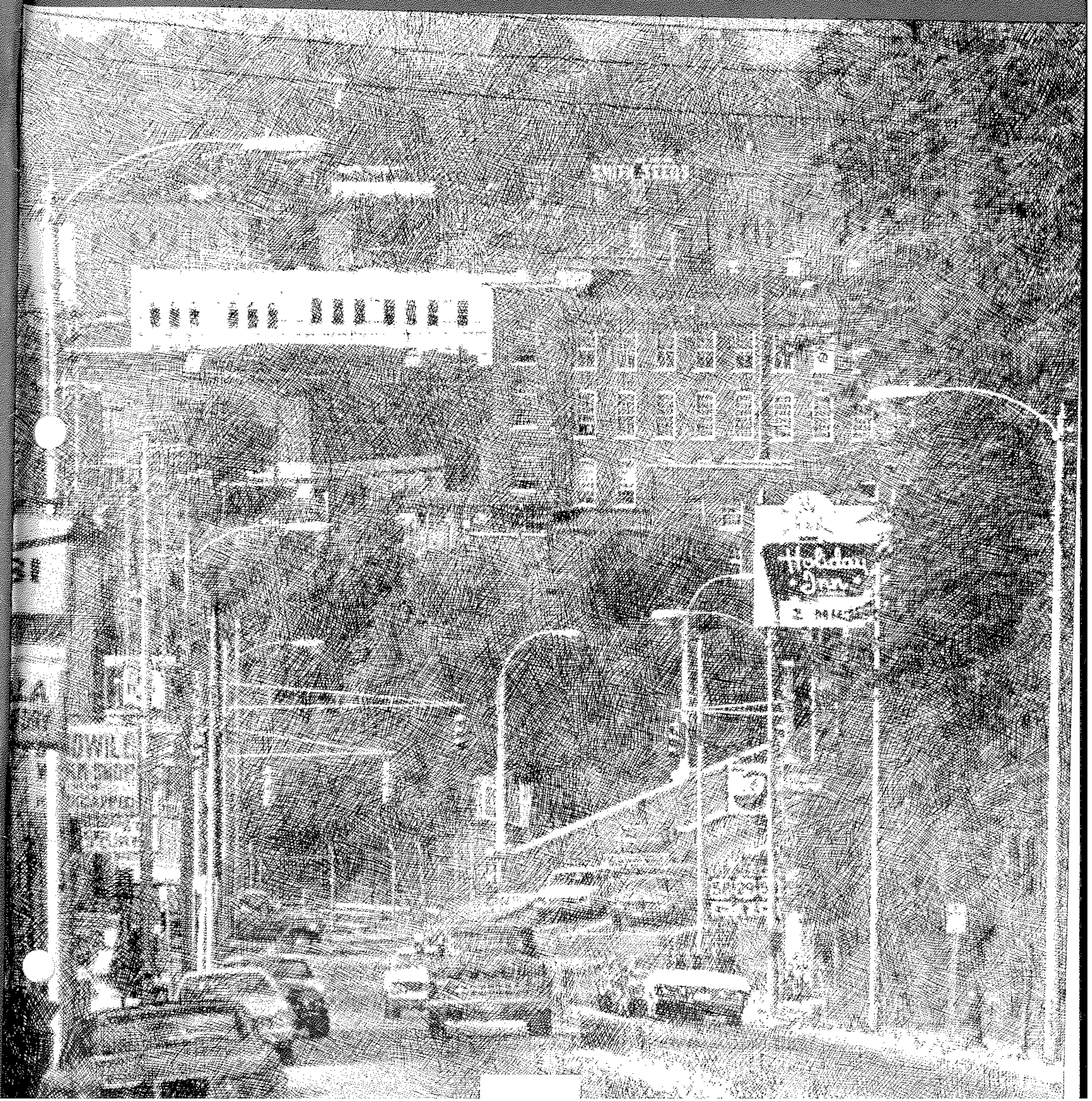
Library

December 1979

Urban Land

ULI

Action Plan for Historic Danville



Urban Land

Issue at a Glance **Volume 38 No. 11 December 1979**

URBAN LAND: Published monthly, July and August issues combined, by ULI–the Urban Land Institute, 1200 18th Street, N.W., Washington, D.C. 20036.

SUBSCRIPTION RATES: Subscription to *Urban Land* is included in annual Member and Associate dues. Yearly subscription rates for nonmembers are as follows: $30 (U.S.A.); $35 (Canada and Mexico); $40 (all other countries).

REPRINTS: Permission to reprint articles from *Urban Land* is generally given provided permission is requested in writing from ULI.

EDITORIAL: Editor welcomes unsolicited manuscripts and photographs. Manuscripts submitted for possible publication in *Urban Land* should be typewritten, double-spaced, and submitted in duplicate. Authors take full responsibility for the authenticity of their articles and must secure any required consents or releases from any other publisher or other person owning the rights of copyright thereto. Address all correspondence to: W. Paul O'Mara, Editor, ULI–the Urban Land Institute, 1200 18th Street, N.W., Washington, D.C. Tel. (202) 331-8500.

LETTERS: The opinions and views expressed in articles appearing in *Urban Land* are those of the authors and do not necessarily represent those of ULI–the Urban Land Institute. Comments from our readers are invited. Short letters have the greatest chance of being published.

Urban Land is catalogued under the International Standard Serial Number: ISSN 0042-0891.

Frank H. Spink, Jr., Director of Publications
W. Paul O'Mara, Editor
Nadine Huff, Editorial Associate
Libby Howland, Abstracts Editor
Carolyn de Haas, Art Director
Robert L. Helms, Production Manager
Patricia E. Thach, Production Assistant

Historic Preservation Tax Incentives

Sally G. Oldham

Across the nation there is tremendous interest in development circles in the attractive tax provisions that are now available for rehabilitation of historic buildings. Many articles have been published explaining the applicability of the tax incentives, and time has been devoted to them at local, regional, and nationwide meetings of attorneys, developers, bankers, planners, and architects.

The incentive provisions, included in the Tax Reform Act of 1976 and jointly administered by the Department of the Interior and the Department of the Treasury, are still too new to allow for reflective analysis of their impact upon the nation's development activity. Nevertheless, they were enacted for only a 5-year period, though, reportedly, legislation will be introduced early in 1980 to extend the provisions several years beyond their current 1981 expiration date. Congress is already asking questions about their usefulness and their success in fulfilling Congress' goal of enlisting private funds in efforts to rehabilitate and preserve historic structures and neighborhoods.

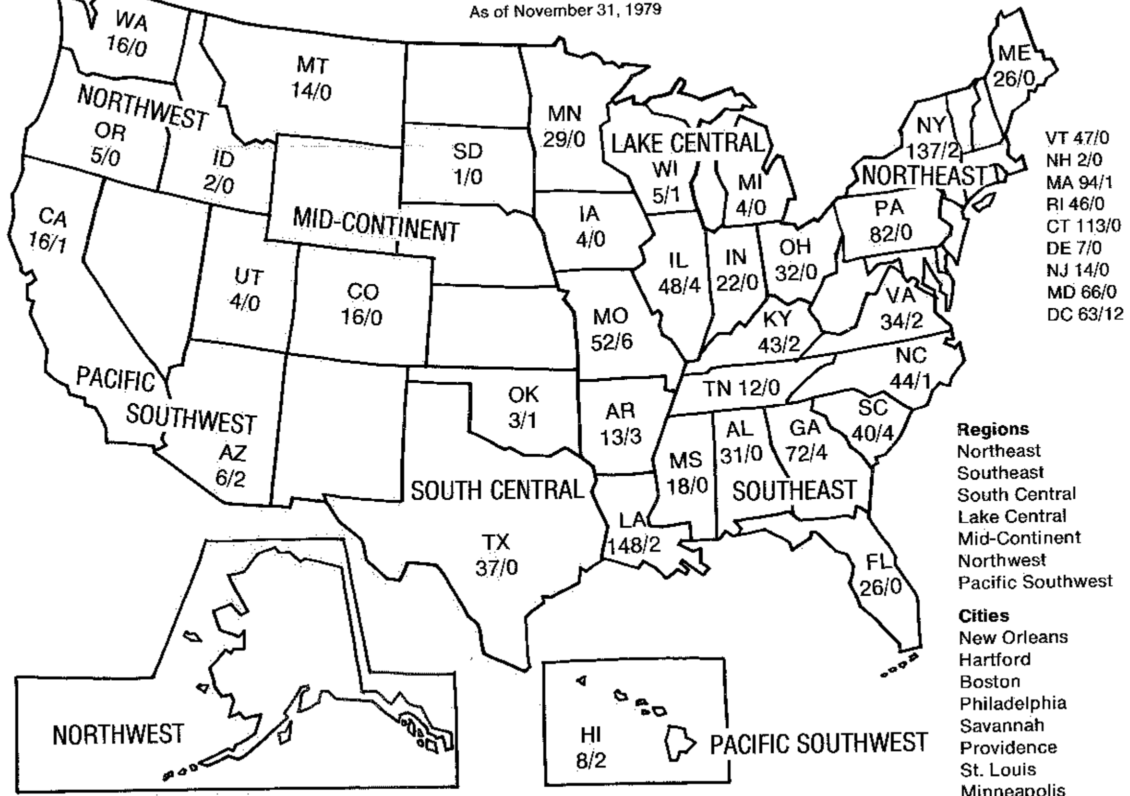
How many owners/developers have applied for project approval? Is usage of the provisions concentrated in one section of the country? Are the provisions encouraging developers to rehabilitate historic buildings instead of building anew? Is the qualifying process cumbersome? Is an owner/developer very restricted in design solutions or in the addition of new floor area to an old building?

A discussion of these issues and of many others that have arisen regarding the tax provisions can be found in a newly released Department of the Interior publication, *Federal Tax Provisions to Encourage Rehabilitation: An Assessment of Their Effect*, (available from the Superintendent of Documents, Government Printing Office, Washington, D.C. 20402, Stock No. 024-016-00122-6; $4.). The Heritage Conservation and Recreation Service, the bureau responsible for Interior's historic preservation programs, assembled this report at the request of the Oversight Subcommittee of the House Ways and Means Committee. It includes information on HCRS' experience with administering the certification process by which judgments are made as to which rehabilitated buildings qualify for the tax incentives. It also incorporates information, including numerous direct quotations, on the experiences and opinions of present and potential beneficiaries of the program—owners and long-term lessees who have requested certification, landmarks commissions, preservation organizations, State Historic Preservation Officers, and tax attorneys and real estate consultants who have come into contact with HCRS. The information was largely gathered from questionnaires returned to HCRS (over 450) after a mailing early in 1979.

In December 1977, *Urban Land* published the first major magazine article in the nation dealing with the newly-enacted federal tax incentives. At that time only 25 projects had been submitted for review to the Heritage Conservation and Recreation Service. Now, 2 years later, hundreds of projects have qualified for the accelerated tax write-offs, and the construction costs of projects requesting approval total more than half a billion dollars. Projects involving approximately 2,000 historic structures located in 46 states have been approved or are at some stage in the approval process.

The incentives have encouraged large- and small-scale projects. They have proven useful in raising equity capital for large projects and in improving cash flow projections for owners of small commercial enterprises in need of refurbishing. A wide variety of types of structures have come in for review under the certification program—schools, mills, churches, office buildings, rowhouses, even the *Santa Rosa*, a double-ended ferryboat placed in service on the San Francisco Bay in 1927, which was the first steel-hulled, diesel electric ferryboat to operate on the bay.

CERTIFICATIONS/DECERTIFICATIONS OF HISTORIC SIGNIFICANCE
As of November 31, 1979



Regions	
Northeast	731/17
Southeast	286/11
South Central	201/6
Lake Central	140/5
Mid-Continent	91/6
Northwest	23/0
Pacific Southwest	30/5

Cities	
New Orleans	138
Hartford	92
Boston	41
Philadelphia	40
Savannah	35
Providence	27
St. Louis	41
Minneapolis	17

Participating States	46
Total Certifications	1,502
Decertifications	50

CERTIFICATIONS OF REHABILITATION APPROVED*/DENIED
As of November 31, 1979

Regions	
Northeast	427/42
Southeast	193/13
South Central	105/7
Lake Central	81/8
Mid-Continent	91/3
Northwest	23/0
Pacific Southwest	34/3

Total Approved *(proposed & final)	954
Denied	76

Participating States 48

New uses for these structures vary widely, but fully 60 percent of the projects involve housing units. Eighty percent of the total number of units are new ones and 25 percent of them are for low- and moderate-income occupants. Eighteen percent of the projects reviewed by HCRS involve other direct or indirect federal subsidies in addition to the accelerated tax benefits—Section 8 housing subsidies, Community Development Block Grants, Department of the Interior grants-in-aid for preservation projects, Small Business Administration Loans, Department of Commerce Section 312 loans, and others.

Four out of five of these projects, then, involve no other federal assistance, but the owners/developers have deemed it worthwhile to pursue the tax incentives. Understanding that a developer will choose to submit to the minimum possible number of reviews by outside agencies in order to avoid project delays, this statistic perhaps indicates both the broad applicability of the tax write-offs as well as the fact that many developers have decided this is one hurdle that's worth crossing.

The Tax Provisions

The tax provisions include a 5-year write-off of allowable rehabilitation expenses, generally all costs associated with improvements within the four walls of the structure, including plumbing, heating, and air conditioning costs. Modernization of these systems is as important a factor to the continued usefulness of a historic building as repairs to 19th century moldings or retention and repair of architectural features such as hoodmolds and elaborate cornices are to the continued historic significance of a building. Costs that can be written off include the construction costs for the rehabilitation plus architectural and engineering fees, real estate commissions, site survey fees, legal fees, and insurance premiums.

The second of the tax incentives allows the use of accelerated depreciation of the adjusted basis plus rehabilitation costs on substantially rehabilitated property, defined as property where the allowable rehabilitation costs exceed the adjusted basis of the property or $5,000, whichever is greater.

Two provisions to discourage the demolition of historic structures were included in the Tax Reform Act of 1976. These include the denial of deductions for demolition costs and any remaining undepreciated basis in a building (these amounts must be added to the land basis) and the denial of accelerated depreciation on new construction when on the site of a certified historic structure that has been demolished or substantially altered.

A third tax incentive available for rehabilitation is a 10 percent investment tax credit for buildings 20 years or older which was included in the Revenue Act of 1978. This tax credit applies to both historic and nonhistoric buildings. It can be combined with the historic structures accelerated depreciation provision but not with the 5-year write-off.

Eligibility For The Tax Write-Offs

Eligibility for the tax provisions is based upon listing in the National Register of Historic Places and state or local historic district designations. Properties eligible for the 1976 tax incentives and affected by the demolition provisions include ones that are depreciable and are individually listed in the National Register of Historic Places, and properties located within registered historic districts that have been certified as contributing to the significance of those districts. The National Register of Historic Places is the official national list of properties that should be saved from destruction, damage, or decay, and receive certain protective and economic benefits. Nominations to the National Register are made through State Historic Preservation Officers (SHPOs) appointed by the state governors. There are about 20,000 listings in the National Register now and 10 percent of these are historic districts. It is estimated that 700,000 to 1 million buildings are included in National Register listings.

In addition to National Register districts, registered historic districts include state or locally designated districts when the ordinance under which the district is designated has been certified by HCRS and when the district itself has been certified as substantially meeting National Register criteria for evaluation. At a series of regional seminars held in the spring of 1979, which were sponsored jointly by the American Planning Association and the Heritage Conservation and Recreation Service, planners were very intrigued by the possibilities of incorporating historic districting and the tax incentives into their plans to revitalize downtowns and neighborhoods.

HCRS is responsible for four certification processes for the tax provisions: certification of statutes, certifications of local districts, certifications (and decertifications) of significance, and certifications of rehabilitation. All certification requests are submitted first to the appropriate State Historic Preservation Officer who forwards them to HCRS with his or her recommendation.

To date 88 statutes have been certified making several hundred local historic districts and many thousand buildings within those districts eligible for the tax treatments once the districts themselves have been certified. Statutes are reviewed to determine that they contain provisions which will serve to preserve and encourage rehabilitation of buildings of historic significance to a district. Generally, the statute should provide for a review board or commission with the power to review proposed alterations to structures within designated districts.

Local districts are reviewed using the criteria for the listing of districts in the National Register of Historic Places. A district is generally a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of buildings, open spaces, engineering structures, and the like, united by past events or aesthetically by plan or physical developments. Often a city planning department or local historic preservation commission interested in encouraging the rehabilitation of certain buildings will undertake the background work necessary to qualify a local district for the tax provisions.

The Application Process

A two-part application form (the Historic Preservation Certification Application available from the SHPO) is used for certifications of significance and rehabilitations. Requests for certifications of significance (Part 1 of the application) are evaluated against three criteria to determine whether a building within a district contributes to the significance of the district (see p. 7). Buildings which add to the district's character, whether they are buildings which stand out individually or which form the historic matrix of the district, will be certified. Buildings of recent date, ones which detract from the overall historic quality of the district, and ones which have lost their architectural and historic qualities through major alterations will be decertified (so that the demolition provisions will not apply if the buildings are removed).

Requests for rehabilitation certification (Part 2 of the application form) are evaluated against 10 standards, the Secretary of the Interior's Standards for Rehabilitation (see p. 10). These are broadly worded principles designed to guide an owner/developer/architect in planning a viable rehabilitation project while retaining the historically significant features of a building.

Applications can be made for buildings not yet listed in the National Register of Historic Places so long as the State Historic Preservation Officer attests that the property appears to meet National Register criteria for evaluation and that he or she intends to nominate it. Once preliminary approval of the rehabilitation plans is obtained and the requirements of the Internal Revenue Service are met (IRS interim regulations, 26 CFR Parts 1 and 7, were published in the Federal Register August 30, 1978; final regulations are forthcoming), the owner or lessee is able to begin tax deductions and has 30 months to have the property listed and then to receive final rehabilitation certification.

Time restraints are always of great importance to a developer. Requests for certification are generally processed within 45 days at the state level, and a similar period of time at the federal level. Applications can be processed quickly if the information requested is complete. Photographs are generally the most useful tool to communicate both the building's relative contribution to the district's street appearance and plans for repairs and alterations to the building. Interior and exterior photographs before rehabilitation is begun should be included with the application. Photographs can be marked to show proposed or completed rehabilitation work. Certification is based on an overall assessment of a project and covers permanent and temporary construction on the exterior and interior of historic buildings as well as attached or adjacent new construction and site improvements.

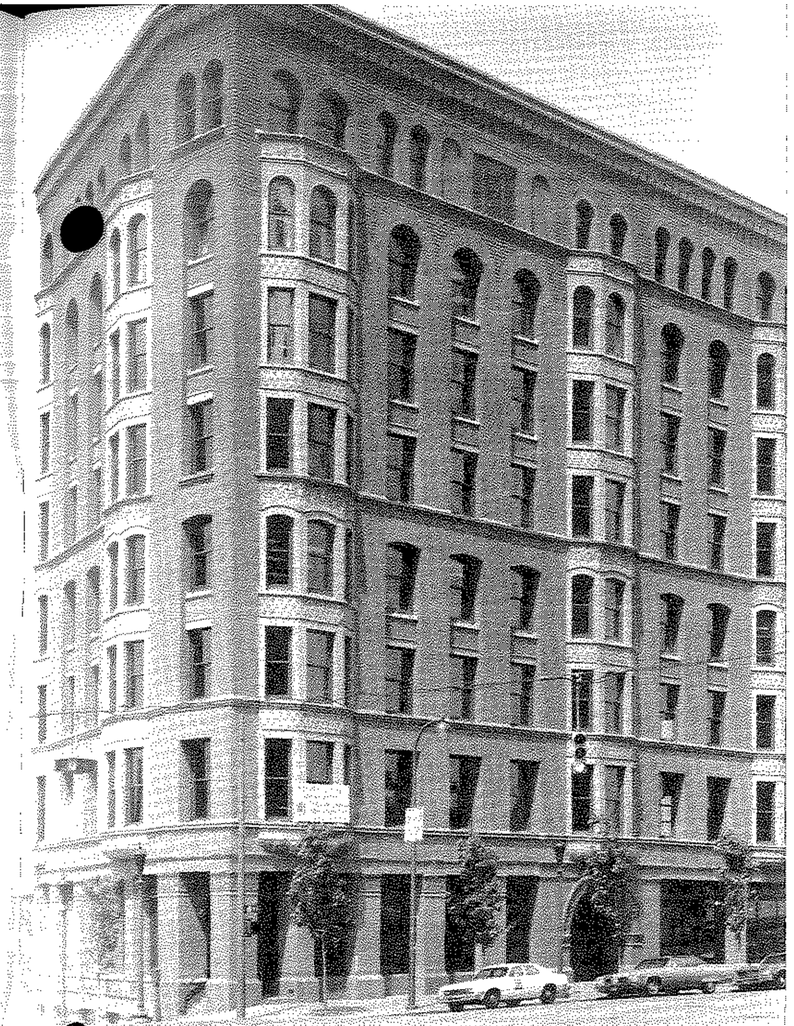
Applicants are encouraged to apply early for preliminary approval so that project plans will meet the Secretary of the Interior's standards. This can avoid costly review delays late in a project if information is incomplete, and can allow for easy adjustments to a project if necessary to meet the standards. If changes are made to project plans after preliminary approval is received, these should be submitted to the State Historic Preservation Officer and HCRS for review. If the project is carried out in accordance with the approved plans, it will be certified upon completion.

Approved projects include the $2 million rehabilitation of Carr Mill in Carrboro, North Carolina, a turn-of-the-century textile mill redeveloped as a shopping mall and office space. The new Fairmount Hotel in Philadelphia is the recycled Bellevue-Stratford Hotel, an early 20th century landmark in that city. The owners' interest in undertaking the $15.8 million project was sparked by the 5-year write-off provision.

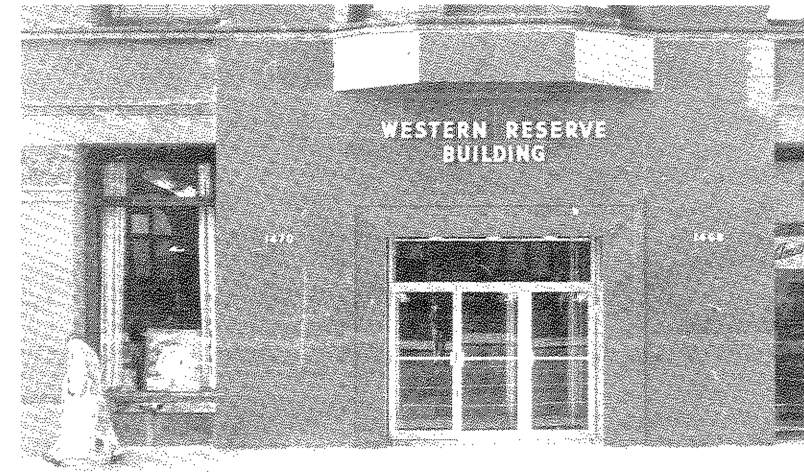
In downtown Hartford, Connecticut, a massive housing rehabilitation project involving over 50 buildings and $8.5 million in private investment is currently underway using the historic preservation tax write-off as a means of raising equity for the project. The Congress Street project spans two National Register historic districts and involves a derelict neighborhood of single-family homes and apartment buildings dating from the 1850s to the 1920s. The completed project will provide 253 new housing units and 33,350 square feet of commercial space.

In Sweetwater, Texas, the R. A. Ragland Building, a 2-story stone and brick structure, constructed in the early 20th century by a prominent pioneer, is being rehabilitated for office space by reinforcing the structural system, cleaning the masonry, and restoring the storefront to its original appearance. In Portland, Oregon, the Old Portland Machinery Company Building, located within the Skidmore Old Town District, is being rehabilitated for professional offices. The $555,000 project includes steamcleaning the sand-colored brick and installing new glass in existing wooden frames.

A more complete description of two other projects may help to make clearer both the possible financial packaging of a continued use project and the potential for historic buildings to be successfully incorporated into and to greatly enhance a larger development scheme including substantial new construction.



Left, *The Western Reserve Building in Cleveland by Daniel H. Burnham is being rehabilitated by Higbee's Department Store.* Below, *modernized entranceway contrasts with original design in left photo.*

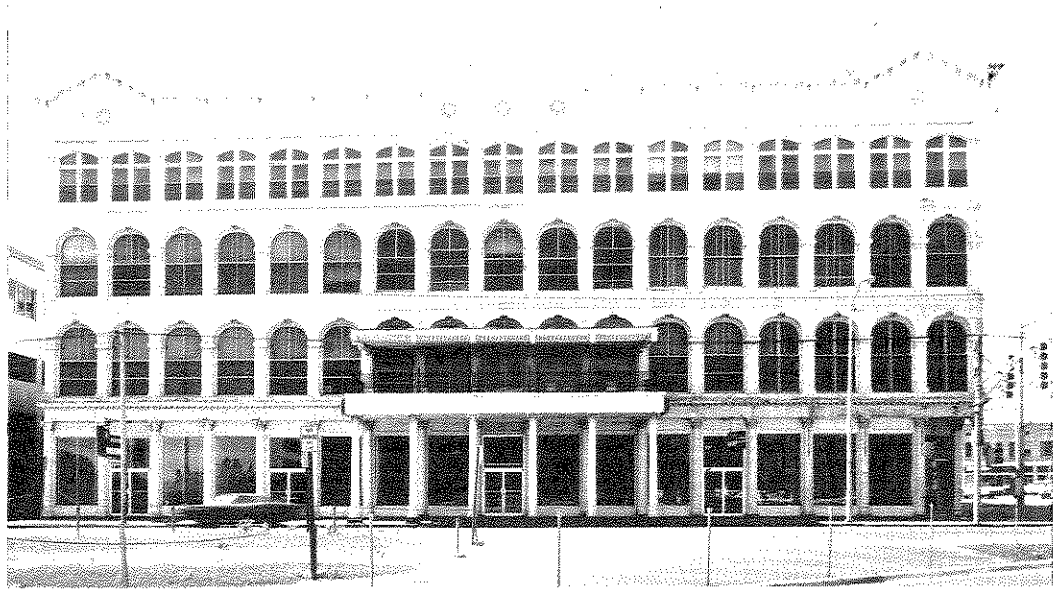


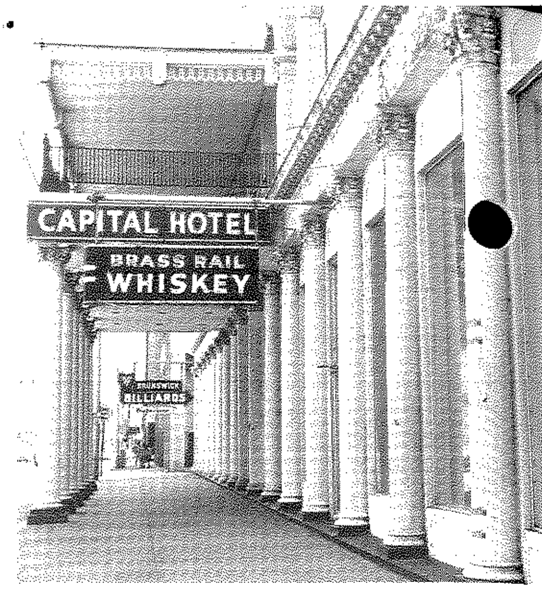
The Secretary of the Interior's Standards for Evaluating Structures within Registered Historic Districts

a. A structure contributing to the historic significance of a district is one which by location, design, setting, materials, workmanship, feeling, and association adds to the district's sense of time and place and historic development.

b. A structure not contributing to the historic significance of a district is one which detracts from the district's sense of time and place and historic development intrinsically; or when the integrity of the original design or individual architectural features or spaces have been irretrievably lost.

c. Ordinarily structures that have been built within the past 50 years shall not be considered eligible unless a strong justification concerning their historical or architectural merit is given or the historical attributes of the district are considered to be less than 50 years old.





The Capital Hotel in Little Rock will undergo rehabilitation beginning in January 1980.

The Capital Hotel

The Capital Hotel in downtown Little Rock, Arkansas, located nearby the Old State Capitol building, was the city's leading hotel at the turn-of-the century and an important center of public life in the state. The building opened in 1877 as a 3-story office building with some retail space, but was soon converted to a hotel to fulfill the need for public guest accommodations. The building is of brick construction with a cast-iron facade which was purchased in New York and shipped in pieces to Little Rock for assembly. A fourth story and rear wings were added in the late 19th century. The hotel was listed in the National Register of Historic Places in 1974 for the significance of its cast-iron facade and for its important role in the public and political life of late 19th and early 20th century Little Rock.

The $6 million project is being undertaken by the Capital Hotel Partnership—Charles Bland of Grand Junction, Tennessee; Lawrence Walters of Little Rock; and Historic Ventures, Inc., also of Little Rock. The partnership is combining a variety of funding sources to finance the project. Their equity in ownership of the building should provide 20 percent of the project costs. They have secured a $1,750,000 direct fixed asset loan at 9¼ percent interest from the Economic Development Administration. And they expect that nearly half of the project costs will be financed by the sale of municipal revenue bonds which will be secured by a first mortgage lien on the project. A Department of the Interior grant for $64,000 was awarded to the project in 1979 to help finance an architectural and structural analysis of the hotel, and the partnership has applied to the State Historic Preservation Officer for another grant of $275,000 to help cover costs of the cleaning and repair of the cast-iron facade, work on the lobby, and some roof work.

The hotel, which has been closed since 1977, will depend for its business upon a $100 million convention center proposed to be constructed across the street. The hotel will provide luxury accommodations. Rehabilitation costs per room will total approximately $50,000.

The rehabilitation project is scheduled to begin in January 1980. Ed Cromwell of Historic Ventures, Inc. has already had his proposed rehabilitation plans reviewed by the State Historic Preservation Officer and by HCRS. Proposed work includes cleaning, repairing, and repainting the front facade, retaining and repairing the existing wooden window sash, installing interior storm windows, repainting the exterior masonry walls, and rehabilitating the major public areas of the hotel. Hotel rooms will be completely refurbished. A major addition of 21,000 square feet is proposed to allow for a number of rooms sufficient to make the project economically feasible. The main building is 77,000 square feet. One early design scheme proposed an addition which would have increased substantially the height of the building at the rear which potentially could have had an adverse impact upon the scale of the historic building and would have required the destruction of some historic fabric. Fortunately, however, the developer was able to lease from a bank the air rights on the land abutting the rear facade of the hotel and now plans to add a new wing to the hotel at the rear. The new wing will maintain the original height of the hotel and will be raised on piers to allow the bank's parking lot to be located beneath it. HCRS commended the partnership for this innovative solution to the need for additional floor area.

In reviewing other aspects of the project, HCRS recommended tuckpointing only where necessary rather than tuckpointing of entire masonry walls, and it recommended retention of the historic metal awning on the second story porch on the front facade.

The Capital Hotel Partnership expects to have the hotel in operation by December 1980, creating 140 to 150 new jobs in downtown Little Rock. A representative of the developer has indicated that the tax provisions are an important factor in drawing investors to the project.

The Flour Mill

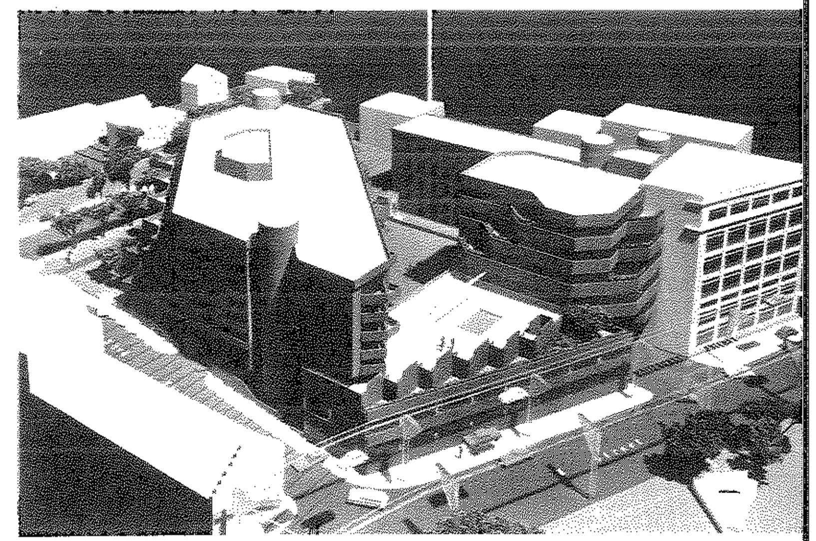
Real estate development in Washington, D.C. is currently a booming business. One of the most interesting projects now under construction is the Flour Mill, a mixed-use project incorporating some 200,000 square feet of condominium, office, and retail space. The project, which involves four primary structures and a parking garage, includes the adaptive use of the 19th century brick Bomford Mill and the early 20th century Flour Mill. The Bomford Mill, the last operating mill on the Georgetown waterfront at the time of its sale in 1977, was built in 1847 along the Chesapeake and Ohio Canal. It used the water power of the canal to mill grain transported along the canal. Milling operations were greatly expanded later in the 19th century and again in 1922 when the Wilkins-Rogers Milling Company took over. The Flour Mill building was constructed at this time of concrete with large windows of industrial sash.

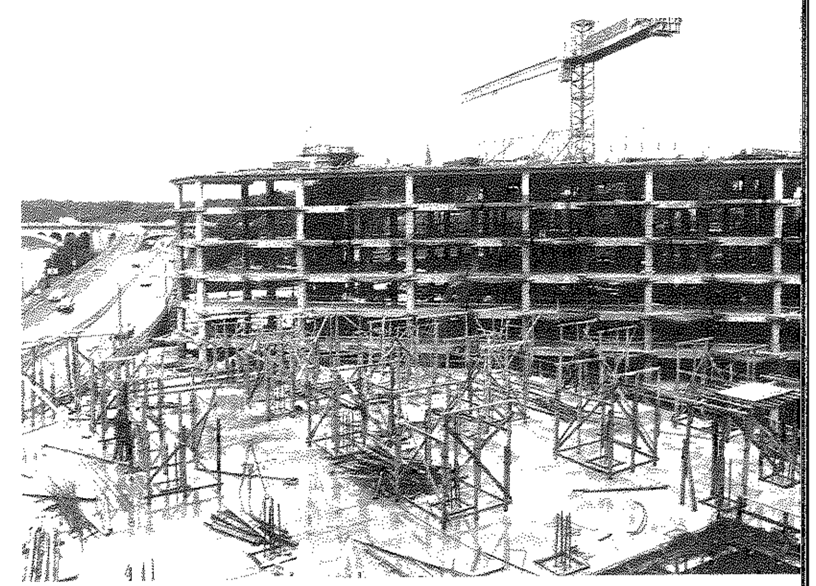
The project is located in the Georgetown Historic District and, therefore, was subject to multiple reviews, including that of the Georgetown Historic District review board, the Commission of Fine Arts, and the Joint Committee on Landmarks. Parts 1 and 2 of Historic Preservation Certification Application were submitted to the State Historic Preservation Officer and to HCRS for purposes of the tax provisions. HCRS commended the project architects, ICON (International Consortium of Architects), on a particularly sensitive job of designing new buildings containing more than three times the square footage of the old ones which, nevertheless, do not overwhelm the older structures.

The architects deemed it necessary to demolish two banks of concrete silos which were originally constructed as hollow containers with no real footings and therefore could not be reused without completely rebuilding them. ICON has drawn upon the silo theme in the design of the new elevator core which services both the Bomford Mill and the Flour Mill.

Both mills will be used strictly for office space. Georgetown's zoning requires that 50 percent of a project be housing, but architect Peter Vercelli explains that he judged that dwelling units would not be an appropriate use for the Bomford Mill because code requirements would have dictated that the historic window openings be substantially enlarged, thus changing the building's visual character. At the suggestion of the reviewing bodies, "six-over-six" sash will be retained in the Bomford Mill building in all original openings.

The industrial sash of the Flour Mill posed a problem of an opposite nature. Although HCRS encouraged retention of the large industrial sash windows to enhance the historic character of the building, the architects demonstrated that considerations of sound pollution and energy conservation precluded this. The windows, which were beyond repair, will be replaced by double-glazed, fixed panes with triple glazing at the freeway level on the K Street exposure to reduce sound transmission.





The Flour Mill in Washington, D.C. will be converted to residential, office, and retail space. Top, *model shows completed project.* Middle, *the $20 million project was begun in the spring of 1978.* Bottom, *view looking east, October 1979.*

The Secretary of the Interior's Standards for Rehabilitation

1. Every reasonable effort shall be made to provide a compatible use for a property which requires minimal alteration of the building, structure, or site and its environment, or to use a property for its originally intended purpose.
2. The distinguishing original qualities or character of a building, structure, or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible.
3. All buildings, structures, and sites shall be recognized as products of their own time. Alterations that have no historical basis and which seek to create an earlier appearance shall be discouraged.
4. Changes which may have taken place in the course of time are evidence of the history and development of a building, structure, or site and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.
5. Distinctive stylistic features or examples of skilled craftsmanship which characterize a building, structure, or site shall be treated with sensitivity.
6. Deteriorated architectural features shall be repaired rather than replaced, wherever possible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplications of features, substantiated by historic, physical, or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.
7. The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning methods that will damage the historic building materials shall not be undertaken.
8. Every reasonable effort shall be made to protect and preserve archeological resources affected by, or adjacent to, any project.
9. Contemporary design for alterations and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant historical, architectural, or cultural material, and such design is compatible with the size, scale, color, material, and character of the property, neighborhood, or environment.
10. Wherever possible, new additions or alterations to structures shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired.

Paint was removed chemically from the Bomford Mill exterior walls and they were cleaned by a waterwash method. The masonry is being repointed by a contractor experienced with historic building treatments. The architect had planned to put a waterproof coating on the exterior walls but after comments from HCRS and other reviewing bodies on the potential harmful effects that could result from not allowing moisture to escape from the brick, the architect decided instead to concentrate on improving ground drainage, repointing, installing a new roof, and repairing roof drainage to alleviate water leakage.

The structure of both mill buildings will be exposed on the interior with partitions added where necessary. The architect hopes to be able to retain gears and other industrial artifacts in place on one level of the Flour Mill. The flume which brought water from the canal to the millwheel has been exposed and will be incorporated into the landscaping of the plaza area between the buildings, serving both aesthetic and ambient sound purposes to alleviate noise disturbance from the adjacent highway.

The Flour Mill project was begun in the spring of 1978 and should be completed by the spring of 1980. Total project cost is $20,000,000. Approximately $6,000,000 of this will be spent to rehabilitate the two historic mill buildings. Project developer Marvin Weissberg says that the comments of HCRS and other reviewing bodies about the significance of the building as well as the existence of the tax incentives were influential in his decision to retain both buildings in the project.

Conclusion

The historic preservation tax incentives are proving to be a useful tool for developers in urban areas. By the end of November 1979, projected costs for projects reviewed by the Heritage Conservation and Recreation Service in the tax program totalled more than $600 million. This is a small amount in comparison with total rehabilitation costs in the country as a whole, but with the current trend toward rehabilitation due to the escalating costs of new materials and the energy conserving nature of many old buildings, as well as people's increasing concern with retaining selected significant buildings and groups of buildings to preserve our links with the past, one can expect that the popularity of the tax incentives will continue to increase.

Sally G. Oldham is acting chief of registration in the National Register of Historic Places, Heritage Conservation and Recreation Service, Department of the Interior. She has supervised the National Register's Tax Reform Act program for the past 2 years.

Action Plan for Historic Danville

James Vaseff and Timothy J. King

Despite remarkable strides taken toward a historic preservation consciousness in America during the 1970s, most segments of our society remain unaware of the social and economic benefits that have been obtained through comprehensive preservation programs in many areas of the country. We continue to witness the erosion of our cultural heritage either as a consequence of community inertia or indifference toward development. For the past several years, the Historic American Engineering Record (HAER) has assumed part of the task of breaking this trend through a series of rehab action projects. Through these innovative projects, HAER seeks to spark a preservation ethic by targeting underused industrial buildings and districts and by demonstrating procedures for adaptive use that retain historic integrity.

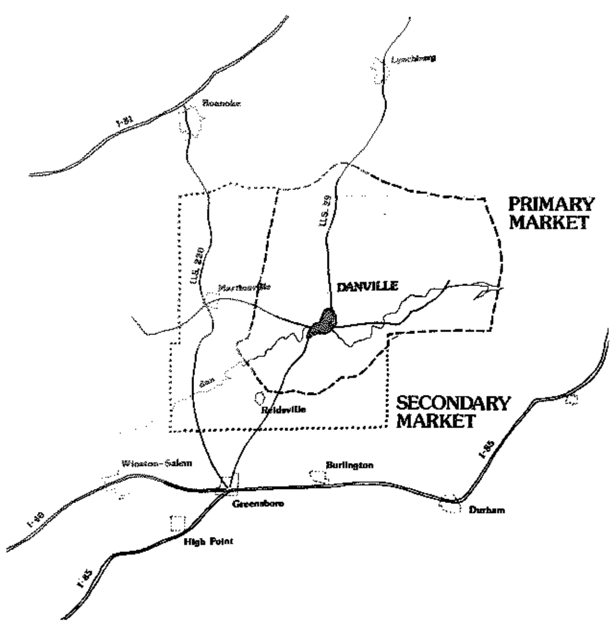
The Heritage Conservation and Recreation Service (HCRS), an agency of the Department of the Interior, administers national historic preservation programs in conjunction with other federal agencies, the states, and the private sector. The Historic American Engineering Record, one of six historic preservation programs within HCRS, provides a focus for documenting and preserving the nation's industrial and technological heritage.

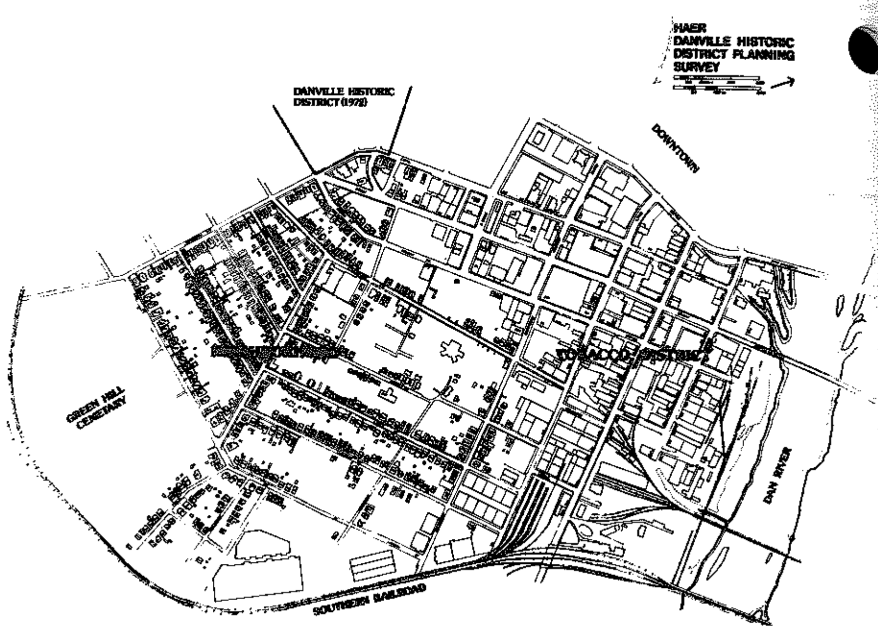
The federal government first became involved in the preservation of the built environment with the passage of the 1906 Antiquities Act. The 1935 Historic Sites Act reinforced the government's commitment to preservation. By the 1960s, a more comprehensive federal preservation program was urgently needed.

The 1966 National Historic Preservation Act expanded the interest in national historic landmarks by establishing a national register of properties important in American history, architecture, archeology, and culture. In addition, the National Register of Historic Places has become a national planning tool by establishing criteria for evaluation and by keeping a record of these historic resources. The Tax Reform Act of 1976 has stimulated the use of this inventory of historic properties by offering tax incentives for the rehabilitation of commercial properties listed in the National Register.

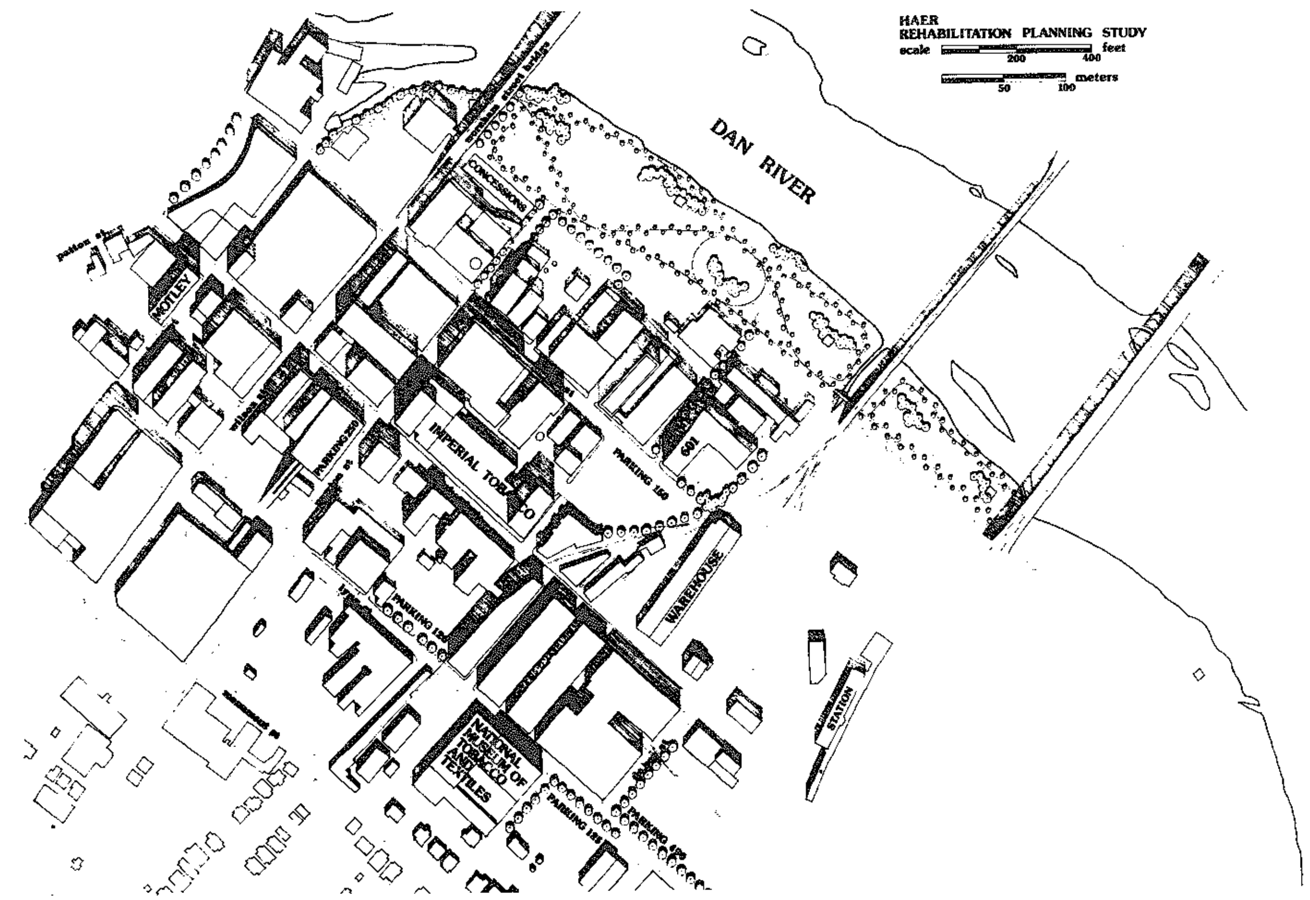
With the passage of the tax act, Congress appropriated funds to implement the preservation provisions. Using a small portion of this money, HAER added planning and adaptive use capabilities to some of its historic recording teams, which are assembled each summer to inventory, to record through measured drawings and photographs, and to document with written reports historically significant industrial processes, structures, and sites. Economic planners, urban planners, and rehabilitation architects were included on several recording teams to demonstrate the financial feasibility of rehabilitating historic industrial structures using the Tax Reform Act incentives.

During the second year of this new program, HAER conducted four rehabilitation projects as part of its inventory and recording responsibilities. Beyond simply demonstrating the benefits of the Tax Reform Act on individual structures, the projects also illustrate overall planning in a historic district, public improvements that would enhance or encourage private investment, and plausible long-range ideas for community revitalization.





Left, Danville enjoys a healthy trading position, but only draws a small percentage of shoppers from its secondary market. Above, the Danville Tobacco District and adjacent neighborhood. Opposite, the Tobacco District showing planned uses.



Goals of Rehab Teams

There are two initial goals of the rehabilitation action teams: to demonstrate the architectural and financial feasibility of adaptive use on individual structures using the preservation provisions of the Tax Reform Act; and to demonstrate urban planning with a conservation ethic that reflects the recreation and preservation interests of the Heritage Conservation and Recreation Service.

The primary purpose of the rehab teams is to demonstrate the architectural and financial feasibility of adaptive use. The planning methodology for this demonstration focuses on individual structures, thus making the planning process inductive. Structures are identified; market studies, interviews, and projects are conducted to determine suitable uses for structures; and recommendations for alterations in the urban infrastructure are made where appropriate. Showing how historic industrial structures are desirable opportunities for private investment, these rehab team projects are designed to attract private-sector capital capable of implementing a rehabilitation plan much quicker than a total program of federally subsidized development administered by a local redevelopment authority.

There is, of course, the need for government funding in projects where public improvements are part of the scope of work. This use of public improvement funds, exemplified by HUD's Urban Development Action Grants, is justified even when there is substantial private investment in an area. In such a case, the coordinated effort by the private and public sectors better assures success of the project.

Urban planning with a conservation ethic encompasses two aspects of preservation. The first is a thorough knowledge of legislation pertaining to the protection of historic resources. Most importantly, this includes laws concerning the use of federal funds in and around historic resources. For example, if the 1976 tax act provisions are to be used by a property owner wishing to rehabilitate his "income-producing" property, the work must first be certified by HCRS, thereby indicating conformity to the "Standards for Rehabilitation." (See first article.) These criteria are used to evaluate the adverse effects of the work, and they guarantee that the historic fabric of the building will not be unnecessarily altered.

The second part of the conservation ethic is responsible preservation. An HAER team addresses typical problems associated with economic development, with a bias toward preserving as much as is reasonably possible. In a historic district the entire "townscape" is understood to be historically significant. Solutions which seek a reciprocity between new needs and preservation are sought and tend to produce creative and innovative answers to these problems.

The role of the rehab team is illustrated in the following example of Danville, Virginia.

Rehabilitating the Tobacco District

At the request of the Danville City Council an HAER rehabilitation action team was assembled to assist in developing a rehabilitation plan for the city's Tobacco District.

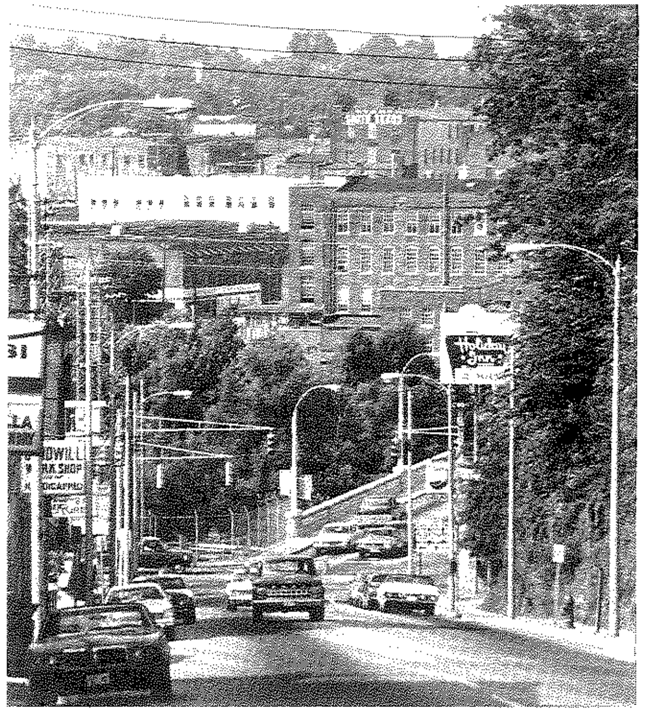
Danville, population 45,700, is located in the western uplands of the Piedmont region of Virginia on the Dan River, 2 miles from the North Carolina border. As a fall line city, Danville enjoyed some early commercial advantages, but difficult transportation routes did little to encourage development. Both Alexandria and Richmond, Virginia, were also fall line cities, but their large, direct, river outlets to the sea made them the predominant commercial cities of Virginia throughout the antebellum period.

Tobacco remained the primary crop and an item of trade throughout this period, and in 1858 the "Danville System" of tobacco inspection freed buyers from having to examine individual hogsheads by allowing the inspection and purchase of loose-leaf tobacco. During the Civil War many tobacco houses in Richmond moved their holdings to Danville for safekeeping.

The majority of Danville's Tobacco District buildings were completed between 1890 and 1929 and represent one of the most significant built environments in the city. There are approximately 100 brick and heavy timber structures in the district, and mild winters and good maintenance have preserved the structural condition of these buildings. The District also includes a neighborhood of 450 homes.

The tobacco buildings, once active factories, are now used primarily for storage with about 25 percent of the space lying vacant.

The HAER team inventoried the Tobacco District and its adjacent neighborhood. Based on their research, a National Register of Historic Places nomination was drafted for the city to submit to the state historic preservation officer. Archeologists designed a predictive model of archeological resources in the study area,


The Tobacco District as seen from North Main Street and Highway 58 as one enters Danville.

then tested it throughout the district and neighborhood to determine its validity and usefulness as a planning tool in historic areas. Architects created adaptive use designs for selected structures, determined guidelines and estimates for housing rehabilitation, and produced general graphics such as maps and charts. The planners generated market studies for housing, offices, and retail space, and investigated implementation strategies for various aspects of the plan.

Through the 12-week project, team members met with a large and diverse group of people and organizations in the city. Initially, these meetings were to obtain information and to explain generally what the project was all about. After the third week, the team began to make presentations on the findings and recommendations as they were developed. These presentations ranged from historic interpretations of the development of the district to what could be done in the near future to maintain the area's usefulness. The local press ran several newspaper articles a week, and radio and television coverage was extensive. This grassroots approach was very important for the plan's implementation, as it ensured that local citizens would be familiar with the work of the team and the recommendations of the action plan.

After each opportunity or need was defined, the team set forth to propose not only the solution but also the routes to accomplish that goal. A closer look at the action plan will illustrate the recommendations outlined by the team for the rehabilitation of the district.

Riverfront Park

The principal roads entering Danville descend to the Dan River at the Tobacco District, the historic center of the city. The view of the Tobacco District from Highway 58 and North Main Street is dramatic.

Approaching the river, this panoramic view diminishes as the wild growth of trees and underbrush along the river bank rise. Similarly, the impressive view of North Danville across the river is obstructed from the Tobacco District because of the dense vegetation. The area is a flood plain, a factor which has discouraged substantial construction. The team quickly agreed that this strip of approximately 15 acres of land fronting the river and enclosed by the developed area would make an excellent park. With the Tobacco District as a backdrop, a park would offer a new definition of the district as a place for people—an attractive space contiguous to the downtown area. With landscaping, which would enhance the view and stabilize the soil, the park would open up the Tobacco District to view from across the river, and conversely, allow a view of the river and North Danville from the district. The park would have an urban recreation focus; jogging paths, bicycle paths, fishing, canoe rentals, benches, and a physical fitness trail. A small piece of city land that remained after a recent street realignment could be landscaped to complement the riverfront park; main entry to the park from the downtown area could be channeled under the 45-foot high concrete arches of the Worsham Street Bridge. The park would extend eastward replacing a salvage yard along the riverfront and include the railyard as far south as Craghead Street. In addition, the greenery of the park would be continued into the district along three streets.

The team found that the riverfront area proposed for a park was owned by the Norfolk and Western Railroad, yet the land and its old spur line were little used and could be conveyed to the city. Federal income tax laws provide strong incentives for gifts or bargain sale of appreciated land to public or nonprofit organizations. The HCRS has a staff experienced with similar land donations for recreation purposes, who are ready to assist the city, the railroad, and other parties in negotiations. In fact, the value of the property could be used as a match for an HCRS grant to construct the proposed park. The HAER team worked closely with the city's recreation department, the HCRS regional office, and the state liaison officer to make initial contacts with Norfolk and Western. The HCRS regional office advised the city to include the Riverfront Park in their present HCRS application. In addition, the J. C. Penney Company has a national program of assistance to communities for the establishment of exercise trails, and the Danville branch was working with the recreation department to establish one of these trails in a city park. The team urged that every opportunity to develop an exercise trail in the Riverfront Park be explored.

Craghead Street

Craghead Street, a main traffic artery transversing the center of the Tobacco District, was at one time a lively commercial street bounded at one end by downtown Danville and at the other by the railroad passenger station. With the decline of passenger rail traffic and industrial employment, the street lost its commercial importance, and at present, almost all the vacant commercial space in the district is located here. Because it is a main traffic artery, many citizens of Danville drive through the Tobacco District, and public perception of the entire district as a run-down area is derived from the vacant spaces along this thoroughfare.

Craghead Street would continue to be a main traffic artery and would continue to be the first impression of the district to those who drive through it. The HAER team decided to concentrate its adaptive use studies for the district on Craghead Street properties in order to improve the image of the district at an early stage of the process, and to concentrate resources on the most economically depressed area. Architectural design and economic feasibility plans were developed for two structures, the Imperial Tobacco Company and the Motley Hardware Building. These structures would make attractive opportunities for adaptive uses that would encourage and complement the reuse of their neighbors.

The Imperial Tobacco Company spans an entire block in the center of Craghead Street. The HAER team initially proposed an outlet facility which would sell the goods of local manufacturers. After further investigation, the idea was expanded to include a major facility that could house 46 stores of various sizes.

Across the street from the Imperial Tobacco Company is the Crowell Motor Company, a 4-story, reinforced concrete structure used for warehousing. With very few changes the Crowell building could serve as a 250-car parking facility.

The five-story Motley Hardware Building is located in a distinctive block at the downtown end of Craghead Street, one block away from a new city courts building. The HAER team first proposed law offices for this structure, but after discussions with the owner, and following completion of the market studies, the plans were revised to incorporate shops and a restaurant as well as offices. While the HAER team was still in Danville, the owners of the remainder of the Motley block showed interest in the rehabilitation of their structures.

Private investment would be the primary force in the development of these properties. The income tax incentives available through Section 2124 of the Tax Reform Act of 1976 made the economic opportunities very attractive, and the recently passed Revenue Act of 1978 provided tax incentives in addition to the Tax Reform Act of 1976. The HAER team presented the results of its building studies to the owners, who were interested in the tax incentives and in the potential attractions afforded by the proposed Riverfront Park and convenient parking facilities.


Craghead Street within the Tobacco District.

Worsham Street Bridge

The Worsham Street Bridge carries traffic from Highway 29 in North Danville directly into the heart of the Tobacco District, but it is underused and carries only a very small percentage of the traffic crossing the river.

The HAER team saw that with a major factory outlet facility in the district (as proposed for the Imperial Tobacco Company building), many shoppers coming from points north could take the Worsham Street Bridge directly into the district, and park in the Crowell Motor Company garage. The Worsham Street access from the north would divert the district-bound traffic from an already strained North Main Street artery. Automobile access to the district from south of the river is via Industrial Avenue to Craghead Street and from South Main Street.

Parking

The proposed plan for new uses and additional functions in the Tobacco District anticipated a need for new automobile parking there. Existing parking consisted of marked street spaces and private lots. The HAER team's survey of parking spaces in the area showed 650 parking places evenly divided between street space and private space.

The HAER team studied lots which could serve as parking facilities for the district. The assessment focused on prime spaces (those most useful to the district) which had the best potential for conversion to parking. Five areas were identified that could supply 1,135 new spaces without destroying any major structures. These new areas, plus the existing parking in the Tobacco District, could supply a total of nearly 2,000 parking spaces, and additional locations exist which could supply parking at a later date, should more space be required.

The HAER team met with the city's Overall Economic Development Program Committee and discussed the parking assessment and a plan for action. The team also provided a list of the five prime locations, the names of the property owners, and assessed values. Cost estimates for parking conversion were made for each lot, and as a designated redevelopment area, the city was eligible to apply for Economic Development Administration (EDA) funds to supply the parking as an important element in the city plan, to provide job opportunities, and to enhance tourism.

National Tobacco and Textile Museum

The National Tobacco and Textile Museum, a nonprofit corporation, is in the old Virginia Tobacco Company building which was donated to the corporation in 1972. The museum's unique collection is threatened by a lack of climate control in the exhibit area, and the roof of the structure is in need of substantial repair.

The planning study recommended the retention of signs which were often painted on buildings.

As an interpretive center for Danville's tobacco and textile history, the museum could offer residents and visitors a primary understanding of the historical development of the city and the Tobacco District. The setting of the Riverfront Park, outlet center, other shops, and restaurants would complement an active museum and encourage day-long visitation in the area. The museum needs physical plant improvements to protect its collection, and the first priority is to repair the leaking roof and install an air conditioning system to provide continuous temperature and humidity control. The upper floors of the building are not used. This extra space could be used for commercial purposes and the income could help the museum become more self-sufficient.

Once the building has been physically stabilized, the museum could mobilize to take advantage of, and contribute to, the new commercial environment of the district. The rehab team pointed out that it is rare for a revitalized area to have a museum in its midst which explains its complete history, and the city should take full advantage of this opportunity.

Because of the diversity and complexity of funding sources for museums, the HAER team met with the museum board and the Overall Economic Development Program Committee and presented information on the various funding programs available. Museum-specific funding sources deal primarily with museum programs and staff development. The committee was advised that aid for physical improvements would probably be most successful either from an Urban Development Action Grant through the Department of Housing and Urban Development or as a grant from EDA as part of the plan to develop parking and city services.

Southern Railway Yard

The Southern Railway yard provides a direct link from Craghead Street to the river. It contains approximately 15 acres of open space and several significant structures, including the passenger station, an office building, a freight depot, a head house, an old gasworks, and a building which once housed a bottling company. In the context of the district, the railroad yard occupies one corner and, properly developed, would securely bolster this end of the district.

At the time of the rehab team visit, the *Southern Crescent* passenger train had been given a one-year extension by the Interstate Commerce Commission. If the passenger service stops, the station could be available for reuse. If the passenger service continues and is integrated into the Amtrak program, there will be opportunities for a mixed-use of the train station including passenger rail service and commercial uses such as a restaurant or shops. The freight depot, with its row of arched openings, is suitable for small shops, each with its own outside access.

HAER contacted the Southern Railway concerning future plans for the rail yard, and they appeared to be interested in finding new uses for the buildings as they become available. By this time other portions of the Tobacco District action plan will have been implemented. The district's needs will have been assessed, a plan developed, and private investors/developers informed and encouraged.

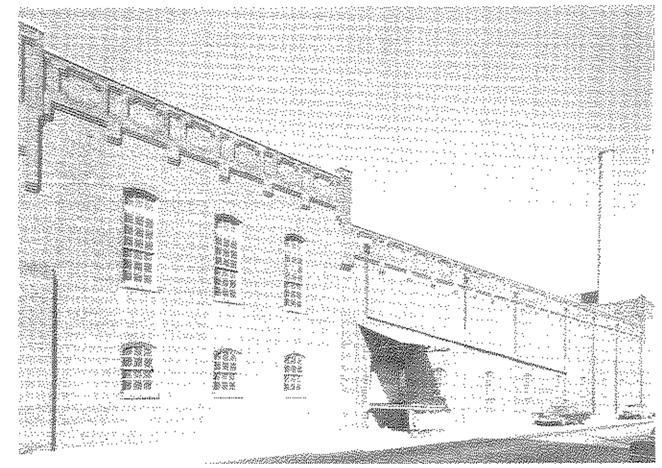
Housing

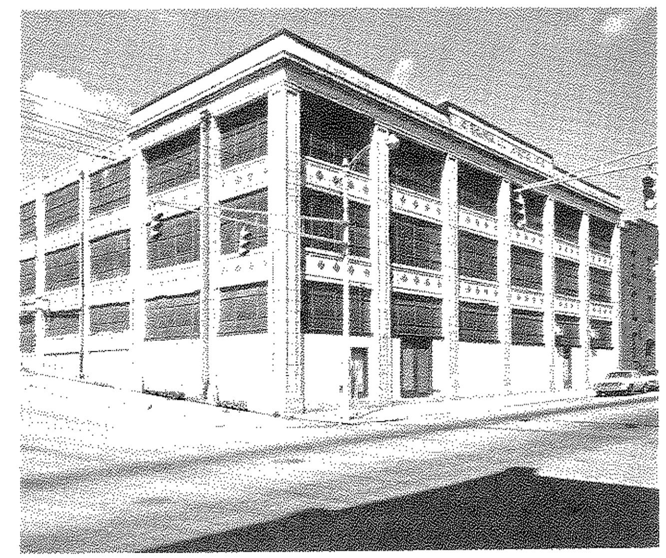
Clearly, any redefinition of the Tobacco District as an integral part of the city would need to consider housing provisions. Housing, a fragile commodity which must be very carefully planned, would increase the viability of the district as a complete living and working environment by providing a sense of stability, security, and continuity to the district's commercial ventures.

Since a desirable setting for the housing component would first have to be created, implementation of this component would occur only after the Riverfront Park, improved public services, and commercial revitalization had provided such a setting.

A variety of structures in the district were architecturally suitable and appropriately located for rehabilitation into residences, and the HAER planners projected a steady demand for housing in Danville for the next 5 years.

Along with commercial development of the industrial structures, the HAER team addressed the adjacent neighborhood. The problem of displacement must be a justifiable concern of preservationists. In many cases, the revitalization of a neighborhood has put the price of living out of reach for people who have lived there for years. Gentrification of a neighborhood has come about because reinvestment in an area, with subsequent high construction costs and real estate speculation, has made a rehabilitated house expensive. The key to HAER's neighborhood plan was to offer the opportunity of home ownership of a rehabilitated structure to those who had rented for years, thus keeping the social fabric of the neighborhood intact. Several city agencies and private lending institutions were part of a process of administrating, counseling, and financing such a program in Danville. The initial phase of this project has been funded by the U.S. Community Services Administration through the Community Improvement Council.





Top, *the 173,000 square foot Imperial Tobacco Building could be used as a retail outlet facility with space for 46 stores.* Bottom, *the Crowell Motor Company building across from the Imperial Tobacco Building could provide 250 parking spaces.*

The project outlined by the HAER team did not launch long-term subsidies; rather it was a one-time shot in the arm to spring home ownership opportunity in rehabilitated houses for not much more cost to the occupant than the rent. The rehabilitation of the neighborhood also included the necessary public improvements to streets, landscaping, and local recreation facilities.

This revitalization plan was long-range and did not incorporate new uses for every structure in the study area. The plan encouraged the continued use of structures and suggested new or alternative uses only where the structure was underused or where the reuse might spark revitalization. Long-term redevelopment should be planned to build on itself in a logical manner while enhancing the historic and architectural features which give the area a character and identity of its own. Many cities have chosen expedient or faddish solutions to systematic problems and have been left with dated results. This proposed revitalization plan was conservative and flexible, and was based on tested economic, social, and structural data. It did not attempt to answer definitively all questions that will arise as the plan develops, but will provide the sources for an informed analysis and decision at the appropriate time.

The HAER team discovered a very fortunate city when it arrived in Danville. Like many other American cities, Danville's historic resources had not been destroyed—merely overlooked during years of expansion.
Urban recreation facilities were limited but multiple possibilities existed. Important residential social patterns were unrecognized but could provide the bonds to create a vital neighborhood. Citizen appreciation for the Tobacco District was minimal but could soon become the source for a fierce pride in the history and accomplishments represented by that built environment.

Since August 1978, when the rehab team visited, the city has sent the historic district nomination to the state historic preservation office. Danville also hired a professional planner with extensive experience in private development to undertake the considerable task of implementing the plan for the Tobacco District and neighborhood and to coordinate the rehabilitation of a historic industrial district.

What the team members found when they arrived was a possibility. Before leaving, they had highlighted the important connections between planning and history, preservation and recreation, and possibilities and realities. Danville and other American cities can profit from their built environments by tying past to present, making each American community a unique and special place to live and work.

James Vaseff is a rehabilitation architect with HAER and was supervisor of the Danville project. Timothy King was an intern with HAER while a student at Antioch College in Ohio. The published plan, *Rehabilitation: Danville 1978, A Strategy for Building Re-Use and Neighborhood Conservation,* can be obtained from the U.S. Government Printing Office (Stock #024-016-00108; $3.75). For further information contact James Vaseff, Rehabilitation Architect, HAER/HCRS, 440 G Street, N.W., Washington, D.C. 20243.

The Future of Rental Housing

W. Paul O'Mara

"The two main causes of the rental housing shortage are inflation and poverty," concluded Anthony Downs of The Brookings Institution at a recent symposium on the future of rental housing in Washington, D.C. "Only policies that eliminate or fully counteract these causes can end that shortage."

The symposium, which was sponsored by ULI, provided experts who have a national perspective on rental housing issues a chance to contemplate the long-term implications of the current rental housing situation. The discussion, which was chaired by ULI Residential Council member James Klingbeil, dealt with the full spectrum of rental housing types, both market rate and subsidized.

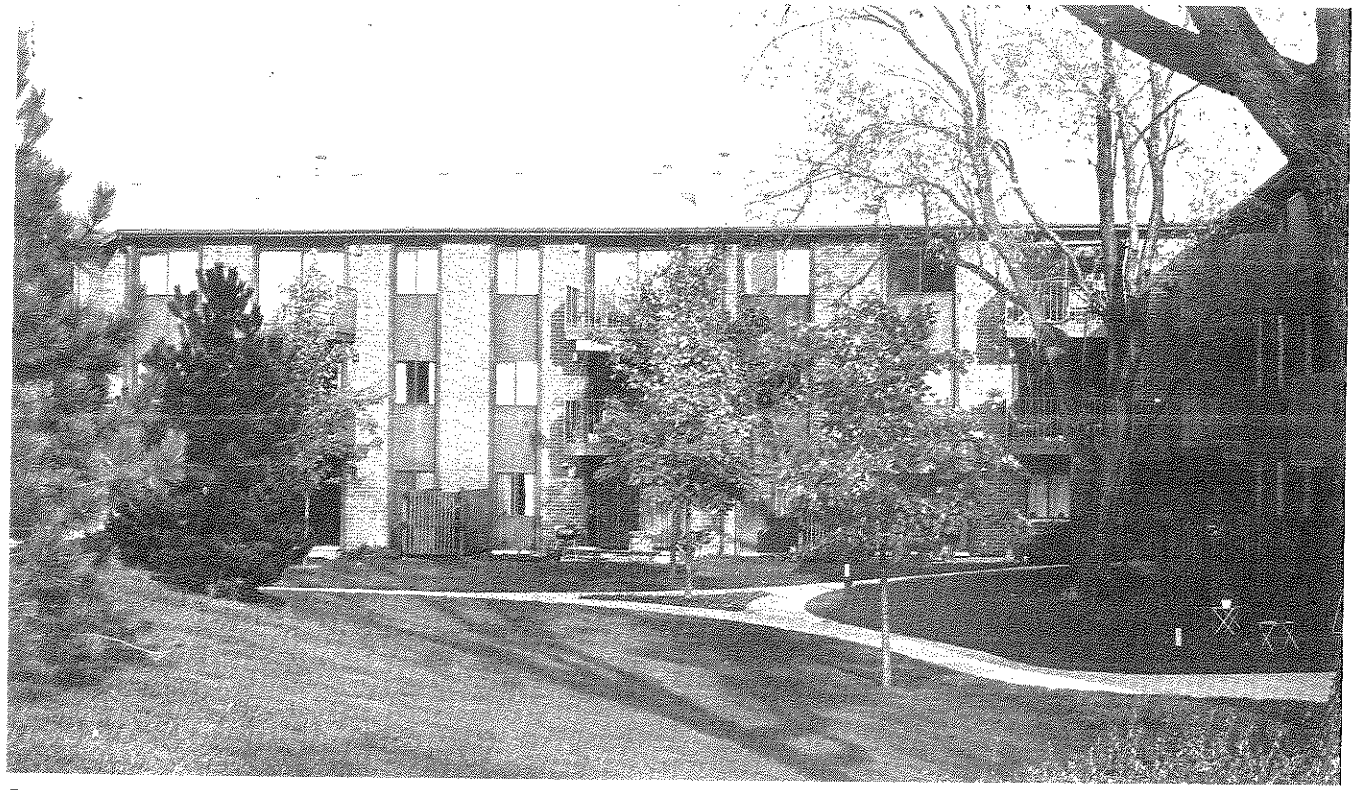
While the production of rental housing continues to increase at a moderate rate nationwide, a series of issues have been raised which create general doubts about the future viability of the market for rental housing. Therefore, the symposium addressed two basic questions:

- Will rental housing in its present form survive as a housing type over the long term? And if so, what segment of the population will it serve?
- If rental housing is predicted not to survive in its present form, what type of housing will evolve to take its place?

Downs began the discussion by stating that despite rumors to the contrary rental housing is not going to disappear. Rental housing units comprise over one-third of all existing U.S. housing—or 26 million units. (Twenty-four million are privately owned.) Consequently, they will remain a key part of our housing markets for decades. "However," says Downs, "inflation and other factors are now creating a 'double squeeze' in rental markets, causing rents to rise faster than the incomes of most tenants, but more slowly than the costs of operation or new construction." This will continue to inhibit the building of new rental units, which already has fallen sharply since the early 1970s.

Moreover, a high fraction of rental housing is occupied by the poor; 30 percent of all renters had annual incomes less than $5,000. "In 1976," Downs said, "the median annual income among renter households was $8,100, or only 56 percent of the $14,400 median among those who own their own homes." Over time the capacity of renters to pay higher amounts for rent has not risen as much as the capacity of homeowners to pay higher amounts for ownership.

Other factors discouraging the creation of new rental housing include a fear of rent control, a likely demographic switch away from renter-oriented households in the 1980s, and the tendency of small-scale landlords to keep rents below the market-clearing price. Sixty percent of all rental housing is in buildings with four units or less, and these are typically owned by small-scale entrepreneurs who have an approach of minimizing tenant turnover rather than maximizing rent. A vacancy can be devastating if one owns just a few units. In addition, many rental units are being converted to condominium ownership; many builders and investors themselves have been turning to for-sale housing because of the high cost of managing rental housing. In fact, James Klingbeil felt that people are buying property at an earlier age because of the investment opportunities rather than to satisfy a genuine need for housing. The rapidly rising prices of owner-occupied housing have made ownership extremely attractive. Owning a home is a hedge against inflation, has significant tax advantages, and provides security. Consequently, Klingbeil feels that with people buying houses earlier than the traditional age of 30, there is probably one more house purchase during the life of an average homebuyer and that this is having a significant effect on the rental housing market. Sanford Goodkin echoed this same thought by indicating that through the media consumers are imbued with the idea that if they don't get a "piece of the action," i.e., a house, they are perceived as failures.



Rental apartments at Parkview Hills, Kalamazoo, Michigan.

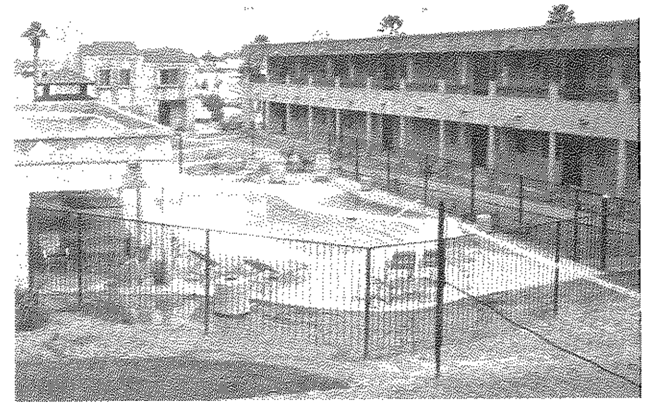
To be sure, the need for additional rental housing units will rise significantly in the 1980s and beyond because of general population growth and the increasing requirement for the replacement of existing rental units. Just how many units are needed in the future? The answer lies in how quickly one wants to replace the existing stock, because the combination of continued low-level production of new rental units—over 400,000 per year after 1977—coupled with an expanding need for them is already producing a serious shortage in rental housing that is almost certain to get worse in the 1980s.

According to Downs, this low production level will generate the following conditions:

- faster increases in rents than in the past;
- reduced replacement of older units, accompanied by overcrowding and a greater deterioration of the existing inventory;
- the spread of rent control to larger cities;
- expansion of condominium conversion;
- expenditure of a higher fraction of income on housing by most American households;
- more local government ordinances restricting the rights of property owners;
- more widespread use of "pass-through" leases whereby the cost of inflation is shifted from property owners to tenants; and
- increased abandonment by landlords in very poor urban neighborhoods.

William Caldwell indicated that the reason rental housing projects are not being built is that the "numbers don't work." Rents are not high enough to offset the construction and maintenance costs. In some cases, said Caldwell, developers were building rental units with the idea of taking a loss on them for the first few years and eventually converting them to ownership forms. Despite this gloomy statement Caldwell stated that rental housing is working in some selected areas:

- where units are small, typically 450 to 550 square feet for a one-bedroom apartment;
- where there are add-ons to existing projects;
- where units are luxury, high-rise and rents are not a concern; and
- where deals involve syndication either through limited partnerships or joint ventures. The limited partners are typically looking for tax shelter benefits.

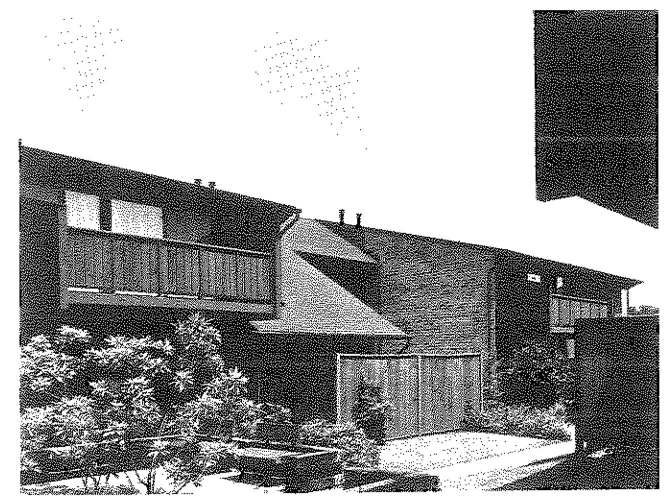


Sunpointe Apartments, a 164-unit rental complex 3 miles north of downtown Tucson, Arizona. To enjoy amenities at reasonable rents, the tenants are willing to give up some square footage in the apartments. Studio apartments are 327 square feet; one bedroom units are 418 square feet.

Regarding the feasibility of rental housing, Laurence Simons, Assistant Secretary for Housing and Federal Housing Commissioner, felt that the government should intervene in the rental housing market to stimulate it. "Either rents are high enough or the market is subsidized to make it work," he said, "It's an affordability problem not a housing problem." Housing subsidies are needed for the very low income population. There is no way, added Simons, for many to ever move up and be able to pay a market rent. Therefore the federal government will not get rid of its Section 8 housing program. Also, there could be a varying housing subsidy program based on the cost of production in local markets and incomes in those markets.

Simons also indicated that HUD is not interested in a federal law on condominium conversion or rent control. They are local problems. "The answer to condo conversion and rent control is supply," he said.

A number of major lenders have withdrawn from the rental market or have scaled back mortgage allotments because as Thomas Montgomery, vice president of Travelers Insurance Company, put it, "a mortgage is a lousy investment in an inflationary time." Some lenders are more interested in equity participation than mortgage lending. As a result the symposium participants agreed that there seems to be less money for conventional rental housing.



Top, *Walpole Point, a 252-unit community on a redevelopment site in Chicago, was completed in 1973. It consists of 172 rental townhouses and 80 individually owned townhouses.* Bottom, *London Square, a 225-unit, semi-luxury, rental, garden apartment complex in suburban Canton, Ohio.*

Future of Rental Housing Symposium Participants

James D. Klingbeil Chairman	President The Klingbeil Management Group Company	Sanford R. Goodkin	Sanford Goodkin Research
J. Thomas Black	Associate Director of Research The Urban Land Institute	Morton Isler	Director of Housing Urban Institute
Allan Borut	Associate Director of Research The Urban Land Institute	Irving Kriegsfeld	President Management Partnerships, Inc.
M. Jay Brodie	Commissioner Baltimore Department of Housing and Community Development	Martin Levine	Analyst Congressional Budget Office
Preston Butcher	President Lincoln Properties Company	Thomas Montgomery	Vice President Travelers Insurance Company
William F. Caldwell	President Caldwell Equity Corporation	W. Paul O'Mara	Associate Director of Publications The Urban Land Institute
Robert Cleveland	National Housing Management Service	Donald E. Priest	Director of Research The Urban Land Institute
Carla Crane	Program Division Director The Urban Land Institute	Ronald R. Rumbaugh	Executive Vice President The Urban Land Institute
Barry Dean	Director of Multifamily Department National Association of Home Builders	Donna E. Shalala	Assistant Secretary for Policy Development and Research U.S. Department of Housing and Urban Development
George DeFranceaux	Chairman National Corporation for Housing Partnerships	Laurence B. Simons	Assistant Secretary for Housing Federal Housing Commissioner U.S. Department of Housing and Urban Development
Anthony Downs	Senior Fellow Brookings Institution	David E. Stahl	Executive Vice President National Association of Home Builders
Richard Francis	Executive Vice President National Rental Housing Council	Bruce Steele	Chief, Housing Programs Metropolitan Washington Council of Governments

Nevertheless, some builders are doing an adequate job of meeting rental housing demand but only in selected markets. Places such as Houston and Dallas and areas of the Sun Belt continue to experience significant rental activity. In these areas construction costs, fuel costs, and wages are lower than the national average, and developers can build garden, rather than high-rise, apartments.

What can be done to ease the shortage? Nothing says Anthony Downs unless rampant inflation is curbed. "Inflation is the key villain in the rental market and the hero in the ownership area." Others suggested that renters who choose to rent should no longer be penalized by the system. They should qualify for tax deductions for those portions of their rental income going for mortgage interest and property taxes. Perhaps localities could institute policies to expand the rental housing stock rather than depleting it through rent control. Incentives such as tax abatement could be tried. Montgomery suggested that ways should be found to encourage people to save rather than to borrow. There need to be tax advantages for savers. Right now people build savings through home equity. Participants were unanimous, however, on the undesirability of rent control. Rent control was deemed a political expedient and not an answer to the rental housing problem.

In the end, if inflation continues over the long run, conventional multifamily rental housing will gradually diminish in spite of all that is done for it. However, although it will take many years for it to disappear totally, there is still cause for alarm today.

W. Paul O'Mara is associate director of publications and editor of *Urban Land.*

Curbing Uncertainties in the Development Approval Process

Annette Kolis

In the past decade, the number and variety of approvals required for development has increased dramatically. Many new approvals require massive information documents, are issued under flexible or discretionary criteria, or provide new points for citizen appeal. An approval process which 10 years ago may have been completed in 2 months may now span 2 years—2 years of expensive processing, litigation, and holding costs during which approvals may be modified or retracted. Uncertainty and risk has substantially increased: the developer is often uncertain whether, when, and how approvals may be obtained and maintained.

With the shift toward larger scale developments in which up-front expenditures can be significant, the risk in the approval process often has an impact on project viability. Due to the expense and delay of many governmental processes, many project proposals for low- or moderate-income housing are finally approved as luxury single-family units. This may occur for two reasons: the developer changes the proposal in order to gain a return which will cover the expense of the approval process; or, the developer is forced through bureaucratic delay to build politically acceptable single-family units. Even when low- or moderate-income units are approved, excess costs of the approval process will be passed to the consumer if the market will bear the excess cost.

There has been increasing recognition that uncertainty in the development approval process is a contributing factor to the escalating price of housing. The extent to which uncertainty and risk have an impact on housing cost is still subject to debate, but a consensus appears at least to have been reached on the fact that unnecessary risk for the developer unnecessarily raises the cost of housing for the consumer. Defining and eliminating unnecessary risk should be a matter of concern to both developers and government regulatory agencies.

The uncertainty issue can be stated in the following terms: At what point in time and after which governmental assurances will a developer have the right to complete a project without altering the project scope or design? Uncertainty in the development approval process is the result of two basic types of change which occur after development approval—legislative and administrative—and can be illustrated by the following examples:

Change by the Legislative Body

1. Rezonings or zoning amendments, changes in requirements or standards, or new comprehensive legislation and plans (for example, mandatory planning acts);
2. New legislation which adds restrictions to development in specified areas (e.g., coastal zones, pinelands, floodplains);
3. Interim moratoria on building or other permit issuance (based on environmental or rapid growth justifications) pending study and new regulation.

Change by the Agency with Power to Approve the Development Proposal

1. Reversal of formal or informal approval of project proposal;
2. Late demand or change in demand of the type and scope of exactions required as a condition to obtaining development approval;
3. Late enforcement of restrictive regulation which was previously deemed inapplicable to the project in question (e.g., early informal agency assurance that an environmental impact statement (EIS) need not be prepared but later reversal of opinion to require preparation of a full EIS which may include extensive mitigation requirements).

The justification for allowing change after approval is granted is that governmental agencies must be free to protect the public welfare when required by changing economic, environmental, and social conditions. The law does, however, recognize certain situations in which a developer should be protected from change. A developer's right to complete a project despite legislative or administrative change depends upon the developer's status under one of two umbrellas of protection: constitutional/common law or statutes.

The first theory of protection, constitutional/common law, is described by various terms: vested rights, estoppel, and zoning estoppel. Protection is given by the courts on a case-by-case basis depending upon the good faith of public and private parties involved and the amount of work the developer has completed in reliance upon valid governmental approval. No uniform doctrine exists. State courts differ in their interpretation of factors which lead to the basic conclusion that fairness dictates either that the project be halted for the public health, safety, or welfare, or that the developer should be permitted to continue or complete construction. Norman Williams in his book, *American Land Planning Law*, describes this uncertainty: "The courts tend to react to each case according to their view of the equities, which depends on a subtle interpretation of the facts in light of the particular judge's scheme of social values." Although a successful litigant will be completely protected, there is rarely a guarantee of the outcome of judicial analysis. Moreover, the expense and delay necessarily encountered in seeking a remedy through litigation serve to make protection under constitutional/common law a dubious solution. For these reasons, a more satisfactory answer to the problem may be statutory protection.

Options for legislative protection are numerous and varied and should be tailored to the regulatory requirements and atmosphere of each enacting jurisdiction. Some options for statutory protection from change are:

1. Savings or grandfather clauses in newly enacted legislation or local ordinances which restrict development opportunities. Savings or grandfather clauses grant developers with a specified level of government approval the right to complete a project as proposed.
2. State adoption of (or state legislation which mandates local governments to establish):
   a. limits on where and when exactions may be required in subdivision or discretionary approval (e.g., PUDs) processes;
   b. the points in the development approval process at which the developer has a right to rely on a granted permit and/or at which the developer has the right to complete the project;
3. State legislation which authorizes local governments to enter into binding agreements with developers.

The first option, savings clauses, appears to be a rational solution to the potential inequities of legislation which adds substantial restrictions to development opportunities. Unless the new restrictive legislation is unconditionally necessary to avert dangers to public health and safety, granting rights to continue or complete development to those developers who have acquired a specified level of governmental approval is an appropriate accommodation of public and private interests. The specified level of governmental approval under which a developer acquires rights to continue is defined in the statute by the legislature. In order to avoid excessive recourse to the courts, power to determine each developer's status under the savings clause can be delegated to a local entity.

The city of San Antonio uses this approach in the "Interim Development Ordinance for the Aquifer Recharge Zone and Drainage Area" (Ordinance#484848 (1977)). The ordinance establishes an interim moratoria for developments providing less than 5 acres per dwelling unit in the Edwards Underground Aquifer area until a comprehensive planning process is completed. The policy of the ordinance is to allow completion of projects when the applicant demonstrates to the city council (which is empowered to make vested rights determinations) that he has vested rights. In order to do so he must demonstrate that he has in good faith detrimentally relied upon an act of the city of San Antonio, and that it would be inequitable of the city not to allow him to proceed. The city council must make a decision in 15 days.

In this ordinance, the standard for approving a vested right—the equities of the case at hand—is as vague as most judicial rules. Yet under the ordinance it is possible for the applicant to obtain relief more quickly and less expensively through appeal to the city council rather than having to resort to the courts for time- and cost-consuming litigation. This aspect is also positive from the perspective of the local government: time and money are saved in avoiding litigation.

The second statutory option, establishment of limits on when or where exactions may be required and what point in time approvals may no longer be retracted, is a broad and complex category and is considered briefly here. Examples of this statutory option include subdivision ordinances which limit imposition of land dedication requirements to the initial platting stage and to land within a specified distance of the proposed development. This type of provision is relatively simple to design and provides the developer assurance of what may be required as a condition to approval. Statutory establishment of the point in time after which approval may not be retracted may be more difficult to design. The difficulty exists because the balance between public welfare and legitimate developer reliance may be different for different developments. To statutorily define a point in time after which approval may not be retracted, without allowing consideration of the good faith of the participants or the consequences of the development going forward as planned, may prove contrary to the public welfare. On the other hand, to fail statutorily to define a certain point in time after which approval may not be retracted is to add little to whatever certainty the developer enjoys without statutory protection. In addition, some courts may view statutory establishment of a vested right to be an extinguishment of rights under constitutional/common law doctrines, an interpretation which may not prove equitable in every situation.

An example of the third statutory option, binding local government/developer agreements, can be illustrated by a California state statute. Assembly Bill No. 853 (Chapter 934, to become effective January 1, 1980), entitled "Development Agreements," provides:

> 65865. Any city, county, or city and county may enter into a development agreement with any person having a legal or equitable interest in real property . . .
>
> 65865.2 A development agreement shall specify the duration of the agreement, the permitted uses of the property, the density or intensity of use, the maximum height and size of proposed buildings, and provisions for reservation or dedication of land for public purposes. . .
>
> 65865.4 [A] development agreement shall be enforceable by any party thereto notwithstanding any change in any applicable general or specific plan, zoning, subdivision, or building regulation adopted . . .
>
> 65867.5 A development agreement is a legislative act which shall be approved by ordinance and is subject to referendum.

Additionally, Section 65869 of the act provides that development agreements may not be negotiated for development in coastal areas unless the local coastal program has been certified or the California Coastal Commission approves the agreement. Finally, Section 65869.5 provides that state and federal laws or regulations enacted after the effective date of an agreement will modify or suspend conflicting agreement provisions.

The exemption of uncertified coastal areas from the act's purview limits the impact of the statutory protection. Although the provision may provide an incentive to developers in coastal areas to support the adoption of certified local programs, adoption of a certified program is no assurance local governments will later enter into development agreements. This is due to the fact that local governments are authorized to enter into binding agreements, not mandated to do so. Local governments in all areas may be unwilling to use this authorization since powers to require later dedications or changes will be limited after agreement. If developers do negotiate a development agreement, state and federal regulation may alter or terminate agreement provisions. A strong local police power justification may also allow government modification or termination of the agreement under the theory that the police power cannot by contract be limited or extinguished. In the event, however, that agreements under the statute are entered into and are deemed to bind local governments, developers should benefit substantially as they will be protected from change under the terms of the agreement. Good faith compliance on the part of both public and private sectors should prevent having to resort to the courts for dispute resolution.

This is perhaps the most important point to be made. Informal protections may in the end be most effective: good faith compliance with regulations on the part of developers, coupled with good faith compliance on the part of public officials. Public officials who understand the development process realize that midstream change in discretionary conditions and approvals may significantly, and unnecessarily, impact the cost of the ultimate housing products for their constituents. Public officials should therefore retract or significantly alter governmental approvals only in the event that the proposed development poses a threat to the public health, safety, or welfare. In an atmosphere of mutual understanding of private and public sector concerns and impacts, and competent compliance with legal requirements, certainty can informally be realized in the development approval process.

Statutory protection from change in the development approval process is not a new phenomenon, but there is an impetus toward more certain, more pervasive statutory provision of protection. No one solution is possible, and the impact of some statutory solutions may be positive. As in other areas of regulation, it will take time before statutory reform reaches the best possible accommodation of public and private interests.

Annette Kolis is ULI's Assistant Research Counsel.

Brambilla, Roberto and Gianni Longo
LEARNING FROM SEATTLE
Institute for Environmental Action, 81 Leonard Street, New York, NY 10013
1979. 119 pp. Illustrated. A one-year subscription for $24.00 to the quarterly *Learning from the USA* includes this book, plus forthcoming issues on Baltimore, Atlanta, Denver, and Minneapolis.

The first book in a *Learning From . . .* series sponsored by Partners for Livable Places and the Institute for Environmental Action. "It highlights the improvements that have been achieved, the context within which these changes took place and the processes that achieved them. . . . Why Seattle? Seattle has been particularly successful in initiating and implementing innovative projects. Seattle citizens have shown that they care enough about their city to do something special about making it better. And because in Seattle, many of the solutions to urban problems have had an impact, citywide, far greater than the amount of money and effort they took to achieve." This book is addressed to an audience of urban advocates—government, business, and community—whose concern is with more livable cities.

The introductory chapter provides an overview of "what makes Seattle livable," while a final section summarizes 10 principal reasons for the city's livability: its waterways, neighborhood activism, a vital downtown, Seattle Center (the exhibition area for the 1962 World's Fair), renovation of Pioneer Square, restoration of the Pike Place farmers' market, renovation of the central waterfront, a free downtown bus service, conversion of a section of a freeway into an imaginative Freeway Park, and the recycling of an abandoned gasworks into a public park. A second chapter deals with Seattle's history. The rest of the book details how Seattle went about creating or saving the amenities which make it so "livable." "Some of the factors which make a livable city are purely accidental, while others are the result of thoughtful planning, design, and management of urban resources. Accidental factors are unique to each city, but the result of planning and development can be used as tools by other cities as well, as long as the political, cultural, and environmental context in which these programs were introduced are clearly understood." It is the purpose of the *Learning From . . .* series to provide practical information on these tools for solving certain urban problems.

FORUM III: HOUSING FOR THE RETIRED
Federal National Mortgage Association, 3900 Wisconsin Ave. NW, Washington D.C. 20016
1979. 48 pp. Illustrated, tables. $3.50

Fannie Mae (Federal National Mortgage Association), the world's largest mortgage investor, invited 120 middle-income retirees to participate in a symposium on housing for the retired. The results of this symposium are presented in this report, which demonstrates that "there is a market for retirement housing, which deserves and invites greater attention and involvement on the part of industry and government." Symposium participants as well as 1,158 questionnaires returned by middle-income retirees across the country provided a great deal of information on the housing needs, preferences, and concerns of retirees, and about such specific desirable housing features as design, location, attendant services, and financing. Three of the findings documented by the retiree survey "deserve repeating. First, there is a significant housing market made up of middle-income retirees and it is growing at a fast pace. Secondly, retired Americans do have very real preferences and desires concerning their retirement home and, within obvious cost limitations, retirees want their preferences incorporated into their home. And finally, the type of home that retirees prefer and can afford is not currently being built in any significant quantity." Details on the housing preferences of the over-55 segment of the population are given in this report. Much of the data is broken down by such characteristics as age and income. Some of the subjects covered in detail are:

- type of housing structure and number of rooms
- location of housing
- design of kitchen, bathroom, and other elements
- factors which influence a change of residence
- economic factors affecting retirement housing choices—inflation, the availability of suitable housing, mortgage money, etc.
- neighborhood services which are more important than others. The report also includes plans for an "options house," with a variety of possible arrangements all developed from a 24′ by 24′ base plan. It was designed by an architect commissioned by Fannie Mae and based on the ideas and preferences expressed by the survey respondents and symposium participants. Forum III participants established a set of guidelines that can assist the building industry and others in designing and building a range of retirement dwellings."

Godschalk, David R. and others
CONSTITUTIONAL ISSUES OF GROWTH MANAGEMENT, Revised Edition
Planners Press, American Planning Association, 1313 East 60th St., Chicago IL 60637
1979. 476 pp. Bibliography, glossary. $18.95 ($16.95 to APA members)

The authors of this revised edition argue that there are basic constitutional principles on which responsible growth management programs should be based, and if they are so based they will outlive programs that merely reflect current trends. "We believe that local growth management can make a socially valuable contribution. To do so, however, its designers must be keenly aware of who benefits and who pays. Without that awareness, local growth management may indeed become the villain that its detractors make it out to be."

Growth management programs should be more than merely legally defensible. Besides considering the traditional concerns of growth policies, that is, the protection of private property, the neighbor, and the local resident, a responsible approach to growth management encompasses "broadened-impact planning." This requires weighing "distributive outcomes, civil rights, and environmental quality in an attempt to balance fairly the impacts of the government's actions on all affected parties," including the regional resident and the potential resident.

Constitutional Issues of Growth Management is divided into 6 parts:

- An analysis of the concept of growth management. This reviews the population shifts that have created local growth pressures, identifies the controversies that have arisen over local growth management efforts, and provides a simple model of growth management dynamics.
- A discussion of potential constitutional challenges. These challenges are rooted in due process, the taking issue, regional welfare, equal protection, the right to travel, and environmental protection standards. For each of these issues the legal base, the circumstances that might provoke a challenge, judicial standards, and possible judicial relief are explained. For certain issues, examples of litigation are provided.
- A series of illustrative, hypothetical cases, based on four sets of growth problems faced by many localities: (1) managing urban fringe development; (2) coordinating suburban development; (3) planning for carrying capacity; and (4) guiding regional growth.
- An analysis of the design of local growth management policies in terms of constitutional issues. "Our assumption is that incorporating constitutional protections into local growth management policies is desirable for two reasons. First, it makes it more probable that the locality will be able to avoid litigation or, in the event of a challenge, that it will be able to defend its policies in court. Second, and even more important, it builds into the policies a sense of public awareness of and responsibility for the impacts of the policies on the rights of those affected by them. Policies grounded in constitutional principles should be both legally defensible and socially responsible."
- Twelve case studies of growth management programs, focusing on those elements which are important or controversial from a constitutional point of view. The cases presented are Ramapo, New York; Petaluma, California; Boulder, Colorado; Boca Raton, Florida; Sanibel, Florida; Bucks County, Pennsylvania; Montgomery County, Maryland; Fairfax County, Virginia; Mount Laurel, New Jersey; Madison Township, New Jersey; Metropolitan Washington (DC) Council of Governments, and Metropolitan Council of Minneapolis-St. Paul, Minnesota.
- Supplemental materials, including a bibliography and an analysis of an exploratory survey of 300 growth management locales—the content, context, tools, and techniques of their growth management programs.

LAND & FOOD. THE PRESERVATION OF U.S. FARMLAND (American Land Forum Report No.1)
American Land Forum, 1025 Vermont Ave., NW, Washington, D.C. 20005
1979. 64 pp. Illustrated, bibliography. $6.00

A report based on an American Land Forum "farmland forum" and post-forum follow-up analysis. Local approaches to farmland preservation were raising more questions than they were providing answers. Therefore, the forum was organized to grapple with such questions as "What is working and what isn't? Are new approaches needed to break the logjam? To be sure, the loss of farmland is thought by many to be a national issue, but there is less agreement that this inevitably requires the federal government to play an active role in its retention—especially if the role costs money and smacks of intervention in 'land use.' Is there a federal role, and if so, what is it?" *Land & Food* covers a number of topics, including:

- The Cropland Squeeze—increasing urban conversion of prime farmland and decreasing rates of growth in yield per acre.
- Buckshot Urbanization—the isolation of cropland by zig-zag urban growth and the lack of a national policy addressing the need for a national capacity to meet long-run increases in demand.
- Yields and Land—reasons for caution about our ability to "intensify" agricultural production at will, including climate, land degradation,

air pollution, and the energy and materials supply situation. Land is likely to "be an increasingly important factor in the production equation."

- The Politics of Preservation—Thorny issues are raised concerning who should do what to protect farmland.
- Farmland Action: Is It Enough?—"If there is to be a permanent remedy to the farmland issue, it will surely require coordinated action by all levels of government in cooperation with land owners and others with an economic stake in U.S. agriculture."
- Farmland and the Future: The Policy Challenge—"The farmland issue is a curiosity. The decision the nation makes about the resource base is actually being made now, at a time when the crucial importance of the resource is practically invisible to the average citizen. The trouble is when the problem does 'go critical' it may well be beyond remedy—at least of the kind under consideration today."

A "sources and resources" section of the report contains legislative and other background materials—the "Jeffords Bill" to protect agricultural land, an October 1978 U.S. Department of Agriculture Statement on Land Use Policy, the Environmental Protection Agency's September 1978 Policy on Agricultural Lands, an August 1976 Council on Environmental Quality memorandum on farmland, a selected bibliography, and a listing of organizations and agencies involved with aspects of the farmland issue.

Schwartz, Seymour I. and others
THE EFFECT OF GROWTH MANAGEMENT ON NEW HOUSING PRICES: PETALUMA, CALIFORNIA (Environmental Quality Series No. 32)
University of California, Davis, Institute of Government Affairs, Davis, CA 95616
1979. 72 pp. Tables, bibliography. $3.50.

Describes an empirical investigation of the effects on housing prices of a restrictive growth control program adopted in 1972 in Petaluma, California. Petaluma's Residential Development Control System (RDCS) is a permit allocation program designed to limit the number of new units per year as well as to control their location, type, quality, and price. Price changes between 1969 and 1976 for new single-family houses in Petaluma were compared with those of two nearby communities—Santa Rosa and Rohnert Park. It was concluded that, in terms of today's housing prices, the increases in price in Petaluma which are possibly attributable to growth control are, depending on the house size, between $4,000 and $7,000.

Two types of price change comparisons are made. First, comparisons are made between "standard houses," that is, houses with similar characteristics in terms of size, lot area, the number of built-in appliances, the number of fireplaces, an index of quality, and an index of condition. Then, since price changes also result from changes in the characteristics of the houses actually built, the characteristics of the houses compared are allowed to differ between the cities and over time, resulting in a price change comparison for actual houses.

In constant 1970 dollars, the average sales price increase over the period was 31 percent for Petaluma, 22 percent for Rohnert Park, and 3 percent for Santa Rosa. Average floor area for the post-RDCS period was 17 percent larger in Petaluma and 23 percent larger in Rohnert Park than before growth control. The average floor area of Santa Rose houses remained virtually unchanged. Post-growth control average lot sizes increased 15 percent in Petaluma and 16 percent in Rohnert Park and decreased 3.3 percent in Santa Rosa.

For small, medium, and large "standard houses," Petaluma price increases were greater than those in Santa Rosa by between 6.9 percent and 8.1 percent of the before-RDCS value of standard houses. The pattern of standard house price increases in Petaluma compared to Rohnert Park was mixed—some higher, some lower—and not statistically significant.

The price change differences for the three cities between the two time periods was much greater for actual houses constructed. The prices of average small houses in Petaluma increased between 17.7 percent and 24.5 percent more than in Santa Rosa; for medium houses the difference was between 14.2 percent and 20.3 percent more; and for large houses Petaluma's increase was 13.3 percent to 18.8 percent higher. Petaluma price increases were significantly larger than in Rohnert Park only for small houses on medium and small lots. For medium and large houses, Rohnert Park increases were higher than Petaluma's. The major factor in explaining these magnitudes of price changer is the increase in floor area in Petaluma relative to Santa Rosa and the increase in floor area in Rohnert Park relative to Petaluma. These floor area increases, however, are related to Petaluma's housing allocation process for both Petaluma and Rohnert Park.

The absence of significant differences between Petaluma and Rohnert Park is not evidence that there was no growth control effect. The housing markets of these two cities were found to be highly interdependent, so that growth control in Petaluma directly affected house sizes and prices in Rohnert Park. The researchers caution that market factors not related to growth control could be, at least partially, responsible for the results shown by the study. It would be helpful "to include more of the possible explanatory variables in the price equation, especially development fees and exactions, property taxes (at the individual house level), environmental quality, and accessibility. Research should also be extended to the existing housing stock and to multifamily units. Work now in progress to evaluate the growth management program of the city of Davis (California) is incorporating most of these refinements." This report contains a literature review of works on housing price determinants and on growth management justifications and impacts.

PUD: A Better Way for the Suburbs (1971)
½ Price: $3.00
Provides a basic understanding of planned unit development.

The Puerto Rico Plan: Environmental Protection Through Development Rights Transfer (1975)
½ Price: $3.00
A detailed description of the Puerto Rican study of the use of transfer of development rights.

Real Estate Financial Reporting (1972)
½ Price: $2.00
Defines and analyzes terms involved in describing real estate reporting practices.

Securing Open Space for Urban America: Conservation Easements (1959)
½ Price: $2.00
Describes all the major mechanisms available to encourage or obtain the preservation of open space in rural or urban areas.

Shopping Center Zoning (1973)
½ Price: $3.00
Focuses on the need for sound and rational zoning controls that induce well-designed and well-conceived shopping centers.

Site Value Taxation in Central Business District Redevelopment—Sydney, Australia (1972)
½ Price: $2.00
An analysis of the Australian site value tax system and its role in Sydney redevelopment since 1956. Discusses the merits and failings of the site value tax.

Townhouses and Condominiums: Residents' Likes and Dislikes (1973)
½ Price: $4.50
The most extensive survey ever made of resident response to townhouse and condominium living. The frank opinions of 1,800 residents in 49 projects—duplexes, fourplexes, rows, and clusters—to a searching, comprehensive 49-question opinion poll touch on various aspects of ownership, design, density, maintenance, and environmental factors.

ALSO AVAILABLE—ULI Panel Service Reports which set out in detail the findings, conclusions, and recommendations of a panel of experts analyzing specific land use problems.
½ Price: $2.50 apiece

Alexandria, Louisiana—
urban redevelopment (1975)

Bethlehem, Pennsylvania—
urban redevelopment (1976)

Cambridge Center—
urban redevelopment (1976)

Englewood, New Jersey—
urban redevelopment (1974)

Pottstown, Pennsylvania—
urban redevelopment (1976)

Order Form

Please send me the following ULI publications at the prices listed below (½ of regular price). NOTE: Due to low prices, all orders must be prepaid. Offer expires February 28, 1980. This form must be used for all ½ price orders.

Quantity	Title	Price
____	(A01) Air Rights & Highways	$2.00
____	(A04) Apartment Communities	$2.00
____	(D01) Density: Five Perspectives	$2.00
____	(D05) Dollars & Cents of Shopping Centers: 1972	$7.50
____	(D06) Dollars & Cents of Shopping Centers: 1975	$13.50
____	(F02) Federally Assisted New Communities	$2.00
____	(I01) Industrial Bibliography	$1.85
____	(L03) Lake Management Case Study—Westlake Village, California	$5.50
____	(L04) Land: Recreation & Leisure	$2.00
____	(L05) Large-Scale Development	$3.75
____	(M10) Mobile Home Parks: Parts I and II	$2.00
____	(N06) New Towns Planning & Development	$2.00
____	(N07) New Zoning Landmarks in PUD	$2.00
____	(N11) Optimizing Development Profits	$3.00
____	(P03) Parking Requirements for Shopping Centers	$2.00
____	(P04) The Permit Explosion	$3.75
____	(P17) PUD: A Better Way for the Suburbs	$3.00
____	(P19) The Puerto Rico Plan	$3.00
____	(R01) Real Estate Financial Reporting	$2.00
____	(S02) Securing Open Space	$2.00
____	(S07) Shopping Center Zoning	$3.00
____	(S09) Site Value Taxation	$2.00
____	(T02) Townhouses and Condominiums	$4.50
	Panel Reports	
____	(A03) Alexandria, Louisiana	$2.50
____	(B03) Bethlehem, Pennsylvania	$2.50
____	(C01) Cambridge Center	$2.50
____	(E04) Englewood, New Jersey	$2.50
____	(P09) Pottstown, Pennsylvania	$2.50
	Amount	$ ____
	Subtotal	$ ____
	D.C. residents add 5% sales tax	$ ____
	Non-U.S. residents add 10% for extra postage	$ ____
	All purchasers add $2 handling charge	$ 2.00
	Total Order	$ ____

☐ Ship priority mail (First Class or UPS) and *bill me for additional postage.* Regular delivery takes 4-6 weeks.
☐ Send me a publications catalog

ULI member identification number ____________________

Name ____________________ Phone no. ____________

Street ____________________

City, State, Zip ____________________

Business or Profession ____________________

☐ Payment Enclosed ☐ Charge to the following credit card:

____________________/Exp. Date ____________
Master Charge or VISA Acct. No.

Signature ____________________

Return to:
Publications Orders, the Urban Land Institute
1200 18th Street, N.W., Washington, D.C. 20036

Make check payable to ULI–the Urban Land Institute

1979 INDEX