

Filling It In to Fill Up Jobs: How  
Employer Assisted Housing  
Programs and Community  
Development Corporations Can  
Partner to Create Sustainable  
Community Growth through Infill  
Development

## Why Do We Need New Approaches to Housing?

The foreclosure crisis, coupled with ever increasing housing costs, demonstrates that we need a new approach to housing. The recession event of the past half-decade has forced a major reconsideration of the nation's housing model. Waves of foreclosures have prompted debate about the "housing as an asset" strategy, low-income housing tax credits, suburbanization, and sustainable community economic development (CED). In addition, rents have risen to new highs, and are "so far above wages that of the 3,141 counties in the United States, in only four of them can a person making minimum wage afford a one-bedroom apartment."<sup>1</sup>

Fortunately, the conditions in the housing market have created significant opportunities for community development corporations (CDCs) and for-profit corporations to join together and reconfigure a tired paradigm of suburban sprawl in the United States. Working together, CDCs and for-profit businesses can repair communities, strengthen local economies (particularly through the private sector), and lay a solid foundation for environmental and social welfare and health.

Market factors have converged to facilitate a move away from the suburbanization and sprawl that was driven in some part by incentives that pushed development away from urban centers. Instead, the future of housing will be driven back into the

city, where infill construction and urban design models such as New Urbanism and New Pedestrianism will provide the most beneficial—and efficient—models for community renewal.<sup>2</sup>

## Why Is Now the Perfect Time to Begin This New Approach?

Many may be shocked to discover that market preferences had begun to shift away from suburbanization and (back) towards city living before the market/mortgage crisis of 2008. It is estimated that miles driven by Americans peaked around 1998 and have since plateaued.<sup>3</sup> Furthermore, market analysis has shown that houses and housing complexes located in walkable neighborhoods and urban centers held their value— or even *increased* in value— during and shortly after the mortgage collapse of 2008.<sup>4</sup> Developers in major cities have noticed a greatly increased demand for infill homes in urban centers.<sup>5</sup> These various factors point towards an undeniably growing market preference for urban center living. Most importantly, this shift appears to be motivated not solely by the market crash but by the pure preferences of consumers; in essence, the American public has begun to see the value, convenience, and economic stability of urban living.

As the population continues to slowly filter back into urban centers, employers are still confronted with problems of recruiting and retaining a

reliable workforce. Complicating matters, the Baby Boom generation is primed to retire in massive droves and the demand for skilled labor and “rank and file” service employees will likely continue to grow along with the rebounding economy.

In short, development will be pushed back into urban areas. As large scale, urban-based employers seek to deal with the problem of recruiting rank and file employees, they likewise will confront the challenge of retaining a workforce that may have difficulty finding housing in urban areas due to either supply or costs. Opportunities exist for CBDs to partner with employers to create affordable housing options which will help revitalize communities and staff a recovering economy.

## So What Can CDC's and For-Profit Corporations ACTUALLY Do to Fix These Problems and Make a Profit?

Employers and developers can form partnerships to meet the affordable housing needs of employer's employees and maximize efficiency in this increasingly attractive housing opportunity. Such partnerships will prove a “win-win” for both classes of entities and communities in need of redevelopment. Partnerships in infill construction of Employer Assisted Housing (EAH) programs would allow CDCs to tap into the capital and development opportunities provided by for-profit business, and likewise

allow for-profits to collect on the hospitable community-building resources and outreach networks/expertise of nonprofit CDCs. Several factors, in turn, necessitate these partnerships:

### 1. Employers must attract and retain a reliable workforce through the use of Employer Assisted Housing Programs

Even in this recovering post-mortgage crisis economy, employers have noticed a shortage of skilled laborers.<sup>6</sup> Evidence strongly suggests that in fact there is no actual shortage of workers but rather a lack of affordable housing that restricts the employment options of an otherwise willing and ready workforce.<sup>7</sup>

Two factors in particular continue to frustrate this problem. First, housing production generally took a predictable nose-dive during the mortgage crisis. As a result, housing availability has generally failed to match rebounding job growth, and in-city housing prices (which as already mentioned, maintained or increased in value even during the market crash) have become increasingly unaffordable to most low and middle-income individuals and families.

The second issue is more nuanced and perhaps more difficult to remedy. The Low Income Housing Tax Credit (LIHTC) program was enacted as part of the United States Tax Reform Act of 1986. Its goal was to fund the development and rehabilitation of housing for low-income housing by allowing investors/developers of low-

income housing units a tax credit equal to a percentage of the costs of developing a low-income housing property. States are tasked with administering the tax credits based upon a Qualified Allocation Plan (QAP), which lays out the criteria for projects to receive LIHTCs. QAPs frequently allocate site points for development projects in the suburbs and underdeveloped land.

And poverty does not need help becoming suburbanized. As the Brookings Institute noted in its report on the suburbanization of poverty: “by 2008, suburbs were home to the largest and fastest-growing poor population in the country. Between 2000 and 2008, suburbs in the country’s largest metro areas saw their poor population grow by 25 percent—almost five times faster than primary cities and well ahead of the growth seen in smaller metro areas and non-metropolitan communities. As a result, by 2008 large suburbs were home to 1.5 million more poor than their primary cities and housed almost one-third of the nation’s poor overall.”<sup>8</sup>

## [2. Employers can counteract these effects by enacting Employer Assisted Housing programs](#)

EAH programs have been around for years. Interestingly enough, the first EAH programs served as a recruiting tool to attract senior executives and recruit management level employees. In recent years, however, EAH programs have tremendously expanded: today, EAH programs cater not only to management but to the “rank and file” workforce employee pool.<sup>9</sup>

The term EAH can be applied to really any form of employer financed housing assistance program (rental and homeownership models both exist). Typically, EAH programs include home buyer education, low-interest mortgage loans, down payment assistance (frequently either in the form of a forgivable or low-interest loan), and closing cost coverage. However, EAH plans can be more complex: securities, trust funds, group mortgage origination, and mortgage insurance are all potential options for employers adapt to the needs of their employees. EAH programs are by their very nature flexible instruments and—as we will see—uniquely suited for creative solutions.

The benefits to employers from EAH programs are profound: the employer enjoys a more stable workforce with an increased esprit de corps and bottom line savings from reduced recruitment, retention, and turnover costs. Employees likewise enjoy the benefits of homeownership/stable rental properties, decreased commuting costs, and (of course) an increase in nonrefundable time with family (the average American commutes nearly an entire hour every day, over 100 hours—or nearly 5 full days or 2 full working weeks—each year). In short, the benefits of EAH programs are both economic and noneconomic to both employers and employees.

Communities also stand to reap the substantial benefits of EAH programs. High (potentially unobtainable) housing prices disconnect communities, segregate classes, put resources and commerce out of reasonable distance, and of course congest roads with legions of commuters (putting lives and the environment at risk and increasing infrastructural costs). EAH programs serve as a means to give back to communities their defining feature, community members: diverse, eager to work, and ready for homeownership. In addition, of course, this influx of people into urban areas for employment purposes also has numerous positive economic externalities. Paramount among these is the fact that increased home ownership and rentals boost a community's tax base through a larger residential population and naturally expand retail and commercial

"In a national survey of more than 300 companies conducted by Harris Interactive, more than half (55 percent) of the largest companies (with more than 100 employees) acknowledge an insufficient level of affordable housing in their proximity. Two-thirds of these respondents believe that the shortage "is having a negative impact on retaining qualified entry-level and mid-level employees" and well more than half attribute some level of employee turnover to the resulting long commutes. In the same survey, more than half (57 percent) of the more than 1,200 workers polled say that they would consider moving closer to work if they could find affordable housing near their workplace. This figure jumps to 67 percent for households with annual incomes less than \$50,000 and 76 percent for respondents between the ages of 18 and 34."

Florence Wagman Roisman, Poverty, Discrimination, and the Low-Income Housing Tax Credit Program, Memorandum from LALSHAC, pgs. 10-11

opportunities to the current residents and businesses of urban areas.

## So What is the Role for CDCs?

As the current model stands, CDCs serve an important function within most EAH programs. Additionally, however, there are market forces at work as the housing market moves back to the cities that create opportunities for affordable housing in the context of EAH programs. CBDs should pay particular opportunities, given their dual expertise in development and affordable housing.

## 1. What can CDCs do in EAH programs?

EAH programs typically utilize CDCs and other nonprofit organizations through a triumvirate partnership structure consisting of the employer, the nonprofit organization, and a technical assistance provider. The employer naturally acts as the architect of the program, creating and funding the EAH model; the nonprofit organization functions as the administrative organ of the program, distributing the benefits and running the bulk of the EAH; finally the technical assistance provider steps in as an advisor, helping the employer structure the EAH program and assisting the nonprofit administrator in the continuing operation of the EAH.<sup>10</sup>

The current triple partnership model has its inarguable advantages. Most visibly, the employer saves time and resources by having the nonprofit administer the EAH program. The employees gain the benefit of having the nonprofit administrator—oftentimes CDCs with invaluable experience in housing counseling (credit reports, budgeting, loan pre-qualification, closing, etc.)—educate them on the necessary steps towards becoming homeowners.

## 2. In what role can CDCs make EAH programs more beneficial to employers, employees, and the community?

The triple partnership model of EAH programs should absolutely remain intact. However, given the current

market conditions and opportunities, CDCs should look to take a more proactive approach when engaging with EAH-ready employers. Namely, the time is right for CDCs to directly engage in development and redevelopment efforts in infill construction—construction in those urban areas where employers are located. CDCs possess certain distinct characteristics that make their lead in EAH housing development advantageous to employers and communities. In short, a greater “win-win” scenario for employers and nonprofits is achievable through corporate partnerships powered by urban CDC developers.

## **CDCs as Infill Developers for EAH Programs**

Infill development has no set definition, but can broadly be classified as construction or redevelopment efforts within an already built-up area—generally urban centers. Infill construction focuses on reconstituting and reclaiming buildings and lots through demolition, reuse, and renewal of blighted or undeveloped areas within urban centers. In short, infill construction comprises any development effort that seeks to turn underutilized urban property into new use property.

Most employers who will consider EAH programs for their workforce are the “anchor institutions” of their cities: hospitals, universities, manufacturers, and large service based corporations located directly



within or adjacent to urban centers. As such, any EAH construction components that these anchor institutions implement may likely fall into the category of “infill construction.”<sup>11</sup>

However, as it currently stands, it stands to reason that much of this EAH driven infill development could face significant barriers. Take for instance the statement from the Housing Partnership, a nonprofit dedicated to increasing the supply of affordable market rate housing in King County, Washington: **“In recent years, and due in large part to the mortgage crisis, many small and medium sized builders and developers have disappeared. The surviving small and medium developers have either moved to the very edge of the urban areas, where they can still find inexpensive land, or have moved into expensive niche markets. The large builders, pursuing economies of scale, now work primarily in master-planned communities or large subdivisions on the periphery. With this industry dynamic, an infill strategy becomes problematic. In high demand areas small builders will eagerly snap up available parcels, paying the extra development costs for difficult sites, confident they will get high prices for finished homes. It is not unusual to see developments of just a few expensive houses in East King County or Seattle. In most areas, however, infill opportunities have more difficulty attracting builders.”**<sup>12</sup>

Several key factors and advantages indicate that CDC developers should take the lead in these EAH infill constructions projects in order to make EAH programs more enticing, efficient, and worthwhile.

### 1. CDCs are more willing to develop urban areas and renew communities.

The financial crisis did inner cities and blighted urban centers no favors. Many cities have been left with abandoned properties and worsening states of urban decay. Violent crime, drug use, and vandalism rates can as a result increase, and drive businesses and residents further away from impoverished neighborhoods.

As such, for-profit developers may eschew development opportunities in blighted areas, and as a result, infill construction opportunities go unfulfilled and housing prices in urban centers remain high. Real estate that would otherwise be ideal for EAH residency development may instead go undeveloped due to the additional burden of taking on community redevelopment.<sup>13</sup> Projects of this nature can be, to for-profit organizations, a high risk venture.

On the other hand, CDC developers see these blighted areas as an opportunity and are far less averse towards these types of urban homesteading projects. Obviously many make urban renewal projects their nonprofit purpose and already have outreach networks in place to confront the challenges of community redevelopment.<sup>14</sup>

## 2. Unique financing options exist to assist CDCs in infill development.

CDCs have available to them a number of financing options that for-profit corporations cannot access. Federal subsidies encouraging partnerships, grants, and philanthropic funding exist to help CDCs and other nonprofits access capital for infill/urban development.

For instance, the Partnership for Sustained Communities initiative is a federally sponsored interagency program that in large part targets nonprofit development corporations in order to promote urban center redevelopment efforts. The program connects nonprofits to sources of government funding for infill and urban development. CDCs may also apply for municipal and state grants that target infill construction.

## 3. CDCs can expend time and influence to handle the often difficult process of infill construction.

Urban infill construction is oftentimes overburdened with local land use regulations and permitting processes (many times multiple permitting hearings) that drive time commitments and costs up, thus making infill development less profitable for (and less attractive to) for-profit institutions. Additionally, for-profits may run into opposition from community members who fear potential negative externalities from EAH infill construction (such as increases in traffic, crime, and

decreased property values; data indicates that these concerns are usually baseless and frequently contrary to, or at least outweighed by, the actual positive externalities on urban centers from infill construction).<sup>15</sup>

CDCs are often more fit to confront these challenges than their for-profit counterparts. For instance, CDCs are not absolutely driven by the bottom line, but are instead motivated by social change and community development. A CDC infill developer would not have the profit driven concerns that frighten for-profits away from the permitting process. CDCs are also more apt to handle community concerns, as many have (or are socially networked to) organizations with sophisticated outreach efforts and resources already in place.

## 4. CDC infill developers can provide employers with creative options for their EAH systems that for-profit developers simply cannot.

The benefits derived by employers from CDC run infill developers extend into the structures of the EAH programs themselves. For instance, one of the commonly used EAH mechanisms is the housing-site subsidy: an employer will sell or lease land at a discount to a developer *or* donate land to the developer. As 501(c)(3) tax-exempt organizations, CDC infill developers would be able to accept these land donations as charitable contributions. Employers would in turn be able to write the donation off as tax deductible. To



employers “rich” with seemingly useless in-city greyfield properties or hoping to establish housing in particularly blighted communities, this option is particularly enticing. It is worth noting here that while some anchor institutions may themselves be 501(c)(3) tax-exempt organizations incapable of taking any sort of tax deduction, many anchor institutions are simply for-profit corporations.

Of course, there will be concerns around the possibility of violating the private inurement doctrine. The private inurement doctrine “precludes individuals who have close relationships with and the ability to exercise control over a 501(c)(3) public charity from benefiting unfairly or unreasonably from that charity's income or assets<sup>16</sup>” and is “likely to arise where the financial benefit represents a transfer of the organization's financial resources to an individual solely by virtue of the individual's relationship with the organization, and without regard to accomplishing exempt purposes.<sup>17</sup>” However, these fears can be assuaged—and communities strengthened—by reserving a percentage of the resulting housing complex for low-income individuals or even dividing the EAH program housing project among other fellow employers as well as other charitable organizations.

Additionally, it should be noted that issues of private benefit and the operational test of Revenue Procedure 96-32 may arise in this context.<sup>18</sup> CDCs should be careful of these problems as they work with employers.

In the context of this New Pedestrianism approach, partnerships between CDCs and employers wishing to develop EAH programs is a true win-win. With the backing of CDCs and their ability to alleviate many of the community concerns, employers will be able to build high density, but sustainable, housing complexes that will shelter their workforces, benefit the community through increased business accessibility and taxable base, and leave cities with a smaller carbon footprint.

## New Pedestrianism: a Model for EAH Pedestrian Villages

Finally, EAH providers and CDC developers would do well to style their housing projects in the Pedestrian Village style of the New Pedestrianism movement. Pedestrian villages utilize multifamily housing units, mixed-use village centers, and traditional pedestrian-oriented street patterns to combat the environmental and health problems endemic to commuter culture and low-density dispersed development. As we saw earlier, market preferences have begun to shift back towards walkable cities, and economic data bears out that walkable neighborhoods have higher property values, attract new workers, and indirectly lower taxpayer costs.<sup>19</sup> Of course, these Pedestrian villages are also able to handle up to 4 times the density of the average single-family housing

development—making them ideal for employers who hope to efficiently house their potentially large labor force in affordable, cost-efficient housing, says Michael E. Arth, founder of the New Pedestrianism movement.

The tenets of New Pedestrianism espouse sustainability and adaptive reuse: qualities EAH programs and their CDC infill developers should follow. Adaptive reuse statutes may make the arduous permitting, zoning, and variance processes associated with infill development less stringent and relax the zoning requirements on urban centers that would otherwise prevent multifamily housing unit construction.<sup>20</sup> This, in effect, mitigates some of the financial and process challenges zoning for Pedestrian villages. Employers would additionally reap the benefits of combining affordable housing, employment, and sustainability—in the labor force and the community which nests their business.

## Conclusion

Given the needs of and benefits to communities in this rebounding economy, employers wishing to attract and retain employees in this competitive economy would be wise to partner with CDC urban infill developers in the construction of Pedestrian village housing complexes through EAH programs.

## Additional Resources

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Anna Afshar, New Arguments for Employer Assisted Housing, New England Community Developments (Federal Reserve Bank of Boston) Issue 1, 2006.

Bill Ryan, Economic Benefits of a Walkable Community, Let's Talk Business (July 2003), <http://www.uwex.edu/ces/cced/downtowns/ltb/lets/0703ltb.pdf>

Conrad Defiebre, Driven to poverty in the suburbs, Twin Cities Daily Planet (March 2013), <http://www.tcdailyplanet.net/news/2013/03/14/driven-poverty-suburbs>

Elliot Njus, Burned at suburban edge, Renaissance Homes turns to urban core, The Oregonian (September 21, 2011), [http://www.oregonlive.com/business/index.ssf/2011/09/burned\\_at\\_suburban\\_edge\\_renaiss.html](http://www.oregonlive.com/business/index.ssf/2011/09/burned_at_suburban_edge_renaiss.html)

Florence Wagman Roisman, Poverty, Discrimination, and the Low-Income Housing Tax Credit Program, Memorandum from LALSHAC (November 2000), <http://indylaw.indiana.edu/instructors/roisman/lihtcmemo.pdf>

Florida Housing Coalition, EAH: Employer Assisted Housing, The Florida Housing Coalition News Network Journal (January 2012), <http://www.flhousing.org/wp-content/uploads/2012/06/Employer-Assisted-Housing.pdf>

Homes for Working Families, Understanding Employer Assisted Housing: A Guidebook for Employers (2007), <http://www.msgcrc.com/pdfs/UnderstandingEmployerAssistedHousing.pdf>

Kaid Benfield, Geography of housing recovery favors cities and walkable neighborhoods, Natural Resource Defense Council Staff Blog (October 26, 2011), [http://switchboard.nrdc.org/blogs/kbenfield/geography\\_of\\_housing\\_recovery.html](http://switchboard.nrdc.org/blogs/kbenfield/geography_of_housing_recovery.html)

Keith Wardrip, Laura Williams, and Suzanne Hague. "The role of Affordable Housing in Creating Jobs and Stimulating Local Economic Development: A Review of the Literature ." (January 2011), <http://www.nhc.org/media/files/Housing-and-Economic-Development-Report-2011.pdf>

Michael E. Arth, Democracy and the Common Wealth: Breaking the Stranglehold of the Special Interests, Golden Apples Media (2010)

Policy Link, Employer Assisted Housing, <http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406d-a6d5-eca3bbf35af0%7D/EMPLOYEEASSISTEDHOUSING.PDF>

Virginia McConnell and Keith Wiley, Infill Development: Perspectives and Evidence from Economics and Planning, Resources for the Future Discussion Papers (May 2010), <http://www.rff.org/rff/documents/RFF-DP-10-13.pdf>

Sam Newberg, Practitioners Seeing Shift to Urban Living on the Ground, Confirming Forecasts, UrbanLand (August 30, 2011), [http://urbanland.uli.org/Articles/2011/August/NewbergMultifamily?utm\\_source=uli&utm\\_medium=eblast&utm\\_campaign=090611](http://urbanland.uli.org/Articles/2011/August/NewbergMultifamily?utm_source=uli&utm_medium=eblast&utm_campaign=090611)

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<sup>1</sup> Julian Edney, How Rent Makes Poverty, The Baltimore Chronicle (November 17, 2006), <http://baltimorechronicle.com/2006/111706EDNEY.html>

<sup>2</sup> For definitions of infill construction and New Pedestrianism, see pages 7 & 10, respectively.

<sup>3</sup> Anita Elash, Are we reaching peak car?, The Globe and Mail (Oct. 22, 2011), <http://www.theglobeandmail.com/news/national/are-we-reaching-peak-car/article2210139/singlepage/#articlecontent>

<sup>4</sup> Kaid Benfield, Geography of housing recovery favors cities and walkable neighborhoods, Natural Resource Defense Council Staff Blog (October 26, 2011), [http://switchboard.nrdc.org/blogs/kbenfield/geography\\_of\\_housing\\_recovery.html](http://switchboard.nrdc.org/blogs/kbenfield/geography_of_housing_recovery.html)

<sup>5</sup> Elliot Njus, Burned at suburban edge, Renaissance Homes turns to urban core, The Oregonian (September 21, 2011), [http://www.oregonlive.com/business/index.ssf/2011/09/burned\\_at\\_suburban\\_edge\\_renaiss.html](http://www.oregonlive.com/business/index.ssf/2011/09/burned_at_suburban_edge_renaiss.html)

<sup>6</sup> Florida Housing Coalition, EAH: Employer Assisted Housing, The Florida Housing Coalition News Network Journal (January 2012), <http://www.flhousing.org/wp-content/uploads/2012/06/Employer-Assisted-Housing.pdf>

<sup>7</sup> Keith Wardrip, Laura Williams, and Suzanne Hague. "The role of Affordable Housing in Creating Jobs and Stimulating Local Economic Development: A Review of the Literature ." (January 2011), <http://www.nhc.org/media/files/Housing-and-Economic-Development-Report-2011.pdf>

<sup>8</sup> Emily Garr and Elizabeth Kneebone, The Suburbanization of Poverty: Trends in Metropolitan America, 2000 to 2008, Brookings Institute Paper (January 20, 2010), <http://www.brookings.edu/research/papers/2010/01/20-poverty-kneebone>

<sup>9</sup> Homes for Working Families, Understanding Employer Assisted Housing: A Guidebook for Employers (2007), <http://www.msgcrc.com/pdfs/UnderstandingEmployerAssistedHousing.pdf>

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<sup>10</sup> Anna Afshar, New Arguments for Employer Assisted Housing, New England Community Developments (Federal Reserve Bank of Boston) Issue 1, 2006.

<sup>11</sup> See Initiative for a Competitive Inner City, “Inner City Insights Anchor Institutions and Urban Economic Development: From Community Benefit to Shared Value,” Inner City Insight Findings, Vol. 1 Issue 2 (June 2011), [http://www.icic.org/ee\\_uploads/publications/ICIC\\_RESEARCH\\_anchor\\_institutions\\_r2.pdf](http://www.icic.org/ee_uploads/publications/ICIC_RESEARCH_anchor_institutions_r2.pdf)

<sup>12</sup> Filling in the Spaces:  
Ten Essentials for Successful  
Urban Infill Housing (November, 2003),  
<http://www.mrsc.org/artdocmisc/fillingspaces.pdf>

<sup>13</sup> See Myron Orfield, *Metropolitics: A regional agenda for community and stability*, Washington DC: The Brookings Institution Press (1997).

<sup>14</sup> For an illustration of this concept in action, see Jeffery Fraser, East Liberty finds formula for success, Pittsburgh Post-Gazette (September 25, 2011), <http://www.post-gazette.com/stories/local/neighborhoods-city/east-liberty-finds-formula-for-success-316408/>

<sup>15</sup> See Virginia McConnell and Keith Wiley, Infill Development: Perspectives and Evidence from Economics and Planning, Resources for the Future Discussion Papers (May 2010), <http://www.rff.org/rff/documents/RFF-DP-10-13.pdf>

<sup>16</sup> Guidestar, The Private Inurement Prohibition, Excess Compensation, Intermediate Sanctions, and the IRS’s Rebuttable Presumption: A Basic Primer for 501(c)(3) Public Charities, <http://www.guidestar.org/rxg/news/publications/private-inurement-primer.aspx>

<sup>17</sup> A Guide to Federal Tax Issues for for Colleges and Universities, Private Inurement and Excess Benefit Transactions,  
[http://www.federaltaxissues.com/0300\\_private/0310\\_private\\_principles.php](http://www.federaltaxissues.com/0300_private/0310_private_principles.php)

<sup>18</sup> Rev. Proc. 96-32, 1996-1 C.B. 717, 1996-20 I.R.B. 14. [http://www.irs.gov/pub/irs-tege/rp\\_1996-32.pdf](http://www.irs.gov/pub/irs-tege/rp_1996-32.pdf)

<sup>19</sup> Bill Ryan, Economic Benefits of a Walkable Community, Let’s Talk Business (July 2003), <http://www.uwex.edu/ces/cced/downtowns/lbt/lets/0703lbt.pdf>

<sup>20</sup> For a model of these adaptive reuse statutes, please see the City of Los Angeles Adaptive Reuse Program Handbook available at <http://www.scag.ca.gov/Housing/pdfs/summit/housing/Adaptive-Reuse-Book-LA.pdf>