

# Summary of Symposium Discussion

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This, the third symposium sponsored by the U.S. Department of Housing and Urban Development (HUD) and hosted by Fannie Mae, focussed on the assumption that legitimate environmental interests must be protected, in part through some regulation or restriction of private development activity. It was also assumed that—as with all interventions that limit resources, impose requirements, or delay action—environmental regulations were likely to affect the form and cost of development. On the other hand, it was acknowledged that, because real estate developments are affected by a great number of locally specific and constantly changing interactive variables, the precise impact of a given regulation on a specific development is often extremely difficult to quantify.

## Growth and the Environment

James Carr, Fannie Mae's vice president for housing research,<sup>1</sup> opened the symposium by outlining two approaches to making housing more affordable to consumers. The first approach would be to lower the cost and increase the availability of financing for housing. Less-expensive financing reduces initial and long-term outlays, enabling more households to purchase homes. Making home financing more widely available also expands the potential for homeownership. This approach has been advanced by recent improvements in data availability, the requirements of the Community Reinvestment Act, and new market realities, such as the demand generated by immigrant populations.

A second approach to making housing more affordable would be to control the cost of housing production, in part by minimizing the extent and impact of development regulations on housing costs. Since the days of the first zoning laws, development regulations have influenced urban growth patterns and the cost of land and construction. The proliferation of regulations, particularly the many urban growth restrictions and environmental laws, have had a profound observable impact on housing affordability, even though their impact on housing costs has not been systematically studied. The symposium, Carr concluded, would help lay the groundwork for proposed improvements in the management of environmental laws and the way they affect urban development, so that “we can continue to ensure the protection of our natural resources while lowering the effect of these laws on housing costs.”

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## Environmental Focus as Part of HUD's Mission

Margery Austin Turner, a Deputy Assistant Secretary in HUD's Office of Policy Development and Research (PD&R), noted that historically, the housing movement had an environmental focus that is reflected in HUD's basic mission of providing a decent home and a suitable living environment. In fact, the Department's creation 30 years ago represented the culmination of a unified housing and environmental mission. But over the past three decades, she continued, the regulatory and political systems for the built environment developed separately from those of the natural environment. The result has been a heightened sense of conflict between the goals of developers and those of environmentalists. Turner suggested that the symposium participants discuss these conflicts, not with the goal of achieving immediate consensus but to gain a better understanding of the issues and develop concrete proposals for research and policy development.

Echoing her charge to the participants, symposium moderator Michael Wheeler, a professor at the Harvard Business School, termed the symposium "an exercise in agenda-building—making sure the right questions are on the table." Cautioning that no one should go away "unscathed," he urged participants to inform and challenge themselves and one another.

## Background Paper: Impact of Environmental Mandates on Urban Growth

Douglas Porter, president of the Growth Management Institute, described the paper he had coauthored with Lindell Marsh and David Salvesen as a review of issues for discussion, noting the "lack of hard-nosed research on what environmental mandates really mean to housing development." Yet, referring to Professor Bernard Frieden's book, *The Environmental Hustle*, Porter observed that environmental permitting clearly affects the way development occurs, or whether it occurs at all. He described growth management on the metropolitan or regional scale and environmental protection as two sides of a coin, which means "two ideas with money between them." After summarizing the core issues in the relationship between environmental protection and urban growth, Porter noted that, despite their adverse effects on urban growth, environmental laws do advance the goals of environmental protection. However, no research has been done to determine the way to balance the various societal objectives.

Lindell Marsh, a partner in the law firm of Siemon, Larsen and Marsh who represents developers in land use disputes, raised additional issues and expressed concern that HUD's urban development focus has been eclipsed in recent years by housing concerns. He urged HUD to give more consideration to urban development and the urban environment. Establishing environmental protection rules by collaboration before urban development is planned has proven successful, he noted. In southern California, roundtables of interested parties have created plans to protect wildlife in as-yet-undeveloped areas. When developments are proposed, the process and requirements are already understood and the wildlife conservation issues have been identified. The result has been greater efficiency, lower costs, and less contention over development in environmentally sensitive areas.

## Response to the Background Paper

Three individuals who had been asked to comment on the issues raised in the discussion paper presented their views. Michael Rose, president of Michael T. Rose Companies, a homebuilder and self-described environmentalist, stressed the need for partnerships between environmentalists and homebuilders in order to achieve reasonable, affordable

urban growth. The second respondent, Erik Meyers, who is general counsel for the Environmental Law Institute (ELI), agreed with the substance of the issues raised in the paper, but emphasized, “We must be able to say ‘no’ when development is unsustainable.” The third respondent, Julie Metz, an ecologist with the U.S. Army Corps of Engineers, assured the group that her agency tries to reconcile the interests of applicants and environmentalists and usually grants the requested permits after “a lot of give and take on both sides.”<sup>2</sup> Citing the National Environmental Policy Act (NEPA) as an example, Metz affirmed that the environmental statutes were not designed to make development harder. They have a purpose and have, by and large, been effective. She agreed, however, that the existing regulatory tools need improvement, especially in defining appropriate governmental roles and encouraging the reconciliation of Federal, State, and local requirements.

During the discussion period that followed, moderator Michael Wheeler raised two additional issues:

- What is it that makes Federal environmental regulations particularly onerous to developers, given that local land use regulations have existed for almost a century?
- Does the urban environment call for treatment different from that of rural and wilderness areas? If so, should there be recognition that in urban areas the cost of environmental regulation may be higher and the benefits lower than in rural areas?

## Issues Related to Growth and the Environment

Following the presentation of the paper, symposium participants discussed issues related to the process of regulating development to protect the environment and addressed the effects of such regulation. Key issues raised during the discussion are presented below.

### Questions of Accountability

In response to Michael Wheeler’s question about why Federal environmental regulations are perceived to be particularly onerous, Gus Bauman, an attorney with the firm of Beveridge & Diamond and former chairman of the Maryland-National Capital Park and Planning Commission, pointed out that a major difference between Federal and local laws is the matter of accountability. Local officials are not accountable when dealing with Federal law, but land use has been a local function under State authority, with local officials readily identifiable and directly accountable to the affected parties (who may be their neighbors). On the Federal side, environmental laws have become a back door to land use control, he said. “It is impossible to get someone in charge to correct something that is not right.”

In addition, noted Virginia Albrecht, also a partner with Beveridge & Diamond, “There are so many agencies involved in the process that nobody is responsible.” For example, in the area of wetlands, the Corps of Engineers, the U.S. Environmental Protection Agency (EPA), the U.S. Fish and Wildlife Service, the National Marine Fisheries Service (NMFS), State fish and game agencies, agencies that manage cultural resources, and others each play a role. “Because of the structure of the CWA [Clean Water Act], there is no decisionmaker,” she said.

### Lack of Effective Judicial Review

A related problem, commented Stanley Gordon, chairman of Sunset Ridge, Ltd., in Newport Beach, California, is the lack of an effective process of judicial review, as the courts often prefer not to review the determinations of administrative agencies.

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## Extent of Regulatory Impact

Peter Buchsbaum, an attorney with Greenbaum, Rowe, Smith, Ravin & Davis of Iselin, New Jersey, stated that “The federalization of the land use business, with very powerful regulatory tools, is the real problem.” He added that programs such as historic preservation and the water pollution discharge permit system differ from local land use controls in that they, like CWA or the Endangered Species Act (ESA), are unpredictable and can shut down a project more readily than zoning regulations, which do allow some designated use of the land. “There’s nothing the locals can do to you that’s as pervasive as a sewer moratorium,” he said.

## Unfair Distribution of Costs and Benefits

Virginia Albrecht echoed the concerns about the Federal Government’s lack of accountability and made several observations regarding Federal wetlands and endangered species laws. When these laws restrict the use of land, she noted, no cost-spreading mechanism is available, and all costs must be borne by the landowner. In many cases, Albrecht noted, the affected parties are small landowners, not large development companies with many advisors that can absorb the costs involved. While some loss of use may occur through zoning, there is a reciprocal benefit because the landowner retains some use of the land. With the Federal laws, the stakes are much higher. “It’s go or no go,” she commented. Federal statutes are administered by single-purpose agencies that have no need to balance various values and interests. At the local level, more balance is necessary.

Environmental protection offers local as well as national societal benefits, commented Will Schroeer, an economist with EPA’s Office of Policy Analysis. Protection of wetlands, for example, facilitates the recharge of aquifers and the conservation of wildlife and recreation areas. Localities can help the public understand the nature of shared benefits and can help to spread the costs of maintaining access to the facilities.

Schroeer also suggested that discussion of the effects of environmental regulation on housing affordability must include all of the costs that relate to location. In addition to the factors that increase initial housing costs, consideration must be given to the long-term costs associated with living in the home. These costs include operation and maintenance of the home and transportation to and from daily activities. But Schroeer also contended that there is no reason why environmental regulation need foster spread-out development, or urban sprawl. “I think that we have used it in such a way that that is the case,” he said, “because we would like to spread development out for other reasons.”

## Lack of Clear Goals and Priorities

Michael Barker, executive director of the American Planning Association, suggested that the proper approach to setting clear goals is to develop a concept of the desired result, and then study the systems that produce such results and make the adjustments necessary to attain the desired status. He suggested that the roles and responsibilities of the various levels of government would emerge during the planning process.

Daniel Mandelker, a professor at the Washington University School of Law, agreed, adding that in order to make the regulatory process more predictable, the Federal Government must set substantive priorities, clearly stating its goals and prioritizing them.

## The Permitting Versus the Planning Approaches

Several participants agreed with Mandelker, adding that States and localities should assume more authority and more responsibility. Certain projects should not be built, and some regulation is needed, acknowledged Jonathan Rose, president of the Affordable Housing Construction Corporation of Katonah, New York. However, he argued, “We are inventing a million little laws rather than creating an orderly system.” He cited Oregon’s Growth Management Act as an example of an orderly system that has resulted in an urban growth boundary, farmland preservation, and increases in both the volume of housing production and its affordability. He called for a national system of development regulation that is predictable, indicates what is “as of right” (that is, clear and firm with no regulatory agency discretion permitted), and encourages land use that recognizes the limitations of fossil fuel consumption (for example, development around infrastructure nodes). Rose would encourage a regional system that works through counties and other existing political entities.

Concurring that the permit-by-permit approach yields no clear wins, Erik Meyers asserted that planning and information-driven mechanisms such as NEPA can be effective tools. He called for a planning approach to regulation, pointing out that many environmental laws are not forward-looking and tend to be enforced only when a crisis develops. As a result, the best tools for environmental protection are emerging in areas where a crisis atmosphere has created high stakes in housing and the environment, such as southern California.

Daniel Mandelker encouraged a restructuring of the environmental protection regulatory system to resolve problems that have resulted from the interplay of Federal, State, and local roles and from the permit-versus-planning approach. He reminded the group that in the 1970s, when environmental protection began in earnest, there was extensive debate about whether to create a national land use policy act that would require planning first or to establish a permit system. The permit approach won, according to Mandelker, partly because the environmentalists did not trust the local zoning process to protect the natural environment and partly because their motivation “was primarily negative . . . they wanted to stop things rather than facilitate.” Today, the discussion has returned to the need for some sort of planning system.

Yet, he cautioned, some areas, such as coastal zones and wetlands, represent finite and diminishing physical resources that are addressed more appropriately through existing permitting programs than through zoning. Daniel Mandelker described himself as a “fan of Federal monitoring and State and local implementation,” an approach that would mean “we may have to accept a certain amount of limiting of Federal interest.” One way to implement such an approach, he advised, would be to reformulate Federal-State relationships to combine Federal guidelines and funding incentives with State and local planning and implementation.

A model of integrated planning can be found in the once-active Section 701 Comprehensive Planning program, pointed out Richard Alexander, director of environmental planning in HUD’s Office of Community Planning and Development (CPD). Enacted in 1972, Section 701 integrated many aspects of planning at the local level. Such a mechanism might be used today to build environmental protection into urban development planning and to share such information with the development community.

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Antoinette Sebastian, an environmental planner in CPD, suggested that if individual States have the power to decide whether or not to protect their environmental resources, society may have to bear costs resulting from neglect. For example, if a State chooses to allow development in low-lying coastal areas and that development is destroyed by storms, society at large will likely be asked to help rebuild the area.

Sebastian called for a cost accounting of natural resources so that communities electing not to protect certain areas know the cost of the decision. She pointed out that only five biological systems—cropland, forest, grassland, ocean, and fresh water lakes—are needed to supply all of our food and the raw materials for industry. The benefits of these resources need to be well understood, she said, because “Once they’re gone, they’re gone.”

## Impact on Development Markets

Franklin Martin, president of Shaw Homes, Inc. of Chicago, expressed concern that environmental regulations are often enacted without an understanding of development market dynamics and can therefore have an unforeseen impact. Reminding the group that residential developments are driven by market conditions and timing, Martin noted that environmentally responsible practices are good business and often are profitable business but are more properly implemented or interpreted at the regional level. He gave the example of a much-needed major development initiative in inner-city Chicago that was delayed 1½ years because of a historic preservation issue, “which absolutely paralyzed the entitlement process and almost killed the project.” Despite the fact that the project will greatly benefit a distressed inner-city community, “it was almost strangled by the process.” Correcting such problems, Martin continued, will require an understanding of the economic importance of timing and time efficiency during the development process.

Concurring, James Harter, senior vice president of the New Hall Ranch Division, New Hall Land and Farming Company, Santa Clarita, California, echoed the call for understanding the costs of delayed development. He suggested that development planning begin with consideration of the market for housing—what kinds of homes people want and where they would like to live. Citing an array of governmental requirements that increase housing production costs, Harter added, “We need an advocate for housing affordability.” He maintained that he does not find such advocates among HUD field office staff, describing his experience with them as frustrating because “they often have their own agenda, have no sense of urgency, and no creativity.”

James Hoben, a community planner in PD&R, concurred with the call for better planning to maximize certainty for developers. He observed that public planners do not always understand the private market and need feedback systems that will tell them how their planning, regulatory, and permitting activities affect the private land market system, particularly the supply and location of developable land. Hoben offered Portland, Oregon, as an example of a city whose business community and government planners work together to ensure a competitive market supply of land.

## Need for Cooperation Among Development and Environmental Interests

Charles Field, staff vice president and regulatory counsel at the National Association of Home Builders (NAHB) suggested a more cooperative approach, noting that over time, the approach to problemsolving has gone from a collaborative system to a highly competitive, challenging, and adversarial one.

Erik Meyers echoed the call for greater cooperation. Responding to concerns that the regulatory environment fosters urban sprawl and acknowledging that many cities are becoming hollow at the core, he challenged HUD and the development community to work together to find ways to remake America's urban areas. Many of the tools and authorities needed for redevelopment are in place, Meyers noted, but "we must have the political will to follow through." As proof that many groups are already rethinking development, he described a recent report issued jointly by the Bank of America, California Department of Environmental Resources, and Greenbelt Alliance that deplored "slash-and-burn" urban sprawl and called for a new paradigm of urban development. Meyers believed this report to be particularly significant because it was sponsored by one of the Nation's major development lenders.

Michael Rose stressed the need for partnerships, cooperation, and flexibility among environmentalists and homebuilders. Although there have been abuses and unfairness on both sides, he explained, homebuilders who are willing to negotiate to an 80-percent point of view on environmental protection cannot work well with environmentalists who are absolute in their insistence on no growth. Rose indicated that his call for cooperative action was based on the fact that his firm had encountered serious obstacles when trying to obtain approvals for environmentally sensitive plans. He called for reevaluation of basic laws, especially CWA, to make the process more rational.

Rose expressed concern that many environmental laws are based on the idea of "command and control" and show little understanding of the housing market. As a result, one-half of the applicants for development projects give up and move on. He suggested that legislators should take into account the economics of development as well as environmental concerns, perhaps through incentive-based or market-based regulations. HUD has already done much of the necessary groundwork, Rose noted, by publishing model land development standards, which should now be implemented. The Department has also published a report, *Not In My Back Yard*,<sup>3</sup> that outlines the way laws and regulations affect housing affordability. Rose suggested that HUD encourage local governments to use the recommendations in these documents to fashion and implement their development requirements.

## Strategies for Reconciliation

Margery Turner and Michael Wheeler opened the afternoon session by suggesting the following topics for discussion:

- How can Federal environmental laws be reinvented to foster a better balance of costs and benefits, greater accountability, better coordination, and greater efficiency?
- What role should HUD play in reconciling environmental protection and urban development needs?
- What additional research is needed by HUD or other Federal agencies?

## Reinvention of Federal Environmental Laws

**Improve the Clean Water Act (CWA).** Michael Rose proposed the following changes to CWA which does not, he noted, use the word *wetlands* on any of its 510 pages:

- Coordinate and streamline the Federal, State, and local environmental permitting processes.
- Eliminate Federal/State overlap and duplication of authority.



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- Define the term *wetlands* clearly.
  - Eliminate or rework the alternative analysis provision of the law that requires developers to defend their proposals against all other possible choices.

Julie Metz advised that the Clinton wetlands plan addresses some of those issues. In many cases, a State's general permit program allows continuation of development activities without notice to the Corps of Engineers, depending on the impact of the unreviewed activities. The State general permits devolve responsibility, coordinate conflicting requirements, and encourage piggybacking of State environmental protection laws with Federal laws. Metz indicated that even though there is an existing wetlands definition, the Corps is trying to "get more science into the wetlands delineation manual." But, she added, "the requirement that developers consider alternatives to developing wetlands will continue."

David Engel, director of PD&R's Affordable Housing Research and Technology Division, asked the group's opinion as to whether the Federal wetlands program should continue to exist. In response, Daniel Mandelker called for a definition of the national interest in this area, noting that the current statute contains no criteria or standards. Assuming that a Federal program is needed, he continued, the legislation could require a regulatory component that would provide predictability—for example, through advance designation of wetlands areas.

Peter Buchsbaum agreed, adding that the Federal Government needs to "define the resource and get the mapping done, so that everyone knows the rules of the game." He acknowledged that obtaining the information will be costly but added that it will be far less expensive than "all the consultant and lawyer fees that go into case-by-case battles."

**Resolve issues relating to payment.** The issue of financial responsibility for a development that is denied must be resolved, according to David Engel. Allowing a local government to make that determination complicates the problem. "If no economic use remains," he said, "someone must pay, and no local government will stop a development if it must pay for a taking."

**Create a system that integrates urban development and environmental protection.** Participants generally agreed that the existing system of protecting the natural environment through scattered and duplicative permit requirements should be replaced. They suggested creating a system based on regional and local planning for growth and development that incorporates environmental protections. Suggestions for creating a new system included the following actions at the Federal level:

#### **1. Improving the process of Federal environmental regulation:**

- Achieve consensus on a long-term plan and a regulatory commitment to the plan so that all players know what is expected of them.
- Encourage a regional or areawide process that protects agreed-upon resources and makes the development/environmental protection tradeoffs visible, yet is still able to stop development when necessary.
- Establish a more locally sensitive process based on reasonable standards. Consider empowering metropolitan organizations to identify resources in advance, issue general permits, and coordinate with other purpose-based metropolitan organizations, such as transportation organizations. This process will require Federal encouragement and a rearrangement of the Federal permitting system.



- Make basic substantive decisions and set goals; only then can the process questions be resolved and a locally based planning system be instituted. Require that environmental laws give serious consideration to State and local plans when regulations are implemented. Involving the community would make the process more predictable.
- Encourage institutional capacity building as part of the cooperative process. Enable local governments to issue permits when Federal standards are met.
- Consider whether the treatment for the urban environment should differ from the treatment for rural or wilderness areas, and determine whether and where such differences are already in the laws.

## **2. Improving the way Federal environmental laws are implemented:**

- Encourage greater Federal accountability through single-agency regulation and review. Congress should designate a lead agency for each Federal environmental program and should give that agency the authority to set rules, make decisions, and coordinate the actions of other Federal participants. Implement Federal environmental laws by establishing both interim guidelines for making decisions on individual development proposals and an ongoing process for integrating development planning and environmental decisionmaking.
- Encourage court reform, the creation of a specialized court system, or an alternative dispute resolution program to provide effective reconciliation of differences. Reforms should address the State and local roles, eliminate the “gotcha!” mentality, and hold local Federal field office representatives accountable for their decisions.

## **HUD’s Role**

One participant cautioned that, historically, HUD has demonstrated little ability either to influence local land use or to act as a negotiator with other Federal agencies. However, several other participants recommended specific actions HUD should take to help reconcile housing and urban development needs with environmental protection goals. The recommendations include the following:

- Advocate homeownership for families at all income levels. If families are to advance from renting to ownership and then to trade up to larger or more luxurious homes, homes must be available in a wide range of prices.
- Evaluate and comment on the urban and economic impacts of regulations promulgated under CWA and ESA.
- Establish guidelines for environmentally responsible development, along with incentives or credit enhancements to encourage developers to follow those guidelines.
- Establish a collaborative planning process involving relevant Federal agencies. Hold the Corps of Engineers and EPA accountable for meeting their deadlines for review so that HUD can meet its urban development goals.
- Consider the establishment of a block grant program to fund comprehensive planning. Collaborative, integrated planning should replace categorical planning (as, for example, for farmland preservation, preservation of historic or cultural areas, or environmental protection). Ensure participation by “voiceless” HUD clients, such as renters or the homeless, as well as by homeowners.

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- Consider use of a credit enhancement or the creation of a system for “banking” benefits similar to the Transferable Development Rights concept. Such a system would make the impact of environmental regulations more economically equitable.

## Additional Research Needs

The participants also suggested several areas in which research by HUD or other Federal agencies would be helpful. These areas included:

### **1. Evaluating the existing system of environmental protection and its record of performance.**

- Calculate the real economic and social costs and benefits to individuals and society of specific environmental regulations.
- Determine whether environmental regulations have achieved their intended goals. For example, what has been the result of the Vermont experience with environmental regulation?
- Use historical benchmarking to determine the successes achieved in environmental protection over the past 15 years and why they have succeeded. The objective of the research would be to find an “economic point of diminishing returns.”
- Determine what has *not* been accomplished—that is, what land has not been saved that should have been? What permits were, or were not, granted? What have been the results?
- Determine whether wetlands regulations have had a measurable impact on urban growth and, if so, determine the nature of that impact. Have factors other than wetlands, such as the building of infrastructure, actually driven development patterns?
- Determine whether environmental regulations play a major role in encouraging or inhibiting the development of affordable housing, or whether other factors are more influential.
- Evaluate the methodology of environmental impact statements (EISs) by examining EISs written 10 years ago to see whether the predictions made then have proved accurate.
- Evaluate the effectiveness of incentive-based programs such as the wetlands reserve and farm reserve programs.
- Determine the true cost of regulating wetlands, including not only the Corps of Engineers’ wetlands regulatory budget of \$100 million a year, but also the funds from EPA, the Fish and Wildlife Service, and other Federal agencies.

### **2. Identify barriers to restructuring the existing environmental protection system.**

- Identify political and other factors that have created the present system and inhibit a rational restructuring.

### **3. Anticipate the results of development, in order to facilitate goal-setting.**

- Create a model of proposed development so that affected communities visualize its appearance when completed.
- Evaluate the cumulative effects of individual development projects on the natural environment.

- Assemble the most fully developed thoughts on what might constitute a desirable community in the 21st century.

#### **4. Study development-related models for possible applicability to the areas of urban growth and the environment.**

- Evaluate the lessons learned from the one-stop permitting experience of States such as California and Massachusetts.
- Examine models of facilitated negotiation used to resolve apparently conflicting Federal goals, models of negotiated rulemaking at the Federal level, and the Corps of Engineers' partnering program, which facilitates development of contentious projects.
- Explore, in cooperation with other Federal agencies, possible models for a generic, collaborative, integrated planning process, perhaps using the Administrative Conference of the United States as a forum.

## **Conclusion**

Participants in the symposium on the relationship between environmental protection and housing and urban development discussed the impact of environmental regulation on urban growth. Issues focussed primarily on the process by which Federal laws protect the environment, particularly the fact that environmental protection is achieved largely through an uncoordinated series of Federal, State, and local permits that often have little connection to local or regional planning. Participants voiced concerns about the lack of Federal accountability; unequal distribution of costs and benefits; and the effect of regulation on urban form, development costs, and housing prices.

The group recommended that the environmental protection system be restructured in order to achieve clearly defined and prioritized goals and to incorporate the system into local and regional planning for urban and community development. Procedurally, participants voiced the need for a coordinated, tiered system of responsibility and regulation, with clear points of access for appeal and provision for judicial review.

Representatives of both development and environmental interests agreed on the need for additional research to clarify goals, help the environmental regulatory structure become more effective, and balance societal and individual objectives and burdens more equitably.

## **Notes**

1. James Carr is now senior vice president for housing research at the Fannie Mae Foundation.
2. Julie Metz died of breast cancer on October 12, 1995, at the age of 38. Prior to her death, she participated in the dedication of the Julie J. Metz Mitigation Bank in Prince William County, Virginia, which honored her for her efforts to make mitigation banking a national reality. During the dedication ceremony, Ms. Metz received a letter of commendation from Vice President Gore and awards from the U.S. Army Corps of Engineers Institute for Water Resources and the U.S. Fish and Wildlife Service.
3. U.S. Department of Housing and Urban Development. 1991. *Not in My Back Yard: Removing Barriers to Affordable Housing*. Washington, D.C.