

Fighting FEMA:
Urban Informality and
Disaster Response in
Rio Grande Valley
Colonias



TOPICS

Informality and Urban Poverty, Informal Settlements, Housing, Disaster Recovery, Poverty and Inequality, Texas

TIMEFRAME 2008-2017

LEARNING GOALS

- Evaluate FEMA's criteria for household disaster relief aid both before and after the court's decision in *LUPE*, et al. v. FEMA
- Understand the responsibility of government at all levels to provide basic services and disaster relief to informal communities
- Understand the development and history of informal housing in Rio Grande Valley colonias
- Analyze advocacy planning and community organization in support of the colonias and how other marginalized communities in the United States can seek aid for damages due to natural disasters

PRIMARY AUDIENCE

This case study is well-suited for planning practitioners and for urban planning or policy students at both the undergraduate and graduate levels working in post-disaster situations.

PREREQUISITE KNOWLEDGE

None.

SUMMARY

This case study examines the legal case *LUPE*, *et al. v. FEMA*, *B:08-cv-487 [2008]*, which discusses the issue of informal housing repairs in post-disaster situations. On July 23, 2008, Hurricane Dolly made landfall in the Rio Grande Valley of southern Texas, one of the poorest regions of the United States. In the following months, community members noticed a high rejection rate in post-disaster funding, specifically from the Federal Emergency Management Agency's (FEMA) Individuals and Households Program (IHP). This high rejection rate was particularly striking in the valley's poorest communities—the colonias—which suffer from inadequate housing, utilities, and infrastructure. As a result, organizers from the colonia-based group La Unión del Pueblo Entero (LUPE) assembled a legal team from the Texas RioGrande Legal Aid (TRLA) to contest FEMA's characterization of the community, which led to an abnormally-high rejection rate in relief funding. Ultimately, almost ten years after the disaster, LUPE finally settled their case against FEMA in August 2017. While the settlement represented an organizational victory for LUPE and its constituents, much of the damage from FEMA's inaction had already been done, and FEMA was not compelled to make important policy changes.



Home in a colonia north of Weslaco, Texas. Source: Danielle Zoe Rivera.

DEFINITION OF THE PROBLEM

On July 23, 2008, Hurricane Dolly made landfall in the Rio Grande Valley of southern Texas (valley). The region, one of the poorest in the United States, experienced widespread damage from the storm and was in need of substantial assistance.

Many of the valley's settlements are called "colonias," defined as low-income, informal, or extralegal settlements along the U.S.-Mexico border that lack adequate housing and infrastructure (Durst and Ward 2014). The term "colonia" was historically associated with uncleanliness and disease—and sometimes with racism, given their majority-Latinx populations (Hill 2003). Because of such negative connotations, many planners and policymakers recommend phasing out the term (Mukhija and Mason 2013) and instead refer to these settlements as "quasi-formal homestead subdivisions" (QFHS) (Ward et al. 2003). QFHS does specify the common characteristics of a typical colonia: Quasi-formality, or informality, is a key attribute, especially because informality does not necessarily signify illegality. Many residents of these communities own the titles to their land, even if their homes are self-built and do not conform to U.S. building codes and standards. While QFHS is gaining traction as an alternative term, in this case study, we use the term "colonia" for consistency with community usage.

Colonias are often unincorporated communities that operate off the grid, without the utilities or services provided by nearby incorporated cities. These communities grew out of necessity throughout the twentieth century, due to a lack of affordable housing and the lack of building regulations in unincorporated county lands. As the valley's population grew, service and agriculture workers arriving in the border region could not afford formal housing (Durst and Ward 2014). Until 1995, county lands were mostly unregulated and allowed for substandard development and self-building, giving rise to the colonias (Larson 2002). Developers and farmers, leveraging lax regulations in county lands, subdivided and sold farmland to the poorest



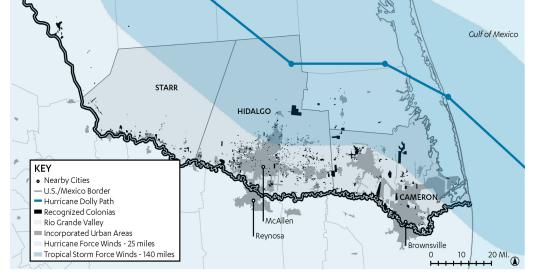
Map showing location of the Rio Grande Valley in relation to the United States and Mexico. Source: Rebecca Randolph.

residents in the valley—which, at the time, became the only reliable form of affordable housing in the region (Larson 2002). Today, the colonias continue to serve that purpose for the valley's poorest residents.

Due to their self-built and unregulated nature, colonias often lack code-compliant housing and basic utilities and services, such as paved roads or reliable electricity. Most pertinently for this study, colonias also generally lack sewer and stormwater management systems to handle both wastewater and floodwaters. This results in frequent flooding, as many of these communities were developed from agricultural land that was engineered to retain water. As a result, colonias are highly susceptible to both flooding and wind damage in even the lightest storms—and particularly ill-equipped to withstand hurricanes.



The lack of street and storm water infrastructure seen in a colonia north of Weslaco, Texas. Source: Danielle Zoe Rivera.



The path of Hurricane Dolly across the Rio Grande Valley. Source: Rebecca Randolph.

A Category 2 storm, Hurricane Dolly hit Texas's southern coast on July 23, 2008 and was declared a major disaster on July 24, 2008 ("Texas Hurricane Dolly (DR-1780) / FEMA.Gov" 2008). Wind speeds reached 160 kilometers per hour as water flooded the coastline (Allen 2008). While the eye of the hurricane struck north of the valley's colonias, Dolly's winds and rain extended up to 140 miles from its center, impacting all of them (National Hurricane Center National Oceanic and Atmospheric Administration 2008).

Many colonia homes subsequently experienced flooding for more than four months, which made it difficult and dangerous to rebuild. A member of Proyecto Azteca, a nonprofit working with Texas colonias, noted, "They [the colonias] are built so far away from the city's drainage and we have a particularly complicated drainage system in this county" (Proyecto Azteca Organizer 1 2015). Indeed, the valley is a relatively flat delta near the Gulf of Mexico that, without infrastructure for draining, holds water long after storm events (Tyx 2016). The Lower Rio Grande Valley Development Council further identifies "inadequate drainage systems, elevation and topography" as key contributors to flood risk in this region (Lower Rio Grande Valley Development Council 2011). With all of these elements in play, Hurricane Dolly thus left thousands of colonias in a precarious situation after the heavy rains.

Following Hurricane Dolly, the state of Texas did not estimate the number of flooded colonias and several news sources claimed that search teams did not identify severe flooding in the colonias, but nonprofits such as the South Texas Adult Resource and Training (START) Center found otherwise: "Hundreds of the most vulnerable area residents waded through waist-deep brown water with a few belongings wrapped in plastic bags held high in a sad caravan of Dolly's displaced" (Taylor 2016).

POSSIBLE STRATEGIES AND SOLUTIONS

Following Hurricane Dolly, colonia residents had several potential options for assistance and recovery:

- Homeowner resources, such as homeowners' insurance or household savings
- Government aid from local, state, and federal agencies and institutions
- Community aid from collective colonia-based crowdsourcing efforts
- · Collective legal action against any institution for relief aid

Impoverished colonia residents have few of their own financial resources for reconstruction, such as insurance and savings, however, they also had few options for government aid. This is because colonia homes are often in varying states of disrepair and, in some cases, land tenure is uncertain. State and local governments were largely unwilling to shoulder the burden of changes needed to formalize the colonias and continued to condemn informal building practices despite offering no affordable housing alternatives. As a result, Texas counties including Cameron or Hidalgo contain thousands of colonias but are unable to compel local cities to incorporate or take responsibility for them, a practice known as "municipal underbounding" (Mukhija and Mason 2013).

Thus, of the possible options, the best recourse for colonias' recovery was the Federal Emergency Management Agency (FEMA). However, FEMA withheld much of its available aid from colonias, compelling residents to take collective legal action.

SOLUTION AND IMPLEMENTATION

FEMA provides post-disaster aid mainly through two major programs: Public Assistance Program (PAP) for public institutions and Individuals and Households Program (IHP) for private households. PAP and IHP's "deferred maintenance" policy is central to determining eligibility for aid; that is, FEMA will not provide funding to fix damages to a structure in existence prior to a disaster. Deferred maintenance affects PAP's funding decisions when public institutions can show that "damage can be attributed to the disaster instead of lack of maintenance..." (TRLA 2014, 14). IHP, however, does not clearly define or establish criteria or procedures for determining deferred maintenance.

With approximately \$1.3 billion in total estimated damages following Hurricane Dolly (Lauer 2018, 8), FEMA designated Cameron, Hidalgo, and Willacy counties as eligible for IHP assistance ("Texas Hurricane Dolly [DR-1780] / FEMA.Gov" 2008). FEMA then followed its standard procedures and assembled a group of home inspectors to determine what damages in the valley were eligible for IHP funding. Inspectors were told to "expect sub-standard"

construction [and] deferred maintenance" and roof damages due to Hurricane Dolly's winds (TRLA 2014, 17–18), and they assessed homes according to three criteria (TRLA 2014, 15–16):

- **1. Disaster-Related Damage:** Damages are eligible for funding only when attribution to the disaster is "significant, obvious, and without question" (TRLA 2014, 19).
- **2. Home-Ownership:** Households must prove that they own the home and that it is their primary residence.
- **3. Home Habitability Repairs (HHR):** Disaster-related damages must have rendered the home "uninhabitable," or "not safe, sanitary, or fit to occupy" (TRLA 2014, 15).

While completing onsite evaluations, inspectors did not provide any reasoning behind their eligibility determinations, making later appeals of FEMA's decisions extremely difficult.

The results of the FEMA process were stark: Over half of low-income households in the Rio Grande Valley were denied IHP funding (TRLA 2008a, 1), an estimated total of 10,000–15,000 households (TRLA 2008a, 5). FEMA admitted that the IHP denial rate for Hurricane Dolly was much higher than usual, but stated that was due to "the faulty building of the house, and not the storm" (TRLA 2008a, 5) and alluded to the issue of deferred maintenance. However, colonia residents contended that the criteria for determining deferred maintenance were unclear and unevenly enforced in a manner biased against low-income households (TRLA 2008a, 1–3). Two nonprofit organizations then fielded multiple complaints from colonia households regarding their treatment from FEMA:

- Texas RioGrande Legal Aid (TRLA): Founded in 1970, TRLA provides legal support for low-income farmworkers (TRLA Lawyer 1 2015). In recent years, they have expanded services to provide increased support for low-income households.
- La Unión Del Pueblo Entero (LUPE): Founded by César Chávez and Dolores Huerta in 1989, LUPE is a colonia-based and funded grassroots organization that protects its constituents from unjust government policies, generally stemming from border proximity and race (LUPE Organizer 1 2015; LUPE Organizer 2 2015).

Together, TRLA and LUPE filed a civil complaint and preliminary injunction against FEMA on behalf of eleven low-income households on November 20, 2008 (TRLA 2008a, 31):

The high repair denial rate in the Rio Grande Valley results from FEMA's unpublished and vague rule requiring the rejection of housing repair applications in cases of substandard housing—a rule that institutionalizes economic discrimination (TRLA 2008b, 2).

This was a serious accusation: FEMA is required, per the 1988 Stafford Act, to not discriminate against applicants (Stafford Disaster Relief and Emergency Assistance Act 42 U.S.C. § 5121 et

seq (1988)). The complaint alleges that this discrimination is the result of the unclear criteria used in determining IHP eligibility—namely FEMA's deferred maintenance policy, which is biased against households that are too poor to meet FEMA's expected levels of household maintenance (TRLA 2008a, 1–2; 2008b, 1–2). As the plaintiffs state in the preliminary injunction:

FEMA's deferred-maintenance policy raises important concerns under 42 U.S.C. §5151(a). Foremost is economic discrimination. Poor people are least likely to be able to afford to maintain their homes, and poor people are most likely to live in areas of substandard housing, including unincorporated subdivisions called colonias that are scattered throughout the Rio Grande Valley (TRLA 2008b, 18).

Furthermore, the complaint alleged that FEMA contradicted its congressional mandate to "prescribe rules and regulations to carry out [housing repair assistance under 42 U.S.C. § 5174(c)(2)], including criteria, standards, and procedures for determining eligibility for assistance" (TRLA 2008a, 3), as the preliminary injunction states:

Plaintiffs only ask this Court to require FEMA to do what agencies routinely do: publish ascertainable standards, apply those standards equitably and impartially to each applicant, and notify applicants of the facts and legal basis upon which the agency's decisions rest (TRLA 2008b, 22).

Ultimately, the basis of the lawsuit revolved around two questions (Southern District Court of Texas 2009, 2):

- What are FEMA's criteria for determining "deferred maintenance" in IHP?
- Are deferred maintenance criteria so unclear that they "institutionalize economic discrimination" on the basis of perceived housing disrepair?

Once the complaint and preliminary injunction were filed, FEMA unsuccessfully attempted to get the case dismissed on the grounds of "sovereign immunity" (Southern District Court of Texas 2009, 3–4); the court determined, through other legal precedent and discretion, that FEMA can be sued in this instance. The district judge for Southern Texas then granted the preliminary injunction on May 13, 2009. FEMA quickly appealed the order on September 15, 2009, and the U.S. Court of Appeals, Fifth Circuit threw out the preliminary injunction on August 4, 2010, remanding the complaint to the District Court.

Ultimately, the plaintiffs argued that FEMA was "parroting regulations" from the Stafford Act in a way that rendered the deferred maintenance policy inconsistent and unenforceable (TRLA 2008b, 13). They further argued that such an unclear policy ultimately led to economic

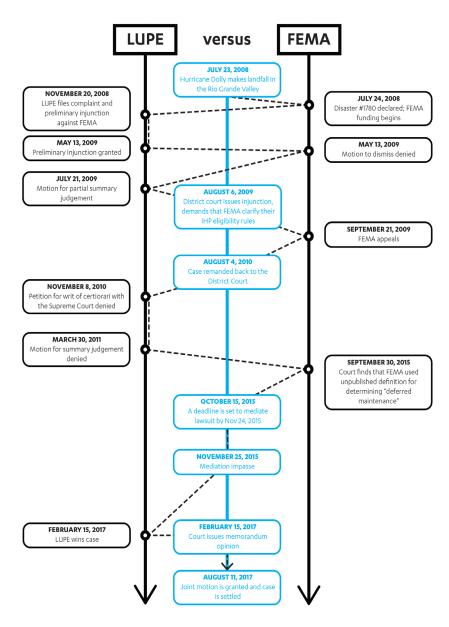
discrimination against low-income communities—particularly colonias—across the Rio Grande Valley following Hurricane Dolly (TRLA 2008b, 18). In response, defendants argued that they were not parroting regulations and did follow their congressional mandate as set out in the Stafford Act.

RESULTS

On September 30, 2015, the Southern District Court of Texas in Brownsville made a partial summary judgement in favor of the plaintiffs, finding FEMA's deferred maintenance policy, in fact, unpublished and unclear (Southern District Court of Texas 2017, 2–3). As the court stated, the deferred maintenance policy "substantively altered the weight and sufficiency of evidence of damage and degree of causation that had to be shown to prove that damage was disaster-related and thus potentially remunerable under FEMA's regulations" (Southern District Court of Texas 2017, 2). However, it declined to make any ruling on other policies involved in the lawsuit, such as LUPE's economic discrimination claim.

This ruling meant that FEMA was now required to reconsider all the IHP applications listed as plaintiffs on the lawsuit, which had grown from the initial eleven to thirty (Southern District Court of Texas 2009). Further complicating FEMA's predicament, the court later ruled on February 15, 2017, following the 2015 partial summary judgement, that LUPE had associational standing with those affected by FEMA's deferred maintenance policy, which greatly increased the number of households that could potentially be covered under the ruling. In light of this development, FEMA agreed to provide a cash settlement for the households specifically listed in the lawsuit in lieu of reconsidering IHP applications. LUPE agreed, and the case was subsequently settled on June 21, 2017.

While Hurricane Dolly revealed ongoing, unaddressed injustices in the Rio Grande Valley, other low-income communities are now looking to the valley's experiences with federal disaster-recovery funding for lessons and insights as they rebuild after disasters. FEMA's process needs to be examined and revised to provide more equitable aid for residents in future recoveries.



Timeline showing major events in *LUPE, et al. v. FEMA, B:08-cv-487 (2008),* from Hurricane Dolly making landfall to the resolution of the legal case. Source: Bradleigh Jenkins and Danielle Zoe Rivera.

ANALYSIS AND EVALUATION

Since losing its case, FEMA does not appear to have altered its deferred maintenance policies in any significant way. This was made apparent by organizations like Texas Appleseed and Texas Housers working in low-income Texas communities experiencing similar post-disaster issues from more recent hurricanes (Henneberger 2010; Sloan and Fowler 2015). In their analyses of disaster aid following Hurricanes Dolly and Ike, Texas Housers found that FEMA continues to use its deferred maintenance policy to deny low-income communities aid at higher rates than more affluent communities (Henneberger 2010). This policy's impact was also apparent in Puerto Rico following Hurricane Maria, given the island's high rates of both informal building construction and FEMA IHP rejections. However, FEMA continues to assert that there is no mandate forcing its clarification of the deferred maintenance policies beyond the Stafford Act.

Despite this, the success of *LUPE*, *et al. v. FEMA*, *B:08-cv-487 (2008)* has positively contributed to the colonias in at least two ways: First, it generated support for colonia-based housing improvements by exposing the hazards threatening valley colonias. Second, it helped mobilize colonia residents on issues of flooding and stormwater infrastructure, which has subsequently caused governmental agencies including the Texas Water Development Board (TWDB) to act. Colonia organizers and residents continue to celebrate their success in suing FEMA and largely view the results of the case as empowering.

Hurricane Dolly's aftermath also rekindled activism throughout the Rio Grande Valley, particularly in the colonias. Multiple initiatives, including the Equal Voice Network (EVN) and the Land Use Colonia Housing Action (LUCHA), were launched after or around the time of the hurricane and fundamentally changed colonias' relationships with the state of Texas and with the federal government. Colonia residents in the Rio Grande Valley and their representative organizations like LUPE have gone on to lobby for policy changes in Texas. Their campaigns have most notably targeted: state law allowing counties to tax for, build, and maintain streetlights; support for Deferred Action for Childhood Arrivals (DACA) participants; and the current Rapido proposal to inform how post-disaster housing reconstruction occurs in Texas.

LUPE, et al. v. FEMA, B:08-cv-487 (2008) took nearly ten years to resolve, however, and as a result much of the damage had already been done to the colonias by the time the case was finally settled. Many families were displaced due to the long wait for IHP funding—a phenomenon is increasingly referred to as "disaster gentrification," or the leveraging of acute shocks like hurricanes to expedite displacement of low-income communities. In other words, although colonia residents were left with no option other than suing FEMA, the lengthy process restricted the number of beneficiaries. This can be seen in the complaint itself, filed only four months after Hurricane Dolly made landfall, which describes a household already displaced to lowa (TRLA 2008a, 13–15). Many of the other households in the original complaint were trapped in mold-ridden homes without the financial capacity to move or to improve their housing, and there were later reports of serious health issues, such as bronchitis and asthma. Ultimately, despite LUPE's legal victory, the issue of systemic marginalization in FEMA's deferred maintenance policy remains unaddressed. Given that, FEMA also seems to be consistently unprepared to assess home damages in low-income communities where households may not have the means to keep up with expensive and extensive housing repairs.



Stormwater management drains being installed at an intersection outside of Weslaco, Texas. Source: Danielle Zoe Rivera.

LESSONS LEARNED

From *LUPE, et al. v. FEMA, B:08-cv-487 (2008)*, two major lessons emerge: First, FEMA needs to change its deferred maintenance policy in IHP and establish clear criteria and procedures for identifying deferred maintenance. The issues experienced by valley colonias are not an isolated incident; low-income households across the United States struggle to keep up with home repairs. Lessons from the recovery from one disaster are also not being applied to the next, perpetuating disinvestment and disaster gentrification in low-income communities, as Hurricanes Harvey (in Houston) and Maria (in Puerto Rico) show.

Second, in lieu of changes to FEMA's policies and practices, advocacy planning and community organization can play a major role in post-disaster reconstruction by obtaining funding for the community, as LUPE and pro bono lawyers from TRLA did for the colonias. Though the final settlement amount was limited and did not cover all affected households, their effort sparked hope for other low-income communities by establishing legal precedent for other similar movements and lawsuits.

Unanswered questions posed by *LUPE*, et al. v. FEMA, B:08-cv-487 (2008) continue to appear in other communities with high concentrations of low-income households—the population most vulnerable to disaster. Their struggle offers a stark assessment of how FEMA handles tenuous housing conditions and situations after major disasters.

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PHOTO CREDITS

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