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# Preliminary Assessment of Client Interest in and Needs of the New England Environmental Finance Center

New England Environmental Finance Center

University of Southern Maine

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# **Preliminary Assessment of Client Interest in and Needs of the New England Environmental Finance Center**

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December 1, 2000

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The New England Environmental Finance Center (NE/EFC) has been conceived as a knowledge-based clearinghouse, training, and change-agent program aimed at helping EPA's constituencies find financially successful approaches to environmental improvements. The NE/EFC will develop approaches to needs of particular priority in New England and potentially useful throughout the nation; share such approaches through the EFC national network; and help make tools from that network accessible throughout New England. In 1999 we began exploring with potential users how this ninth of the nation's EFCs might best address the region's needs. The assessment continued through the Muskie School's EFC proposal to EPA Region I in 1999, its designation as NE/EFC in Spring 2000, and this Fall 2000 planning phase for fiscal year 2001 initiation.

This report summarizes what has been learned and suggests a multi-year set of work tasks aimed at different needs. Sources of information for this analysis include detailed interviews with representatives of key clientele in the Region I states, discussions at professional meetings, and ongoing conversations with local governments, NGOs, state agencies, and with EPA Region I managers. The report sets forth the context, approach, and data sources for our investigation; our major findings; and their implications for the NE/EFC's immediate and longer-term work programs.

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## **CONTEXT FOR ASSESSMENT**

The Muskie School and the Casco Bay National Estuary Project (hosted at the School) began in Fall 1999 to explore the potential mission that a Region 1 EFC might fill. An initial focus for the New England EFC has been the emerging importance throughout the region of innovative approaches to land conservation, habitat preservation, and growth guidance that move beyond public regulation to include financial incentives and partnerships between the public, non-profit, and private sectors.

New England has a traditionally strong and increasingly innovative community of non-profit organizations, such as land trusts, involved in funding land acquisition, protection, and long-term stewardship. For example, in 1985 Maine had less than a dozen land trusts of all kinds; today there are 82, with the most recent formed in Buxton just months ago. In Connecticut, the 20-year-old Land Trust Service Bureau (a statewide liability insurance pool) reports that trusts have grown from 70 in 1980 to more than 115 today. (Bowers, 2000). At the same time, new public-private collaborations have emerged to fund and guide "co-development" projects combining housing, open space preservation, and ecological systems protection.

Examples of the newly emerging approaches include the 1999 subdivision developed by southern Maine builder Ron Smith which involved dedication of open space to a local land trust for perpetual stewardship, in order to meet the regulation and design standards of the local government jurisdiction. Another is the Essex (CT) Land Trust partnering with the Town of Essex in 1999 to use Town funds to acquire land to be held by the Land Trust. Still another is the Bear Paw Regional Greenways Trust in southeastern New Hampshire, created when two towns saw a need to link their separate small state parks through a cooperative open space network that now involves seven town governments working together.

These projects link the non-profit conservation community to local governments and private land developers to address compelling fiscal, environmental, and growth management concerns. Many trusts are small, and all are concerned with protecting open space, but not necessarily with addressing these wider environmental issues, nor with using innovative opportunities to pay for environmental improvements. Their programs are usually developed only in reaction to specific land development "crises," and are rarely based on thorough assessments of a community's conservation needs and opportunities. Opportunities are often lost for lack of systematic planning and shared knowledge among possible cooperators, including local government and private developers.

## **The EFC Mission**

Why are these developments relevant to a New England EFC? The express mission of the national experiment with EFCs is to support creation of sustainable environmental management systems in both the public and private sectors (Office of the Comptroller, USEPA, 2000). The EFCs' unique objective is to respond to the need to creatively and cooperatively fund environmental improvements. The EFC program further recognizes that "paying for environmental protection ... will continue to be primarily a responsibility of local governments and the private sector." This underscores the needs for making effective knowledge available at the community level through institutions that can link federal, state, and local perspectives, and convene private and public interests. For this and other reasons, the first and all succeeding EFCs have been established at public universities.

Thus, the emergence in New England of increased private and non-profit funding of key land protection actions, and of collaborations between the private and public sectors suggested to us in 1999 that a New England EFC might contribute greatly by having at least one focus on the support of these efforts and the transfer of appropriate tools and lessons both within the region and to other regions through the national EFC Network.

### **New England Constraints and Opportunities**

The historically small size and home rule traditions of local governments in New England, combined with lack of regional and county governments and the supremacy in the landscape of private property, have created frustrations for those concerned about open space, growth management, and environmental protection. Local governments with the most immediate development pressures since the region's 1993 economic upturn have revived the growth management experiments of the 1980s, but are limited by the private property rights that were frozen in blanket, large-lot zoning of formerly rural areas. The result is well-exemplified by Leominster's (MA)) situation this year, when it was forced to buy the last farm in town to preserve a key piece of open space, the farm where Johnny Appleseed grew up.

Historically, the New England states also have the nation's longest continuous experience with private land conservation, with some organizations' activities measured in centuries, such as the Society for the Preservation of New Hampshire Forests and the Massachusetts Trustees of Reservations. While there has been remarkable growth in local land trusts in recent years, some leaders of this community see compelling needs for innovation. Jack Aley, director of a highly successful local land trust in Maine, notes:

*"... the time has come to develop new techniques ... For example, in 1991, (our land trust) preserved 344 acres through conservation easements. Since then it has executed*

*only one. Major landowners may agree with our mission, but few can afford or are willing to donate easements or title. (Aley, 2000).*

New directions he suggests include more creative partnerships, stable revolving funds to seize protection opportunities, and direct town funding to save land in accordance with strategic growth objectives. Some of the present report's examples, noted earlier, go even further toward new funding and partnership approaches. Both local conservation organizations and local governments tend to learn from their own experience, but not to scan the environment for new tools, however. This means the pace of changing tools and public-private collaborations has been much slower than the recent boom in non-profit conservation organizations.

### **Assessment Methods**

We have investigated how different New England states' private land protection communities, university Cooperative Extension, and other outreach programs are responding to the needs discussed above, including technical assistance to the conservation community and the role of state funding for local land acquisition. Extensive interviews were held with key actors in New Hampshire, Connecticut, and Maine, as a sample of the region's needs (see Table 1, attached). Our focus in these states was on the major organizations that lead in providing assistance to new and emerging non-profit environmental protection efforts, as well as to smaller, local governments. The assessment also refers to information collected from EPA Region I program managers on their view of needs for linking tools to local actions on environmental protection; and to information from our ongoing relationships with state agencies, regional planning agencies, and the Casco Bay National Estuary Project, among others. We conclude with observations about how we may address some of these needs through the NE/ EFC over a multi-year period.

Interviews in three states (Maine, New Hampshire, and Connecticut) were held with the organizations which are currently most active and innovative in statewide and regional efforts to help the non-profit conservation community or local governments develop capacity for land, habitat, and ecosystem protection. While we did not focus on the water quality and ecosystem protection projects of the state environmental protection agencies or the US Fish and Wildlife Service, we recognize that programs such as the Section 319-funded water quality and ecological restoration projects are important to the needs and issues here. Future opportunities for linking these water quality projects more closely to local conservation and growth management efforts are a relevant goal.

The most widely recognized issues in local level growth management and open space protection in New England include the small size and fragmented system of local

town and municipal governments, often with no or limited professional staff; the lack of regional institutions with authority to address boundary-spanning ecological, economic, and transportation issues; and the supremacy of many private, often small property holdings in the landscape. These issues were echoed repeatedly in interviews in each state.

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## **SUMMARY OF MAJOR FINDINGS**

Four major findings emerge from comparing the three states, and what we learned about their needs:

- (1) The potential for partnerships between non-profit conservation organizations and state institutions in training and assistance to local communities;
- (2) The potential for creative partnerships among the private, non-profit, and public sectors to protect important public values on the land, through a more strategic approach to land conservation;
- (3) The unrealized strategic leveraging power of growing state land protection monies if appropriate local partnerships are realized; and
- (4) The desire to link EPA's assistance and resources to local environmental needs and actions.

In each of New Hampshire and Connecticut, one conservation organization has emerged over time to be both a dominant statewide owner of fee and partial fee lands and, more recently, the leader in assisting the new local land trusts which have experienced dramatic growth in numbers and location. They are the Society for the Protection of New Hampshire Forests (NH Forest Society), and the Connecticut Chapter of the Nature Conservancy (CT TNC). In Maine, the Maine Coast Heritage Trust (MCHT) plays a similar role, but it expanded into assisting local trusts statewide from its own beginnings as a regional land trust .

Technical assistance and training for local governments, particularly in rural and rapidly suburbanizing small town areas, has a long tradition of involvement by land grant university-based Cooperative Extension in both New Hampshire and Connecticut. There is no such institutional tradition in Maine, where the State Planning Office (SPO) funds local assistance services of varying content and quality through regional planning agencies. The contrast is important because, in New Hampshire and Connecticut, Extension has begun to collaborate with the non-profit conservation sector to develop joint training efforts for local land trusts, and to promote greater collaboration between private conservation and local government actors.

Maine has had a generous statewide bond issue -- the Land for Maine's Future Program (LMF) -- throughout the 1990s which has allowed state agencies to sponsor nominated major land purchases for conservation and heritage/recreation purposes. LMF has been refunded for another decade by a voter-approved statewide bond issue of \$10 million. Connecticut has recently enacted an "Open Space and Watershed Land Acquisition Grant Program" for local organizations which is administered by its State Environmental Agency (CT DEP). New Hampshire this year appropriated reduced funding (\$3 million rather than \$10 million) for one year only of a multi-year open space acquisition grant program by local governments, after lacking any such funding since 1993. The new Land Conservation & Heritage Investment Program (LCHIP) has been long lobbied-for by New Hampshire's conservation community.

The organizations in all three states (excepting the Maine regional agencies but including the Maine LMF staff, itself) are involved in efforts to provide some assistance to applicants for state-funded land acquisition. In Maine, a state agency must "sponsor" each local application of any kind.

In each state we tried to answer three questions with these key organizations:

- (1) What are the key successes and failures, to be studied and replicated elsewhere?
- (2) Which directions appear most promising and needed for innovation?
- (3) What would be the value of involvement in a region-wide, multi-state EFC advisory network?

Additional information has also come from two specific sources. The first is a charette on alternative wastewater treatment finance conducted jointly (with the Region III EFC) in the Hyannis Park section of Yarmouth (MA) in September 2000 (see Case Study attached). The second is a meeting with key Region I staff responsible for a variety of programs, also held in September 2000.

Table 1 (p.12) summarizes at a glance our major findings about expressed needs.

Common among them are the needs to:

1. promote more technical support for small, non-profit conservation efforts and small town planning, with an emphasis on helping public, non-profit, and private actors link their efforts to achieve multiple goals;
2. make the economic and fiscal case for land protection, and find more multi-layered strategies for paying for it;
3. Link traditional open space/aesthetic/heritage land protection to environmental protection needs (e.g. water quality, ecosystem protection), especially through new forms of partnerships among the different sectors.

Our analysis indicates that, from the EFC's perspective, the critical needs appear to be, first, to gather knowledge about innovative solutions to local problems and, second, to foster creative partnerships and collaborations through use of this knowledge.

In addition to these learnings from the state visits, the Hyannis Park wastewater system charette and meetings with EPA Region I managers revealed additional concerns. The case needs to be made for creative public-private funding of alternatives to individual, on-site septic systems, where serious threats exist to environmental quality. There is need for local capacity-building in areas such as managing Brownfields revolving fund accounts. There is concern at EPA about how communities and states will implement revised stormwater rules. Finally, there is a perceived need to find the best way for the federal level to assist communities with "smart growth."

Although the totality of these needs seem wide-ranging and disparate, our inquiries lead us to propose that most of the expressed needs are more closely related than is apparent from a simple inventory. Historically, there have existed wide gulfs between the separate efforts. Traditionally, land trusts have focused on preservation, disconnected from other, complementary land use needs, such as fostering the best locations for where people will live, businesses will locate, and infrastructure will be built to avoid degrading resources. New England towns, for their part, have primarily attempted to limit property rights with simple zoning and fostered the piecemeal conversion of the landscape until rising land values make public or non-profit action to purchase the remaining large open space a dire necessity.

Finally, environmental protection programs at the state and federal level have focused on media-specific (water, air, toxics) and functional (e.g., landfill) problems, and largely ignored the question of local guidance of overall growth. The absence to now of strong state mandates such as Oregon's urban growth boundaries (which poorly fit New England's situation culturally, politically, or geographically) and of sufficiently rapid urbanization to support partial market solutions like Transferable Development Rights, have frustrated efforts to find a "magic bullet" solution to the slower but inexorable form of "sprawl" we see in New England.

*"In New Hampshire, even if \$10 million a year were funded (as NH Legislature was asked to appropriate) it would only protect 200,000 to at most 1 million acres through traditional methods over a period of years; but there's then still LOTS of land not protected."*

*"Yes, and that's why we need people to think about 'open-space-oriented development'-but it hasn't worked on the ground yet..."*



*Sarah Thorne, Research Director and Paul Doscher, Director of Land Conservation, the NH Forest Society*

With the exceptions of the controversy over landscape-scale issues like the North Woods of New England, and specific biological resource preservation issues such as the Atlantic Salmon ESA listing, the approaches we have found and describe here share certain characteristics vital to the New England setting:

1. Negotiated or partnered collaborations among separate institutions;
2. "Proving" the feasibility of approaches in each locale through negotiation and brokering among each set of actors, and capacity-building for these actors through training and good practice models;
3. Acknowledging but challenging the historic small scale of local authorities in the New England landscape, rather than trying to work around it; and
4. Developing land conservation actions that are forward looking and strategic, rather than crisis driven.

A straightforward example of this process at work is "co-development." We find examples of "greenfield" developers, land trusts, and town governments entering into agreements to preserve land as mitigation for town approval, where several private and public funding sources are mixed, and multiple goals (housing, open space, fiscal feasibility of new design patterns) are beginning to be met. But success has to be earned in every place where action takes place. For example, innovative Maine developer Ron Smith was most recently unable to donate open space to a local group opposed to a project, in order to meet legitimate concerns but gain consent. There has been no basis established for a collaborative agreement.

An important evolution of non-profit conservation/local government collaboration is occurring between land trusts and towns, who have not always or even frequently worked together or coordinated goals, despite their shared locale and size. This is illustrated in a recent letter to Connecticut's DEP from the Town of Essex to support state funding of a coordinated purchase by the Essex Land Trust, which Connecticut Extension personnel see as a bellwether of needed directions:

*"My fellow Selectmen join me in urging DEP's granting of state funding to the Essex Land Conservation Trust for acquisition of this environmentally sensitive property.... (An) adjacent property will also be purchased through a collaborative effort of private fundraising and public open space tax dollars (and) the Essex Land Trust.... (Because of the state DEP Open Space Initiative) open space sinking funds are being established in municipal budgets, open space committees formed to prioritize and identify potential properties, and the awareness of the economic benefits to acquiring*

*open space (is) high.... The Essex Land Trust (is) more proactive and creative in devising ways to fund (properties) than ever in its 31-year existence."*

*-- Peter B. Webster,  
First Selectman*

Another example is the development of the Bear Paw Regional Greenway Trust in rapidly suburbanizing southern New Hampshire. Residents of two towns saw their individual state parks at risk, separated by an intervening town and subject to how other neighboring towns may respond to development pressures in the future. The result of defining this problem as a shared one -- how to connect and expand an open space system, not just a state park -- has produced one of the few locally-initiated regional approaches in all New England, a seven-town land trust.

Organizations that have been working at a statewide level view such local and regional innovations as essential and even urgent; but they also have a realistic view of the obstacles to promoting such innovation. The tendency of conservationists to focus primarily on aesthetic and recreational open space issues, or for local planning officials to put low apparent priority on environmental consequences, is known and remarked upon; but it may be a distraction from the real need, according to Chester (Chet) Arnold, which is effective partnering among previously independent (and often opposed) actors.

Arnold's efforts to create Project NEMO, first at the University of Connecticut Cooperative Extension Service, have had national benefits. Arnold points out that "the lack of information at the local level about complementary environmental needs and benefits simply fuels the emphasis on short-term economic gain. There is no local information to look at natural capital with all its tangible and intangible factors." Project NEMO tackled this problem in one area -- nonpoint pollution (NPS) -- by linking watershed planning knowledge with the land use experiences of local officials, to help them develop their own commitment and strategies for linking NPS, land use, and other goals in real actions. This learning takes effort, however. Talking about the similar evolution of private conservation action, Arnold says, "even in my own land trust, there's reluctance to try anything other than fee simple land acquisition!" Creative financing is pushing the envelope of local knowledge; but "simply handing people a technical model is the most un-NEMO-like and ineffective approach," says Arnold, if there is no bringing together of the problem-solvers to learn and change behavior.

Nathan Frohling, Tidelands Director of the TNC-CT, agrees with this assessment, and explains it further in terms of the role land trusts and the other partners they work with may need to develop:

*"How do you tackle the diversity of issues in a community? The watershed has been useful in New England -- small enough to get 2 to 3 towns together, large enough to begin to deal with regional and ecosystem issues. Now we're trying to do this in our ecoregional planning projects like the Tidelands.... Land acquisition is only one part of the strategy [which needs to include] good planning and economic development -- the creation of 'compatible local economic development' efforts... The two changes I see in the TNC are, first, our large-scale planning for biodiversity now, and a move to community-based conservation -- not just buying land but engaging the communities in which we are working -- not just to support our projects, but in a process of self-determination which leads to a sustainable future for all three legs of the stool. We need to approach projects with a greater sense of consensus about the vision a community has of itself that affects open space."*

Similar insights emerge from the counterpart organizations in New Hampshire. UNH Extension personnel began a program to provide training in small town natural resource inventories as a step to encourage learning about the environmental management dimension of their situations. Extension also produced a simple analysis of the economic value of open space, which has been applied to a number of towns, again not as a definitive expert tool but as a capacity-developing tool. At the same time, the New Hampshire Forest Society has become involved in the need for greater assistance to conservation trusts and action investors. The organization has produced the most useful technical analysis of land conversion trends in the state, and acted as the convener of a statewide nonpartisan, multi-interest Smart Growth Roundtable to "enhance the State Planning Office' Growth Management Study."

The Forest Society's perspective as an innovator echoes that from interviews in other states. There is a need for examples of how small jurisdictions can manage land acquisition funds, innovative land use regulations, and fiscal tools like impact fees.

*"In trying to put together an organization (to address these needs), we find that lots of organizations say that sprawl is at the top of their agenda; but how can we devise something that will help us work together, not just legislatively, but on the ground?"*

The Forest Society and Cooperative Extension have very recently begun discussions about how to collaborate on technical assistance to towns and private organizations, trying to make use of the state's first legislative funding of open space and watershed lands acquisition in many years. This in itself is an innovation.

Among the failures that organizations in these states mentioned are the simple lack of funding and concern that federal funding tied to traditional media programs are often inaccessible for innovations; a need to engage municipal and town governments more closely; to increase education of disparate actors as a precondition to innovations; and

a need for such new approaches as co-development, because there will never be enough money to buy all the land needed for environmental protection at the local or watershed scale.

## **Other Needs**

The needs brought to light by the Hyannis Park wastewater finance charette and in conversation with EPA program managers (see Table 1) are different in content, but similar in terms of the capacity-building needs throughout Region I to promote innovation. In the Hyannis Park case, the actors brought together were not ready to consider innovative solutions to a problem because they were not yet informed adequately about either the environmental problem or the full range of interests that might be engaged (Barringer, 2000). Yet the charette itself changed the setting and is an actual step toward addressing the problem. EPA programmatic concerns about other areas such as the implementation of revised national stormwater regulation standards are, we believe, going to require similar strategies to promote learning at each locale's level. Stormwater management in much of the New England landscape is necessarily linked to open space, habitat protection, and land use issues, especially because most non-commercial and even many commercial projects do not occur at a sufficiently large scale spatially or financially to make use of the best on-site practices.

Another application for what we learned is in the "smart growth" arena. Traditional private conservation investments and town responsibilities for allocating land and infrastructure for growth and open space have been disconnected organizationally, as well as in terms of not working on common or complementary goals. Examples of co-development, the blending of public and private funds for land protection, and growth of awareness of the environmental quality dimensions of open space, all reflect responses to a systematic planning need. Successful smart growth is paid for economically in part by integrating development and environmental conservation and quality needs, not divorcing them, as has been the historical practice in many, if not most places.

Successful implementation, this appraisal suggests, will need a collaborative, learning environment that goes beyond the boundaries of a single state level implementation agency, and influences the community level as well. Maine DEP's sponsorship with Region I of a Project NEMO demonstration reflects the Maine water program's very proactive concern about these needs, to cite but one example.

Finally, we probed views during our state visits of whether involvement in the regional EFC would be viewed as valuable (for example, in an advisory and user network), and under what conditions the value-added would be optimized. Among the

most important points we heard was that the EFC should focus on well-targeted niches rather than diluting efforts; and that an organization that helps EPA better "hear" from a broad set of state and local actors could be very valuable. In some states, the organizations we visited expressed the view that they have the ability to meet capacity-building needs but no resources to do it; while in others we heard that the sharing of successful innovations and the confidence this can build is needed. These are the "give me the money" versus the "give me the success story" sides of what is by no means a clear-cut situation. There was consensus, however, that lessons about innovations of the kind mentioned here do not get shared outside state borders at the local level very much, even while the NE states share many similar situations and can learn much from transfers.

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## **IMPLICATIONS FOR WORK PROGRAM**

As we understand it, EFC start-up funding is aimed specifically at capacity-building of the region-wide mission of the Center over the long term, and not merely at specific projects and products. Capacity-building tasks for the NE/EFC may best be seen, then, in the context of a three-to-five year work program that moves us stepwise towards our goals and vision for where we want the NE/EFC to be at that time. These goals include developing the knowledge base and network of collaborators for region-wide strategic land conservation innovations at the local level; and, second, extending such collaborations to the support of specific Region I program needs such as stormwater, watershed, and brownfields management; and, third, establishing diverse funding sources for the EFC mission, goals, programs, and projects.

In this strategic context, our findings suggest the following as a possible, initial work agenda for the NE/EFC in its first two years of EPA funding:

1. New approaches to land conservation in New England. A series of workshops, to be held in more than one location in the region, to look at:
  - Innovative financing approaches
  - Strategic conservation successes
  - Land conservation as a tool for environmental quality management
  - Co-development and innovative wastewater treatment
  - Matching state and local priorities

Each workshop would be presented by people whom we identify as having good stories (successes or failures) to tell; each would make use of a set of reference materials that we will prepare; and we would use the workshops to build a further set

of materials that would form the basis of a future, ongoing set of training programs. We could seek foundation money to produce videotapes of the workshops and videotape-cd presentations of the material.

2. Regional conference on strategic land conservation. Building on the series of workshops proposed in 1. above, funding will be sought to convene a New England-wide conference to promulgate findings from the workshops, and the idea of "strategic land conservation" based upon the integration and application of sound planning, finance, and ecosystem principles at the local level.

3. Inventory of conservation lands in New England. Develop a regional inventory, from existing sources, of protected conservation lands, starting with a sample sub-state region as a step towards:

- a New England-wide data base
- Demonstrating the economic costs and benefits of land protection.

The inventory, beginning with an assessment of available data and a long-term plan to create the regional database, would likewise be the basis for further grant applications.

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**Table 1: Summary of NE/EFC Client Needs Appraisal**

State	Organizations	Concerns & Needs
Connecticut	The Nature Conservancy-Connecticut; U. Conn. Cooperative Extension and Project NEMO	Changing roles of private land protection; local technical assistance needs; linking open space and environmental management needs; trends in state funding; problems of landscape scale conservation (priority eco-regions); need for much more collaboration with local governments on multi-objective growth management
New Hampshire	UNH Cooperative Extension; Society for the Protection of New Hampshire's Forests; regional agencies.	Linking open space and environmental management needs; regional partnerships, public-private partnerships; limits of state funding; making the case for economic and fiscal benefits of conservation; new training/outreach approaches; need for collaboration with local governments on multi-objective growth management
Maine	Maine Coast Heritage Trust; Maine Land Trust Network; regional agencies; state agencies (DEP, SPO);	Making the economic and fiscal case for conservation benefits; promoting innovative private-public

	federal special programs (USFWS Gulf Maine Office; Casco Bay National Estuary Project); Land trusts; regional planning agencies	partnerships; problems of landscape scale conservation (e.g., North Woods)
Massachusetts/Cape Cod area	Participants in Yarmouth (Hyannis Park) charette conducted with Region III EFC at U. Maryland.	Need for alternative wastewater treatment systems for the rural and village landscape in New England, to ensure ecological systems protection (marine water quality in this case); problem of financing individuals' changeovers from on-site waste disposal; lack of public awareness of environmental impacts of "rural" infrastructure for suburban settlement; need for the NGO/conservation community to gain local government partners in addressing such problems.
EPA Region I Pgm Managers	Safe Drinking Water Program; State Revolving Loan Fund & Capacity-Building Program; Brownfields Program; Smart Growth Initiative; Regional Reps.	Local capacity development to utilize small, alternative wastewater treatment systems; local capacity development for fiscal management of Brownfields revolving funds; delivering "smart growth" tools to local level; local capacity development to implement "Stormwater II" regs.



