

**NATIONAL PROFILE  
OF SECTION 208  
AREAWIDE MANAGEMENT  
PLANNING AGENCIES**

**JULY 1975**



**ENVIRONMENTAL PROTECTION AGENCY**

**Washington, D.C. 20460**

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**PROJECT DIRECTOR — MICHAEL L. FRANKEL**  
**PROJECT STAFF —** **CONSTANCE L. CASTLE**  
**CHERYL J. DINNEEN**  
**PATRICIA C. HIGGINS**  
**CAROLYN M. HOCK**  
**JEAN A. LYNCH**  
**DAVID H. MECKLER**  
**JANE M. NOWAK**  
**ADAM POE**  
**STEPHEN G. PRESSMAN**

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ENVIRONMENTAL PROTECTION AGENCY**

## PREFACE

This report summarizes a national profile of local planning agencies designated under Section 208 of the Federal Water Pollution Control Act Amendments of 1972. The project was conducted by Centaur Management Consultants, Inc. during July and August of 1975 under an EPA contract (No. 68-01-3195) to the Areawide Management Branch.

The nine-member project staff was recruited from the urban and regional planning schools of George Washington University, Georgia Institute of Technology, Harvard University, Johns Hopkins University, Stanford University and the University of North Carolina at Chapel Hill.

The national profile prepared by this staff represents a literature review of grant applications and designation packages from all 149 designated planning agencies and personal interviews with 136 local planning agencies. However, the project was not a research effort. The facts and figures gathered through the interviews were not verified. Information in the designation packages and grant applications was not always complete, and often supplemented with an "estimate" by the interviewee. Consequently, the data is most useful as a general profile of 208 agencies and their activities. It should be viewed as the local 208 staffs' best approximation of information at this time.

The project staff appreciates the guidance and support provided by the Water Planning Division of EPA and the time and advice given by the EPA Regional 208 coordinators. The staff also thanks the local 208 agency staffs who gave their time for the interviews. Finally, the staff extends its gratitude to Ken Regelson for his tireless efforts in seeing to the technical and administrative day-to-day needs of the project staff.

Michael L. Frankel  
Project Director

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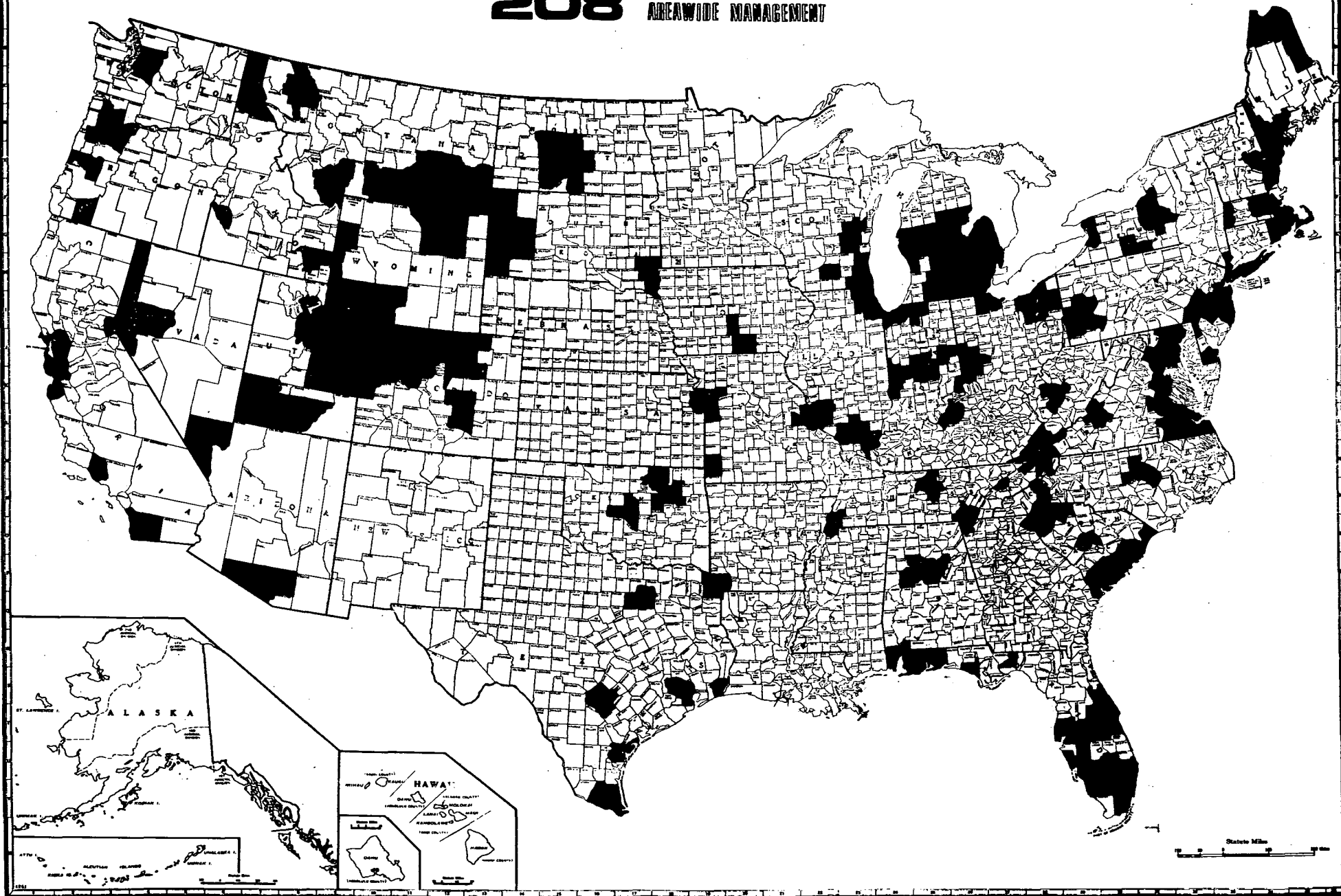
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# 208 AREAWIDE MANAGEMENT



## INTRODUCTION

At the end of FY 1975, a total of 149 local planning agencies had been designated and awarded planning grants under Section 208 of the Federal Water Pollution Control Act Amendments of 1972. A national profile of these local planning agencies was conducted during the first two months of FY 1976 in order to characterize the 208 agencies and their preliminary activities towards areawide management planning. The purpose of this report is to summarize this national profile. It must be emphasized that this report is based on available information at this point in time in the first month of the planning process. The data is a reflection of the local perspective of 208 planning, and does not address the state or federal viewpoint.

### Project Methodology

The project staff met in Washington, D.C., the first two weeks of June to review the 208 program and develop a set of questions and issues for the interviews. During this time they met with staff from EPA Headquarters, private consultants, and pre-tested the profile on a local 208 agency. Over the next 8 weeks staff members were then assigned to a Regional office, where they met with the EPA Regional Coordinators to review the office 208 files. They subsequently interviewed the designated agencies within the Region. When the interviews were completed, the staff returned to Washington to analyze the data and prepare this report.

The review of designation packages, grant applications and work plans was conducted along the lines of a structured profile. This information was then reviewed with the local 208 planning agency staff to corroborate the information and to supply additional information not covered in the available documentation. The structured profile consisted of approximately 175 items of information under the following headings:

- Area Description
- Designated Agency Description
- Coordination Activities
- Designation Process
- Grant Application Process
- Work Plan
- Public Participation
- Land Use
- Legal/Institutional/Management Issues
- Financially Self-Sustained Planning
- Evaluation of Technical Aids

136 of a possible 149 interviews were completed. Of the 13 agencies not interviewed, 9 were in Region IX. In some cases, however, information was unavailable, or agencies were unable to answer the questions as asked. Thus, the total responses to each question does not always add up to 136. Whenever possible available documents were studied to try to answer some of the profile questions when no interview was done, thus, in some cases the number will be 149-- the total number of 208 agencies.

Whenever a dash (-) is used in a table, it means that the question was asked and the response was negative, or that it was not a factor. Whenever a blank appears, it means that there was no response. This is due to any of three factors, the net result being no information. The factors are:

- 1) The interviewee did not have the background to answer the question.
- 2) The question was not asked due to lack of time.
- 3) The information was not available at that time.

The number of agencies for which there was no information for that particular question is totaled by region in the "no answer" column.

For some questions, agencies were asked to check several items when more than one answer applied. In these cases, total responses will add to more than 136.

Interviews generally took 3-4 hours. They were made with one person ("lead interview"), although other staff were often involved in answering some of the questions. Of the 136 agencies interviewed, 81 of the "lead interviews" were with the 208 project directors. When a 208 project director was either not yet hired or was not available, lead interviews were conducted with directors of the parent agency (27), with staff who wrote the original applications (16), with acting directors (4), and with other program directors of the parent agencies (5). Many interviews involved more than one person and over 86 other people were involved in part, including water quality engineers, planners, public participation specialists, citizens groups, and representatives of Indian organizations.

#### Section 208 of the Federal Water Pollution Control Act Amendments of 1972

Section 208 areawide planning and management is a comprehensive program established to bring about environmental quality on the nation's waterways by 1983. The program is designed for areas with substantial water quality control problems due to urban-industrial concentrations or other factors.

This program ties together the various federal water pollution abatement requirements including municipal, industrial, residual waste, runoff, and groundwater pollution abatement. The responsibility for planning and implementing these provisions rests with regional and local agencies.

### Major Issues

Several key issues were consistently expressed in the review of local planning agency documents and in the interviews with local 208 project staffs. These issues, discussed in more detail in the following chapters, are summarized below.

- Two-Year Planning Period -- Even though the agencies understood 24 months was the allotted planning period, they consistently asked for relief. Those interviewed claimed that two years was too short to accomplish all the analysis, planning, evaluation and approval required for the 208 plan. Staff recruitment, administrative organization, and the need for detailed work plans cut into the beginning of the 24-month period. Requirements for public participation and local review and approval were consistently reported to be very time-consuming and cut significantly into the planning period.
- Management/Institutional -- There is a strong commitment on the part of the designated agencies to develop and implement a management system, but at this time in the planning process, it was unclear what that system will look like, how it will be created and what powers it should exercise. Most agencies, however, did foresee a single planning agency and several management agencies as the probable framework. The majority will opt for modifications of existing arrangements rather than major institutional changes. The general insistence on "local autonomy" by jurisdictions within the 208 areas will be a serious constraint on innovative regional management alternatives.
- Financially Self-Sustaining Planning Process -- Most 208 agencies expressed serious doubts about their ability to continue planning on a financially self-sustaining basis after the 24-month period expires. Local governments will not be able to raise enough money on their own. Furthermore, they don't consider themselves bound by their resolutions-of-intent to pay for 208 planning after the termination of the grant, and presently are not showing financial commitment to

the continuing planning process. Federal and state financial assistance is therefore essential if 208 is to be the ongoing program it was intended to be.

- State Water Quality Information -- A major deficiency exists in the State 303(e) Basin Plans. Generally, 303's, in particular waste load allocations were either incomplete at this time, or inadequate because they were based on insufficient data (e.g. based only on dissolved oxygen content or incorrect sampling methods.) This places an extreme burden on 208 agencies which necessarily rely on the availability and quality of such data in the early stages of the planning process. It additionally places economic hardship and time delays on those agencies which must undertake the monitoring, modeling, and analysis efforts themselves.
- Budgets -- Budgets were generally inconsistent in format and incomplete in preparation at the time of interview. This was due to a lack of budgetary guidance (or its late delivery), and a lack of staff and expertise in price and cost analysis. If EPA should choose to assemble this data nationally, it will be very difficult to either analyze the direction (foresight), or evaluate the progress (hindsight) of the 208 program.
- Public Participation -- 208 Agency expenditures for public participation generally concentrate on a one-way flow of information to the public. This is necessary as a first step, but is certainly not sufficient. Mechanisms for feedback resulting from such efforts are necessary. If the general public is not accounted for except in the committee structure, it may create potential problems with plan acceptance. Furthermore, a major benefit in terms of public awareness will be lost to 208.
- Technical Guidance -- There is a serious delivery problem with EPA guidance between the Federal levels and local 208 planning agencies. A significant number of agencies never received the Handbooks, while over half of the agencies received them too late to be useful. The needs for technical guidance are similar throughout the country. The greatest demand was consistently for nonpoint source analysis, monitoring (point and nonpoint), urban storm water, and combined sewer analysis. The most requested management/legal/institutional seminar is for state specific legislation to enable alternative management structure.

## AGENCY PROFILE

### Findings

An examination of the characteristics of designated 208 planning shows several interesting and potentially significant aspects. Although each agency must respond to unique environmental conditions and a unique political institutional setting, there are many similarities which make comparisons beneficial. Furthermore, it is useful to identify unusual circumstances and approaches that may suggest improvements for the program as a whole. Some of the most significant findings are:

- Most 208 agencies are under the auspices of a parent agency<sup>1</sup> that has been in existence for several years and that conducts a variety of planning functions. A small number of agencies have been newly created and should be given high priority for additional guidance in their 208 effort. The starting point of these agencies is considerably behind that of established agencies. Those agencies with no water quality experiences should also be a high priority for special guidance and assistance.
- When in full operation, over 800 persons will be working full time on 208 staffs and another 800 "borrowed" from other agencies on a temporary basis. In addition, somewhere between 400 and 1,000 man-years of consultant time will be spent on 208 planning through contracts.

### Physical Characteristics of 208 Areas

The 208 area boundaries cover 390,562 square miles, or over one-tenth of the country.<sup>2</sup> In population, the program serves 95,403,219 people, or just under one-half of the country.<sup>3</sup> In response to the initial legislative intent to address urban/industrial water quality problems, 90 SMSA's are totally included in 208

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<sup>1</sup> Parent agency refers to the larger organization of which 208 planning is only one function. It is generally the RPA, COG or EDD, and the official recipient of the grant.

<sup>2</sup> Total area including Alaska, Hawaii and territories is 3,628,066.

<sup>3</sup> Total population of the U.S. in 1970 was 203,235,298.

boundaries and 49 more SMSA's are partially included.<sup>4</sup> The following table indicates the number of SMSA's that are either partially or totally included in 208 areas. (Table 1)

208 is also institutionally complex because it involves so many levels of governmental units, making coordination a key issue. Only eight states (Hawaii, Alaska, Vermont, Connecticut, Minnesota, Louisiana, Nebraska and New Mexico) have no 208's. Three states are included only through interstate 208 areas, and have no ongoing intra-state 208 planning. 385 counties are fully included within 208 boundaries and 111 more are partially included.

Table 1  
PARTIAL AND TOTAL SMSA'S WITHIN 208 BOUNDARIES

No. of SMSA'S	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
0	5	2	3	3	1	-	2	13	2	3	34
1	10	7	8	21	12	7	3	8	4	7	87
2	2	2	1	2	9	-	-	-	3	-	19
3	-	-	-	-	3	1	-	-	-	-	4
> 3	-	-	-	-	-	-	-	-	1	-	1
No answer	-	-	-	2	-	1	-	1	-	-	4
Total	17	11	12	28	25	9	5	22	10	10	149

<sup>4</sup>

On April 5, 1974 there were 269 SMSA's in the country. The number of partially included SMSA's is overstated due to the double counting resulting from one SMSA being in more than one 208 area.

## Type Agencies Designated

The following table indicates the type of agencies designated to do 208 planning.

Table 2

### TYPE OF AGENCY DESIGNATED

COG, RPA or EDD	County Government	Water Quality Agencies or Sanitation Districts	Interlocal Agreement	Other	Not Available	Total
113	9	5	7	7	8	149

In the majority of cases (113 or 84%) this meant a regional government, usually called a Regional Planning Agency (RPA) or a Council of Government (COG) or an Economic Development District. There is not a meaningful distinction between these three; the differences in name were generally explained by choice of wording in state-enabling legislation.

In some cases the traditional regional planning agency was not the designated 208 agency. The 16% non-COG type agencies represent a range of governmental units with varying powers. Nine designations were to county governments or county planning boards and five are to water quality agencies or sanitation districts. These agencies may have considerably more implementing powers and therefore may be able to provide a smoother transition to the management phase and ongoing planning process than the typical COG.

In a few instances, non-regional agencies were designated. Rhode Island State Office of Planning is a case of statewide 208 planning. Special arrangements were made to conduct 208 planning in Guam and in Puerto Rico. In New York City, the Environmental Division is the designated agency, while the Delaware River Basin Commission is doing planning for three 208 agencies.

Seven 208 designations were made to two agencies jointly through a consortium or an interlocal agreement. In most of these cases, both agencies had originally applied for 208 designation in the same or in adjoining areas. The nature of the water quality problem was such, however, that a joint approach made more sense. In these instances a lead agency was chosen and a Joint Working Task Force formed. Formal working agreements and work outlines were required as a condition of designation either by the Governor or by EPA.



## Experience of Agencies

208 agencies' experience in planning is presented below.

Table 3

### 208 AGENCIES' EXPERIENCE IN PLANNING

New Agency	Less than 2 Years	2-5 Years	5-10 Years	Over 10 Years	Not Available	Total
17	14	16	55	34	13	149

Only 17 agencies were newly created to do 208 planning. About half of these were in Region VIII. All other designated 208 agencies already existed, nearly 65% within an agency that has been in existence for five years or more. This previous agency experience will be a valuable asset to 208 planning, particularly in light of the short time 208 has to begin producing outputs. Such agencies cannot only offer familiarity and informal contacts within the designated areas, but also have data, offices and staff that can be shared. 98 of the 208 agencies are physically located in the same place as the parent agency.

Coordination is another advantage to this parent-208 relationship. Only fifteen of the agencies conducted just 208 or one other kind of planning. 80 of the parent agencies conduct at least five other kinds of planning functions. The most common were HUD 701, noted as a prime function of at least 109 agencies and areawide transportation planning which was a responsibility for 92 agencies. This situation provides an excellent opportunity for coordination and for joint efforts. 84 programs are A-95 review agencies. This fact will become more important during the implementation phase of 208.

As for other environmental planning responsibilities, 62 parent agencies conduct solid waste planning, 29 do air quality planning, and 32 do Coastal Zone Management work. Thus, there is a high potential for inter-media coordination.

The following table presents the breakdown of the various other planning functions performed by 208 agencies.

Table 4

## OTHER PLANNING FUNCTIONS PERFORMED BY 208 AGENCIES

Planning Program	Number of Agencies
DOT	88
Coastal Zone Management	32
HUD 701	119
Air Quality Maintenance Area	29
Solid Waste	62
Areawide Transportation	92
Corps of Engineers	21
Forest Service	14
Soil Conservation Service	22
A-95 Review	84

As for water-related planning experience, only 30 agencies had no previous experience. 28 had direct experience, many having completed a 3-C plan. 69 had related experience either in-house or through consultants. Thus, nearly three-quarters are at least partially familiar with the water quality and their related institutional problems.

### Staffing

By the time of the interviews (July 1975) 325 professionals and 97 non-professionals were working in 208. Anticipated nationwide totals are for 653 professionals and 184 non-professionals. In addition 208 agencies expect to "borrow" from parent agencies and other agencies an additional 834 persons. These would most often be legal, financial, public participation, land use planners, executive directors and secretaries, who will spend most of their time on other projects, but will be available to 208. Thus, in 136 agencies nearly 1,700 staff people will be involved in 208 in some way, once 208 is in full operation. These 1,700, however, will not necessarily be newly hired. Many, perhaps the majority, will be switched either from the parent agency or an agency

dealing with water quality planning. Consultants form another significant manpower resource for the 208 planning effort. Based on the percentage of grants for outside contracts (see Budget), it is estimated that between 400 and 1,000 consultant man-years will be employed during the two year planning period. This estimate is based on the average value of contracts and average consulting man-year costs.

75 agencies indicated that staffs were only being hired for the two year planning period due to the uncertainty of future funding. This may have unfortunate consequences to 208 during the ongoing period following the initial two years. The earlier 1974 programs experienced some problems in staff hiring because 208 was still unheard of. More recent programs have had no trouble hiring planners, but some problem hiring experienced people. This was mentioned in connection with the unattractiveness of a limited two year job for upper level engineers.

Given the dual technical/management nature of 208 it is interesting to look at the backgrounds of those who will be chiefly responsible for the final end-products. 98 of the 208 Project Directors had been hired by the time of the interviews. 65 are planners by discipline, 18 are public administrators, and 34 are sanitary or civil engineers. The rest all have backgrounds in various disciplines. Thus, the disciplines of the directors would seem to reflect a recognition of the planning/management aspects of 208.

## ENVIRONMENTAL ASPECTS

### Findings

A review of the environmental problems facing 208's around the country uncovered the following major issues:

- The water quality factors most often cited as critical to designation as a 208 agency were water quality limited segments, substantial industrial pollution, and urban storm drainage.
- The water quality parameters considered critical to meeting the 1983 goals were coliform bacteria, dissolved oxygen and nutrients - these turn out to be the most often and easily measured.
- Water quality data essential to 208 plans was often incomplete or unavailable because the states are not producing the required 303(e) outputs. Many agencies are therefore placing great emphasis on their own monitoring efforts.
- The two major problems in monitoring and analysis are 1) regional differences in the administration of EPA monitoring/modeling policy, 2) scheduling monitoring activities within the 24-month period.
- The primary reasons for not achieving the 1983 "fishable, swimmable" goal are 1) lack of technology for nonpoint source control and 2) lack of public funds for structures to control urban storm water.

### Current Water Quality Problems

The following table lists those water quality factors mentioned as reasons for areawide designation.

Table 5  
FACTORS RESPONSIBLE FOR DESIGNATION

F A C T O R S	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Water quality limited segments Preservation/Protection of high quality waters involving --	15	-	9	22	21	5	4	15	3	9	103
unique resource impaired by growth	14	5	5	7	10	1	4	9	3	7	65
complex institutional setting	11	4	6	5	11	3	5	8	-	5	58
complex sources of pollution	15	5	6	6	7	2	5	5	2	6	59
state preservation statement (non-degradation)	15	3	3	5	7	-	1	6	3	4	47
Municipal waste management by two or more local governments	16	8	8	20	11	5	5	9	1	2	85
Substantial industrial pollution problems	13	9	8	20	20	5	4	11	3	5	98
Substantial urban storm drainage	13	9	6	20	15	2	4	12	2	-	83
Substantial nonpoint sources											
agriculture	13	4	9	20	17	2	3	7	1	9	76
silviculture	6	-	5	6	3	-	-	6	1	7	26
mining	5	2	3	4	3	1	2	14	4	4	38
construction	13	8	9	19	8	2	2	13	4	9	74
septic fields	15	7	8	19	11	2	4	7	-	6	74
benthic (sludge)	13	6	5	3	7	-	2	-	1	4	45
combined sewer overflow	11	5	5	6	21	-	3	3	5	3	59
urban storm water	13	8	8	18	15	3	4	10	2	8	79
feedlots	6	3	5	9	5	2	1	9	1	2	40
other	2	-	1	-	7	-	1	1	4	-	16
Groundwater Pollution											
contaminated groundwater of major water source	13	5	4	6	12	-	2	11	-	-	40
groundwater pollution con- tributes to surface water problem	11	5	3	7	2	-	1	4	1	-	34
complex groundwater problem	11	5	4	7	2	1	1	4	1	-	35
state or area groundwater goal	12	3	2	3	1	-	-	-	-	-	18
saltwater intrusion	2	4	4	6	1	-	-	-	-	-	16
other	2	-	-	-	1	-	-	-	-	-	3
Discharge from wastewater treat- ment plants	3	-	-	-	8	-	-	-	-	-	11

## Lack of Water Quality Data

An essential ingredient for a successful 208 program is the availability of water quality data which accurately defines problems in such a way that control strategies and alternatives can be developed. Incomplete and often unavailable water quality information was causing considerable problems for 208 agencies. Many agencies expressed concern that this would delay the completion of their plan. The agencies reported that the 303(e) Basin Study outputs are not sufficiently developed, and sometimes not readily available to satisfy the needs of the 208 agencies (see Chapter on Coordination).

About one-half of the agencies have wasteload allocation information available. However, many of those agencies feel that the allocations will need reevaluation. The most often cited reasons for reevaluation were insufficient data, faulty modeling, and a lack of confidence in the results. The other half of the 208 agencies did not mention having wasteload allocation information. This is due to one of three reasons: The states have not developed wasteload allocations yet, the programs have not contacted the states for the wasteload allocation information, or the fact that some areas do not have water quality limited segments and, therefore, wasteload allocations are not applicable. Regardless of the source of the problem, the lack of availability of useable data will delay the program.

The lack of available information has generated great concern about monitoring and analysis. 83 agencies stated that monitoring will definitely be conducted in their areas; 10 stated that they might do it. The most often cited reasons for doing monitoring were ranked as follows: to determine the spatial and temporal extent of the problem, to determine whether certain problems exist, to measure the magnitude of nonpoint source loads, and to collect, calibrate or verify data for nonpoint source analysis. The interviewees stated that the credibility and acceptance of 208 pollution control strategies would depend upon sufficient data to demonstrate the cause/effect relationship between land use and water quality in their particular areas. They feared that incomplete information might result in delay of plan approval and court action by impacted localities and industries.

The 208 agencies anticipated two major problems in monitoring and analysis. One problem occurred in getting monitoring activities approved by the Regional EPA office. Some Regions interpreted the Program Guidance Memorandum, AM-8 to mean little or no monitoring and modeling should take place, while other Regions assessed the monitoring and modeling requests on a case-by-case basis. Those agencies that are not monitoring anticipate problems establishing control strategies. In several instances, monitoring was not permitted in water supply areas despite the fact that they were prime areas for residential growth.

The presence of water quality limited segments was the major reason for areawide designation in 103 areas. Industrial pollution (98 mentions), municipal waste by two or more local governments (85 mentions), and substantial urban storm drainage (83 mentions) are other nationally significant water quality problems.

In the area of nonpoint sources, the predominant problem is urban storm water in 79 areas. 76 agencies stated both construction and septic fields as nonpoint source pollution problems.

Where groundwater pollution was a problem, it was considered a major and difficult task in water quality management. The most important groundwater problem mentioned was the contamination of major groundwater drinking supplies (40 mentions). 35 agencies stated they had a groundwater problem, and 34 said their groundwater problem contributed to surface water pollution problems.

Important water quality parameters (and the number of agencies that mentioned them) are presented in the following Table 6. The table totals the number of responses for each parameter by Region. The extent of these problems is not really known, particularly with regard to groundwater

Table 6  
PROBLEM PARAMETERS IN 208 AREAS

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Dissolved Oxygen(D.O.)	13	8	10	17	22	5	5	8		8	96
Nutrients	13	8	9	17	16	4	4	7		7	85
Coliform bacteria	16	7	9	18	18	4	4	12		10	98
Suspended Solids	15	7	8	9	17	3	3	14		7	83
Pesticides/Herbicides	11	3	5	10	15	1	3	2		3	53
pH	4	1	3	5	6	1	1	2		2	25
Heavy metals (specify)	9	4	7	6	14	1	2	12		2	57
Toxics (specify)	10	3	4	5	4	-	3	12		3	44
Temperature	5	6	5	2	10	-	2	3		8	41
Total dissolved solids (TDS)	10	2	5	3	9	2	3	14		4	52
Benthic deposits	12	6	5	3	4	-	1	1		4	36

Another problem in monitoring and analysis involves the time it takes to collect data. In many cases, other tasks are dependent on the availability of that data. Moreover, there are only two summers in which to collect low flow data for 208; this means that scopes of work must be prepared and contracts let very quickly. Most agencies will have only one summer to do sampling, as the low flow period has passed for the first year of the planning period. Laboratory overloads, and in some places their distance from sampling stations, are also anticipated as problems in a monitoring program. The two year planning period therefore puts severe constraints on the development of pollution control strategies where data is not available.

In addition to a lack of stream monitoring data, there is also a lack of point source discharge information. Agencies have reported that the data from the NPDES permits does not provide the type of information necessary for modeling purposes; others have said they had difficulty getting the data that was available. Some agencies had to pay for the permit information while others were invited to search state files to obtain it. Industrial and domestic point source data was occasionally nonexistent. At the time of interviews, only 53% of 208 agencies interviewed had obtained list of point source discharges.

### The Impact of 208 on 1983 Goals

208 agencies were asked to indicate whether the 1983 goals could be met as a result of implementing the plan. The results are presented in Table 7.

61 of the agencies said part of their area could meet the goals; 24 said all of their area; 12 said none of their area; 31 did not know; 5 said their whole area already met the goals.

Reasons for not achieving the 1983 goal are listed in Table 8. The most often cited reasons for not achieving the 1983 goals were: lack of technology for nonpoint source control; lack of public funds for structures to control urban storm water, and irreversible or slowly reversible water quality problems. Some agencies, in responding to the question, said that "fishable and swimmable" had not been sufficiently defined. Others felt that the delay in getting the 208 plan approved would result in a delay in achieving the '83 goals. Finally, a few agencies stated that the 1983 goals will be met, but that the water quality level would not be sustained due to increases in population and the limits of present abatement technology.



Table 7

## ACHIEVEMENT OF THE 1983 GOALS

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Will the 1983 goal be met everywhere or anywhere in the planning area as a result of implementing the study?											
Everywhere	3	-	1	3	3	2	-	7	1	4	24
Some places	4	10	3	18	12	3	-	6	-	5	61
Nowhere	6	-	-	-	3	1	-	2	-	-	12
Don't know	-	-	8	5	7	2	2	6	-	1	31
Already meets 1983 goals	4	1	-	-	-	-	-	-	-	-	5
No	-	-	-	-	-	-	3	-	-	-	3
TOTAL	17	11	12	26	25	8	5	21	1	10	136

Table 8

## REASONS FOR NOT MEETING THE GOALS

R E A S O N S	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Irreversible or slowly reversible water quality problems	8	-	-	5	7	1	1	-		4	26
Lack of best available technology for point source control	3	1	2	2	8	2	1	1		1	21
Lack of technology for nonpoint source control	6	2	2	7	12	-	3	2		6	40
Lack of public funds for structures to control urban storm water	9	1	1	8	10	2	4	2		3	40
Difficulty of the required analysis and probable lack of confidence in results	4	-	1	-	5	1	3	-		3	17
Inability to show cost-effective control alternatives	3	-	1	5	3	1	1	-		3	17

\*Total is greater than 136 due to multiple responses.

## LAND USE ASPECTS

### Findings

The information gathered on land use revealed the following issues:

- The EPA time limit for Interim Outputs places a severe burden on some agencies whose land use elements are less advanced and will require significant data collection and updating. Some agencies stated that not meeting the 9-month deadline would not necessarily hinder other 208 planning activities.
- Where available, most HUD 701 data was out-dated and incomplete, although there were some cases where it provided an adequate base for 208 planning.
- Agencies are often unable to identify, quantify and relate nonpoint source pollution to land use and water quality.

### Land Use Considerations in the 208 Planning Process

#### Land Use Projections

It was originally envisioned that most designated agencies would be able to use HUD 701 or local data for their land use plans and projections. Unfortunately, many areas have not found this feasible. Even where there was a great quantity of information, many 208's felt that existing 701 data was less than complete and often outdated. 28 of the responding agencies with existing land use plans available indicated that existing 701 would require extensive development or updating for their 208 project. Therefore many agencies felt that they would have to undertake additional land use tasks that were not originally envisioned under 208 planning. While 93% of the 208 agencies have 701 planning ongoing in their respective areas, only 78% were actually doing this planning themselves. 42 agencies plan to contract out either all or part of their land use element.

The need to do additional land use work should not be construed as an insurmountable roadblock in the 208 planning process. Many parent agencies were already engaged in updating their land use plans or working in conjunction with their 208 divisions to revise the existing information. The data developed through these efforts will help lighten the burden on the 208 program.

## EPA - HUD Agreement

The agreement between EPA and HUD, clarified in AM-9, has not reached many 208 agencies. Those agencies that were familiar with AM-9 were rarely able to directly follow the specified funding procedure. This is not to imply that there is a complete absence of coordination. In areas where a strong 701 program is under way, an equitable division of costs is usually reached under locally designed arrangements. In a number of areas where 701 funds are drying up, 208 is assuming the major cost of land use elements. In no case was the work of one program being repeated in another.

In short, the agreement has fostered locally tailored coordination between the 701 and the 208 programs. Although not directly in line with the AM-9 Memo, this has been a step toward elimination of duplication of Federal efforts in local areas. It has additionally evolved a process of dividing costs, an important aspect of improving coordination among Federal grants for local jurisdictions.

### Budgets

The following table depicts the percentage of their grant to be spent on land use. (See Table 9)

44 of the agencies interviewed plan to spend from 8-15% of their total budgets on collecting and analyzing their land use data. 19 will spend over 16% on land use, while 49 did not have their land use budgets developed yet. Since there was no standardized budget guidance from EPA, and subsequently no clear definition of land use for all the agencies to follow, land use expenditures were often hidden in nonpoint source analysis budgets. In addition, there was often no breakdown in the budgets between point and nonpoint sources of pollution, thus making it difficult to determine the total amount of money spent on land use.

### Interim Outputs

87% of the agencies interviewed indicated that they would be able to meet the nine-month Interim Output deadline. 29% have computerized data banks that include land use information, while another 43% have non-computerized land use data available in a variety of forms. The remainder feel they will be able to gather the information required. However, 13% indicated they will not be able to gather the needed information on time. This problem was primarily attributed to a lack of land use plans within their jurisdictions.

By establishing time limits for Interim Outputs, EPA has put these agencies at an early disadvantage. Those agencies that must devote a large amount of time to the development of land use information

often have less time to devote to other key planning issues, such as management and analysis, during the initial stages of the project.

Table 9

PERCENT OF BUDGET ALLOCATED FOR THE LAND USE ELEMENT UNDER 208

% of grant to be spent on land use	NUMBER OF 208 AGENCIES										Total
	R E G I O N										
	1	2	3	4	5	6	7	8	9	10	
0- 3%	-	-	1	-	4	-	1	-	-	2	8
4- 7%	-	1	2	4	2	-	1	3	-	3	16
8-10%	6	1	2	7	3	-	1	2	-	2	24
11-15%	7	-	-	3	1	1	1	6	-	1	20
16-20%	3	-	1	2	1	-	-	3	-	-	10
> 20%	1	-	-	2	-	-	-1	5	-	-	9
No Answer	-	9	6	8	14	7	-	2	1	2	49
Total	17	11	12	26	25	8	5	21	1	10	136

## Nonpoint Source Pollution and Land Use

Nonpoint source pollution is a major reason for areawide waste treatment management planning. However, many agencies expressed concern over their present inability to identify and quantify nonpoint source pollution and their subsequent difficulty in relating land use to nonpoint sources and water quality.

The following table indicates nonpoint source pollution problems in 208 areas.

Table 10  
SUBSTANTIAL NONPOINT SOURCES

Nonpoint Source	Mentions by 208 Agencies
Agriculture	76
Benthic (sludge)	45
Combined Sewer Overflow	59
Construction	74
Feedlots	40
Mining	38
Silviculture	26
Septic Fields	74
Urban Storm Water	79
Other	16

One means of determining nonpoint source pollution is the development of conversion factors that would relate land use to water quality. While few agencies have actually undertaken this endeavor, almost half the agencies interviewed said they will develop these figures at the appropriate time. Although not asked in the interview, five agencies indicated they plan to use published conversion factors and would like some guidance from EPA concerning this matter.

## MANAGEMENT/INSTITUTIONAL ASPECTS

### Findings

Management is the structure and process by which a 208 plan will be implemented. It is a system of actions and institutional arrangements necessary to achieve and maintain water quality goals. The major findings related to the management and implementation of 208 plans are as follows:

- The majority of 208 agencies do not feel they have the in-house capability to deal with the management/institutional issues and are contracting for this work. Fully a third of the agencies have yet to decide whether they or consultants will complete this element of the plan. This may be a problem in view of the time it takes to let out contracts and the importance of considering management from the outset of 208 planning.
- There is a strong commitment on the part of the designated agencies to develop and implement a management system, but considerable uncertainty at this point in the process, as to what that system will look like, how it will be created and what powers it will exercise.
- Local 208 personnel are uneasy and uncertain about EPA's enforcement powers; if the Agency is considering real sanctions, it should make them known.
- A single planning agency and several management agencies is the institutional arrangement for 208 management foreseen by most of the interviewed agencies. There will be very few "super agencies." Most 208's will opt for modifications of existing arrangements. Rather than major institutional changes, the general insistence on "local autonomy" will be a serious constraint on management alternatives.
- The concept of a lead management agency and the relationship of the planning agency to the management agency are not understood.

## Designated Agencies Capabilities in Management Planning

There are few generalizations that can be made about the existing institutional arrangements in 208 designated areas. One characteristic shared by most 208 areas was municipal waste management by two or more local agencies. This kind of fragmented approach to treating waste is the reason for 208's areawide approach, and 69% of the agencies interviewed said it was a factor in their designation.

More than half the agencies responding said the protection or preservation of high quality waters was made difficult by a complex institutional setting. 208's mission is to create order from chaos through one integrated waste management system, (though that may be composed of several different management agencies and many plants).

Table 11 describes who will be undertaking the management work element in each of the agencies interviewed.

Table 11

WHO WILL DO THE LEGAL/MANAGEMENT/INSTITUTIONAL  
WORK ELEMENT OF THE 208 PLAN?

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Consultant	6	6	7	18	0	6	3	15	1	9	71
In-house	2	5	2	4	4	-	-	-	-	-	17
No answer	9	-	3	4	21	2	2	6	-	1	48
Total	17	11	12	26	25	8	5	21	1	10	136

The majority of 208 planning agencies did not feel they had the in-house capability to deal with the management/institutional issues alone. Only 17 are doing it all in-house; many more will share this responsibility with consultants. 71 are contracting for at least a part of this planning and analysis. 48 agencies have yet to decide whether they or consultants will do the work. This is a potential problem area considering the time it takes to let out contracts and the importance of considering management from the outset of 208 planning. When asked when they planned to undertake the analysis of management alternatives, agencies responded with the range of day-one to as late as the 18th month in the planning process. Table 12 presents the results.

Table 12

## WHEN WILL MANAGEMENT ALTERNATIVES ANALYSIS BEGIN?

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
0 - 1 month	6	-	-	2	6	1	-	3	1	4	23
2 - 6	10	2	-	5	6	5	1	8	-	2	39
7-12	-	-	-	7	6	1	1	3	-	4	22
13-18	-	-	-	3	1	-	-	2	-	-	6
19-24	-	-	-	-	-	-	-	-	-	-	-
Don't know	-	-	-	6	6	1	-	2	-	-	15
No answer	1	9	12	3	-	-	3	3	-	-	31
Total	17	11	12	26	25	8	5	21	1	10	136

The notion of a statewide model for a management system has been considered in several states. Most of the 208 agencies in Texas will let a joint request-for-proposals for their management/institutional planning. In Maine, the designated agencies have agreed to jointly finance either one consultant or one selected agency which will research some of the common management institutional questions facing all of them.

### Major Issues

#### Commitment

There is clearly a strong commitment on the part of the designated agencies to develop a management plan that will be both effective and capable of implementation, though that commitment is hard to quantify. The most obvious evidence of such a commitment is that 12% of their grants is the average amount agencies will spend on their legal/management/institutional work elements. 15 of the agencies have, or will soon have, lawyers on their staffs to deal with implementation issues and any other legal problems; 46 will have public administration or management specialists.



One particular situation should be carefully watched. One of the earliest funded 208 agencies does not intend to tell its constituent jurisdictions what is the best institutional arrangement for 208 implementation. This agency sees its role as going no further than the presentation to its local governments of alternative management systems - the decision as to which alternative to implement being left to the locals. This will be a problem if locals do not feel compelled to choose an alternative, and the management system becomes shelved with other planning programs. This situation should be carefully watched to insure that implementation is an integral aspect of the plan.

Regarding those agencies that are committed to selecting one management arrangement, it is not clear to them how to achieve a system that is both effective and can be implemented. Certainly, some compromises will have to be made by all agencies to ensure local, state and federal approval.

#### Agencies' Knowledge/Understanding of Management/Institutional Aspects

Most agencies are aware of the particular emphasis of 208 on management and implementation. They know that only the most appropriate and innovative management systems will be effective and that EPA will not accept the designation of a management agency if it does not have the authority to carry out the plan.

208 personnel are confused, however, about EPA's enforcement powers. For example, it is unclear whether permits or construction grants will be denied in order to encourage completion or approval of a plan. Many agencies voiced the fear that EPA was a "paper tiger"; if the Agency is considering real sanctions, it should make them known. This would spur 208 agencies to make the kind of commitment to management and implementation that will be necessary to develop a worthwhile system.

Although aware of the need for an areawide management system that will "meet the requirements of the Act", the agencies are unsure what that system will look like, how it will be created and what powers it will exercise. For example, 89% of the agencies interviewed said they would find management/legal/institutional seminars useful. Their comments in response to this question demonstrate a great desire for state-specific guidance as to legislation needed and how to go about getting it; and for innovative institutional and financial arrangements. 22% of the agencies could not make an educated guess as to who the management agency would be and as mentioned above, several agencies said it was not their responsibility to select a management agency. About one-third of the responding agencies were not familiar with the required authority of a management system set forth in Section 208(c), and many react with incredulity to the suggestion that their management agency be able to do such things as incur indebtedness and refuse wastes from publics not complying with the plan, both of which are required by Section 208(c)(2)

## Optional Management Systems

Section 208 allows states and localities great flexibility in designing areawide waste management systems, and EPA encourages 208 agencies to find the best institutional arrangement to deal with its own water quality and financial needs. Possible 208 management systems can be placed in 3 categories: single agency for both planning and management; single planning agency and a single management agency; and single planning agency and plural management agencies.

"In some situations, when a single governmental jurisdiction already exists and encompasses the entire 208 area, it may be assigned both the planning and management responsibilities."<sup>1</sup> Of the 136 agencies interviewed, however, less than 20 have any management capability at all, i.e., are something other than COG's with virtually no implementation authority. Furthermore, most of these agencies only have limited implementation capability, and could not serve as the sole management agency. Only 3 of the agencies interviewed thought that they would be the 208 management agency.

Another option is to designate one management agency, separate from the planning agency. This arrangement will not appear very often, judging by the present thinking of the designated planning agencies. Only 11 of those interviewed expected there to be a single management agency.

The third option, single planning agency and plural management agencies, was definitely preferred by designated planning agencies. "This option would allow those management agencies already providing waste treatment service to continue doing so with a minimum effect upon their internal administration."<sup>1</sup> Coordination between planning and management will suffer in this type of arrangement, but individual local governments will "retain their own waste treatment agencies and other authority,"<sup>1</sup> a consideration uppermost in the minds of those agencies searching for a plan that will win local approval. 68 agencies, or just over half of those interviewed, felt there would be several management agencies in their areas. There was an even split among the 68 agencies between those expecting there to be several management agencies with a high degree of regional authority and those expecting several management agencies with much local autonomy. 8 other interviewees volunteered that management would be solely by local governments. There are only 19 agencies that predicted the creation of a new agency to manage and implement 208. 32 would not make a prediction as to the structure of their management system.

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<sup>1</sup>  
Draft Guidelines, May, 1974.

In discussing expected management organizations with 208 personnel, it became clear that most had done little thinking about the subject. Those that had seriously considered it were rather confused about the relationship of the planning agency to the management agency. Almost all of them expected to do the ongoing 208 planning themselves, but were not clear on just what that would entail and how it would relate to the implementation or management of the program.

An equally confusing concept is that of a lead management agency. EPA's Draft Guidelines state that "whatever approach is taken, the essential consideration is that coordinative authority capable of facilitating the resolution of conflicts and implementation of the plan be a central component of the management system." This has done little to clarify the situation in the minds of 208 project directors. They don't know whether they must have a lead agency or what authority the lead agency should have.

Compounding the difficulty in selecting a management agency are the political situations in which 208 planning proceeds and which it cannot ignore. More than a third of the agencies experienced delays in obtaining resolutions of intent from local governments and 22 said there was public disinterest or hostility toward 208 planning. 55 agencies expect local review and approval to be a problem.

Whatever management systems are chosen will undoubtedly leave a great deal of management authority in the hands of local governments. Most responses to questions about 208 implementation centered on the fear of local jurisdiction of losing autonomy and control. Many interviewees spoke of the "ramifications" of management. One agency took 9 months convincing its local jurisdictions to participate in 208 because of their fears regarding the prospective management structure.

### Methods of Organization

If a plan does nothing to change existing institutional arrangements and leaves the bulk of authority with local governments it will be considerably simpler and easier to implement. Even where local ordinances or contracts are the only legal arrangements to be made,

plans to obtain them. Many of the agencies responding said that a contract would have to be negotiated between the designated management agency and local governments or that some kind of joint establishment between the management agency and the local governments would be likely. Most interviewees believed that new state enabling legislation or changes in State law would be required.

## Required Authority and Regulatory Controls

Section 208(c) (2) states that an areawide management system must be able to:

- design, construct and operate waste treatment works
- accept and utilize grants
- raise revenues and assess waste treatment charges
- incur indebtedness
- require participating communities to pay proportionate share of treatment costs
- refuse wastes from publics not complying with the plan
- accept industrial wastes and set pretreatment standards

Many 208 agencies are not yet aware of the Act's requirement of these powers. They are not thinking of one management system that will have all these capabilities. This may be attributed to the early stage of the program in most areas.

When asked what regulatory controls would be used, many agencies were unable to answer, again because they had not begun to consider the subject. The most oft-cited method was metering of wastewater flow, then building and housing codes and subdivision regulations, discharge permits, zoning, planned unit developments, and finally differential tax assessments. Discharge permits will be more heavily relied upon than this rank-order shows, since most agencies will be relying on the state and Federal governments to administer the permit program.

The responses to the potential regulatory methods naturally vary considerably from state to state. In a few areas, the notion of land use control is feared by the locals, and 208 agencies are struggling with ways to get around local practices and beliefs. There is a rule for the states to play in this area, where legislation could mandate a change in local unwillingness to accept any form of land use controls.

# PUBLIC PARTICIPATION

## Findings

At this time, it is too early to judge the effectiveness of 208 public participation efforts. Most agencies are in the early stages of their projects and only a few have begun any significant public participation work.

The profile study did, however, reveal a number of patterns and issues which appear to be developing across the country:

- The majority of agencies are designing public participation programs in compliance with EPA minimum guidelines (40 CFR 105).<sup>1</sup>
- Agencies generally recognize the importance of securing public approval of 208 if the plans are to be accepted and implemented.
- 208 agencies expect to experience various forms of opposition from citizen groups and individuals.
- 208 agencies' public participation expenditures are generally used to develop a one-way flow of information to the public. This is a necessary first step, but mechanisms for feedback are essential. Plan acceptance will be jeopardized if the general public is only included in 208 planning through committees; furthermore, an excellent opportunity to involve the public in pollution control will be lost.

## Who is the Public?

"Publics" potentially affected by the 208 program can be broken into three levels to facilitate differentiating among the various groups that are part of the planning process.

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Public Participation in Water Pollution Control

- Level I is composed of governmental agencies linked to environmental management, and private businesses which depend directly on the use of environmental resources.
- Level II includes special interest groups and organizations concerned about environmental management.
- Level III is the general public whose attention is unlikely to be focused on environmental planning unless a crisis has alerted them to their dependence on sound environmental policies.

### A Shift in Approach

Most 208 agencies recognized the need to include the public throughout plan development. Past experience with other water quality programs has convinced them that waiting to "sell" the public a completed plan usually fails. This was particularly true with regard to state 303(e) plans where the public felt left out of the planning process. In fact, many agencies said it was necessary to disassociate themselves from 303(e) plans because of the hostilities created during that process.

### Experience with Public Participation Programs

Table 13 indicates the experience of the 208 agencies with public participation programs.

Table 13

#### EXPERIENCE IN PUBLIC PARTICIPATION PROGRAMS

Experience in Public Participation	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Yes	17	9	12	24	23	7	5	13	1	10	121
No	-	2	-	2	2	1	-	8	-	-	15
Total	17	11	12	26	25	8	5	21	1	10	136

121 agencies had previous experience with public participation programs. Some of these agencies had developed environmentally concerned constituencies, which would be rallied again for the 208 program.

15 agencies had no previous experience with public involvement. Over half of these are located in the more remote areas of the West where planning itself is a relatively new activity. A number of inexperienced agencies voiced some concern over their ability to get an effective program working early enough in the planning process.

### Budget and Staff

The following table depicts regional allocation for public participation programs.

Table 14

#### RANGE OF THE % OF BUDGET ALLOCATED FOR PUBLIC PARTICIPATION

Allocation	R E G I O N									
	1	2	3	4	5	6	7	8	9	10
Low (%)	5	3.5	3	2	2	3	2	1.5	10	1
High (%)	20	10	20	14	20	10	17.3	9	10	13
Average(%)	9.4	7.5	9	6.8	10	5.3	9.1	4	10	4.1

Budget allocations for public participation ranged from 1% to 20% of total grant awards with an average allotment of 8%. This wide range was experienced because some regions advised their 208 agencies to allocate a uniform dollar amount for public participation rather than a percentage of their budget. This statistic also does not reveal all monies that will be spent on public participation. For example, funds to be spent on committees, plan approval, and other coordination activities are often included in other budget categories.

Table 15 indicates how the agency will delegate responsibility for the public participation programs.

Table 15

RESPONSIBILITY FOR PUBLIC PARTICIPATION  
PROGRAMS\*

Public Participation	R E G I O N										Total
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Public Participation Coordinator	8	1	5	12	19	5	2	7	1	3	63
Other Staff	13	7	5	11	3	1	3	13	-	8	64
Consultant	3	1	2	2	-	2	-	7	-	-	17
* Does not equal 136, as some agencies indicated joint work											144

Part of the public participation money will be used directly to hire in-house staff and consultants. 63 agencies indicated they would hire a staff member specifically for the purpose of coordinating the public participation program. 17 agencies intended to hire a public participation consultant to help design and implement a public involvement strategy. In 64 agencies, various staff members will conduct the public participation activities. In a few cases, project directors will be directly in charge.

The majority of agencies had not yet formalized an internal communications system to insure proper transmission of input gathered through the public participation.

### Committees

All of the 208 agencies have or will be setting up committees with representatives from all levels of the public to assist with the development of the 208 plan. Some of the more established 208 agencies have extensive networks of committees in operation, while many new or single purpose agencies only have an agency governing board at the present time.

For the purposes of 208 planning and implementation there seems to be three basic types of committees which will be in operation in most 208 areas. These are the general planning advisory committees, technical committees and sub-committees, and citizen advisory committees. The planning advisory committees (also called policy advisory committees, water quality task forces) are quite consistent across the nation. They usually constitute the formal link between the program and the parent organization, reporting to the parent organization's governing body on the progress of the program. These committees will revise the work plans and review results of data collection, and management analysis.



Membership on these committees primarily includes government and business representatives (Level I) with additional representation of interest groups (Level II) and private individuals (Level III).

At the time of the interviews there were 65 planning advisory committees in operation, with the balance yet to be established. Eight of these committees are joint task forces composed of representatives from two agencies in dually designated 208 areas. The average size of these committees is about 25, although there was a range of 3 to 90 members.

The technical advisory committees (in some cases, sub-committees to the areawide 208 planning committees) assist in the development and review of technical elements in the program. Although representatives from all levels of the public exist, government staffs and business representatives predominate. Most members are sewer district managers, city managers, and representatives from various water and sewer authorities, as well as State and Federal agencies. There are currently 59 technical committees in operation throughout the country. Most have a membership of approximately 20, although the numbers range from 7 to 64.

The citizen advisory committees are the principal avenues for the Level II and III publics' input into the planning and decision making process. 45 of these committees were already formed at the time of interviews. Their average membership is 35 with a range of 5 to 250 members.

The majority of the 208 areas have opened committee membership to any interested individuals. Some agencies qualified this condition, however, by specifying that only approved members could vote. In one state, for example, the Governor issued an executive order specifying that he would have final approval over the planning advisory committee membership. This situation has restricted public accessibility to the program, and has delayed some 208 program start-ups.

### Public Education

Table 16 indicates whether 208 agencies have received requests for briefing on the 208 program.

Table 16

#### PUBLIC REQUESTS FOR BRIEFING ON 208 PROGRAM

<u>Requests</u>	R E G I O N										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Yes	10	5	4	12	17	5	4	7	1	7	72
No	7	6	8	14	8	3	1	14	-	3	64
Total	17	11	12	26	25	8	5	21	1	10	136

At the time of the interviews, 72 agencies had already received requests from various groups for briefings about the program. Among the aspects agencies indicated the public would find difficult to grasp were:

- the nature of the 208 program itself;
- the concept of nonpoint sources of pollution;
- the relationship between land use and water quality;
- technical terminology;
- the management aspects of the program;
- coordination with other water programs such as Sections 106, 201, 208, 209, 303, and 402;
- the need for another planning program.

In response to this need, agencies were generally setting up public information programs similar to the one that appears in the Interim Output Handbook. At the time of the interviews it was impossible to obtain any meaningful data on how these techniques would be received by the public.

- Mailing Lists - Of the agencies interviewed, 121 have already begun to establish mailing lists of interested individuals and groups in their regions. In some cases, these lists are nothing more than the parent agencies normal mailing lists with a few additions. In other areas separate mailing lists for those people, groups, and agencies concerned with the 208 program are being established. The remaining agencies will be compiling mailing lists as soon as they get underway.
- Newsletters - 60 agencies at the present time have newsletters which are carrying articles about the 208 program. Several of these newsletters will be solely for 208, while the majority of the 208 agencies will utilize the parent agency's newsletter. The agencies that have not already prepared articles for newsletters intend to do so.
- Planning Brochures - 25 agencies currently have a planning brochure describing the 208 program, and another 77 agencies intend to publish one at a future date.

- Briefings for the Public - Public meetings and hearings will be used extensively throughout the 2-year process. Each agency was required to hold a public hearing on the designation of the area, and since that time, 70 agencies have already held public meetings to discuss other aspects of the program. 53 project directors or other senior staff members have already given speeches before a wide variety of public and private organizations. To assist at these briefings, 19 agencies have developed slide-show, movies, and multi-media presentations, and an additional 92 agencies have indicated that they intend to utilize some form of audio-visual aids in making presentations about 208. 15 exhibits have been developed thus far, while an additional 61 agencies said that they would be developing them in the future. A few agencies have also recognized the advantage of having contact with citizens in an informal atmosphere as well. For example, one agency currently has brown bag lunches weekly to which any interested person is invited to come and have lunch with the 208 staff.
  
- Media Relations - Certainly one of the primary mechanisms by which the Level III public and others will be kept abreast of the development of the 208 program will be through the mass media (newspapers, radio and television). 87 of the agencies have already received some newspaper coverage, 51 agencies have been covered on the radio, and 35 agencies have had exposure on television. One COG uses its own weekly radio show; several television stations have expressed interest in preparing documentaries on local 208 programs.
  
- Documentation and Depositories - Presently, 18 agencies have established 208 depositories for public use. 61 additional agencies said that they intended to establish such a system in their areas.
  
- Miscellaneous - Several areas are currently offering tours of their regions for the public, while others have formed speaker bureaus.

### Public Input and Feedback

Some agencies indicated their intentions to create public input and feedback systems. However, only a limited number of them were underway at the time of the interviews. This can be understood in light of program start-up delays being encountered across the country. Despite this fact, however, there was a noticeable lack of commitment

directed toward planning and decision-making feedback when compared with the information dissemination systems. Without including effective mechanisms for obtaining feedback, some public participation efforts will be noticeably weak. This would result in difficulties with plan implementation, as well as the loss of an opportunity to increase public awareness of water quality problems.

The techniques most often cited for obtaining public input and feedback are:

- committees
- liaison with citizen groups
- public meetings and hearings
- surveys
- seminars
- workshops

Initial feedback from the public has uncovered several issues which will have to be dealt with by the 208 agencies. These are:

- the role of the citizen in decision-making process
- the extent to which economic interests will be considered (i.e. agricultural interests, logging, etc.)
- the potential loss of local autonomy by local governments
- the nature and extent of land use controls (i.e. regulation v. private property rights)
- the relationship between 208 and 201
- who is going to pay for cleaning up existing nonpoint sources
- what is public acceptance of the plan

### Problem Areas

A program of the nature and extent of 208 will not go unattacked by all elements of society. 208 programs will be opposed in a number

of areas\* by ultra-conservative groups, home-rule advocates and economic interests that feel threatened by the implications of the program.

A large portion of the initial opposition can probably be attributed to a lack of understanding about the program. This was true in the case of several states who initially opposed the program. Hopefully, many of the groups that are now in opposition to the program will become aware that they can have a role in the process and input into the final plan system. Other groups will undoubtedly remain in opposition to the program, throwing up obstacles before the 208 agency at every available opportunity.

In addition to vocal opposition to the 208 program, there are a few major problems which will have to be dealt with. First, public participation will be a very time-consuming activity. Second, traveling distance will be a problem in some areas. In a few remote 208 areas, committee members might have to miss two working days in order to attend a routine advisory committee meeting.

Finally, devising effective techniques for combatting public apathy is sure to present problems for many of the 208 agencies. This chapter has described many public participation techniques, but their mere use does not insure effective public participation.

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\*The question of the role of environmental groups in 208 planning was not addressed, and did not arise in the discussion of potential opposition to 208 planning. Whether this is because there is not opposition at this time by environmental groups or that it was not considered in the context of the "opposition" question is not clear.

## BUDGET

### Findings

Information on 208 agency budgets was difficult to obtain at the time of interviews because most projects were in early stages of planning at that time and because EPA had not stipulated or disseminated guidance for standardized budget preparation. However, several important issues did emerge during the course of the study:

- EPA Regional guidance on funding adjustments resulted in indiscriminate cutbacks across agency budgets in some areas. Such action was a source of conflict between several 208 agencies and their respective EPA Regional offices.
- Misinterpretation of EPA Headquarters directives on funding eligibility sometimes resulted in bans on particular work tasks, particularly modeling and monitoring.
- On a national average, 208 agencies intend to contract out below the 75% ceiling suggested by EPA.
- Should EPA need to perform a nationwide study of 208 budgets, it will have difficulty in doing so due to the inconsistent format of individual agency budgets.

### Grant Awards

EPA was authorized by Congress to obligate a total of \$250 million for 208 planning in FY 1974 and FY 1975. Headquarters succeeded in committing \$163 million within the given deadline, but not always according to 208 agency requests. Table 17 indicates the number of agencies with discrepancies between grant amount requested and awarded.

Table 17

## DISCREPANCIES BETWEEN REQUESTED AND AWARDED GRANT AMOUNTS

Amount	Number of Agencies Registering Discrepancies	
	<u>Increases Over Request</u>	<u>Decreases From Request</u>
\$ 0- 1,999	1	1
2- 9,999	6	7
10- 49,999	5	15
50- 99,999	1	9
100-999,999	5	35
> 1 million	-	7
Total	18	74

Over 60% of funded agencies received less than their original grant requests while 15% were awarded sums in excess of their requests. Increases were generally small, clustering within a median range of \$10,000 to \$50,000. Decreases were generally far more substantial, with 35 agencies registering cutbacks of \$100,000 to \$900,000 and 7 agencies with reductions in excess of \$1 million. 57 agencies received the amount of grant requested.

Reasons for discrepancies between requested and awarded grants seem to follow two general patterns. The first reflects a Regional policy decision to fund a number of smaller planning efforts rather than concentrate money in a few major programs. This can be seen as an attempt on the part of the Regional office to achieve an equitable distribution of funds. The second is that Regional staffs made adjustments to original grant estimates after reviewing work plans and budgets.

Three out of the ten Regions tended to resolve funding issues through general cutbacks across the board. In the majority of cases, however, line items were either reduced or eliminated to comply with regional policy stands. Among those line items most frequently affected were water quality and land use data collection and municipal facilities related work. Resolution of discrepancies reflect regional office interpretations of EPA Headquarters directives.

Most local agencies were able to adjust to funding changes without difficulty. In a few isolated cases, however, reductions generated feelings of animosity toward Regional EPA offices. This occurred when local agencies felt EPA misled them to believe that their original grant request would be forthcoming, only to find that line items or grants were later cut back to a point where the 208 agencies felt they could no longer undertake an effective planning program.

More EPA sensitivity to local problems and/or a better explanation of federal policy are needed to alleviate misunderstandings in the future.

#### Work Plan Budget

Of the 136 agencies interviewed, 121 agencies had budgets available for review and discussion. They were generally prepared by 208 staff with EPA and/or state guidance. The 15 remaining agencies did not have budgets available at the time of the profile study; some were revising due to budget cuts. Half of these 15 were clustered in one region with the remainder spread out among three other regions.

The available budget information was nationally inconsistent in format due to the absence of standardized budgetary guidance from EPA. In a few areas where states took it upon themselves to circulate model budgets, there was a noticeable increase in budget format consistency. Uniform budget format would make comparisons among agencies and across regional lines much more feasible without restricting the 208 agencies' choice of goals, etc. This may be a valuable asset to EPA for overall program evaluation, both at the beginning and end of 208 and similar planning programs in the future.

A much more serious problem that arose in 208 budgets can be traced back to the procedure by which a number of designated agencies determined their grant requests.

In order to promote equitable national distribution of authorized funds, EPA Headquarters established a grant guidance formula based on the applicant agency's area population. This system was intended to be used as an estimate of total national funding - not as a formula for individual agency budgets. Some agencies, however, misunderstood EPA program guidance and relied on the population formula to determine their grant request, rather than making a concerted effort to identify program goals by task and dollar amounts. This situation suggests that some agencies did not have a clear



understanding of their local water quality goals at the time of grant award - a condition which has contributed to delays in program start-ups and could possibly jeopardize chances of reaching highest program goals.

Having recognized these possible trouble spots, EPA has issued a request for project control plans (PCP's) which will tie itemized workplans to specific tasks by dollar amounts. Regional offices generally expressed the hope that PCP's will check most potential problem situations before they get out of hand.

More detailed guidance from EPA Headquarters, stricter policy enforcement by EPA Regional offices and an advance on grant awards or a retroactive allotment of funds for budget preparation during the grant application period would help eliminate these budgetary problems in future EPA programs.

Almost all local agencies indicated that their budgets were either scheduled for intra-agency revision and/or possible modification through PCP's. Among the reasons cited for the tentative or incomplete status of budgets was first, insufficient time between designation and grant award in which the 208 agencies were to prepare detailed work plans itemized by tasks and cost. Another reason was the uncertainty of designation approval which caused some agencies to delay budget preparation until such time when they could be assured of funding and a return on their investment of staff time and agency funds. Funding the preparation of the budget was also a problem for many 208's since this expense had to be covered with general agency funds. Many agencies suffered from lack of available staff and the absence of agency expertise in cost and price analysis. Finally, confusion on funding eligibility of such line items as infiltration/inflow analysis and water supply studies, delayed budget decisions in some agencies.

In an attempt to compare budgetary allotments across the nation where standard budgetary categories do not exist, the study group delineated eight broad categories into which agencies were asked to translate their budgets. The categories were as follows:

Program management

Point and nonpoint source monitoring and sampling

Waste load allocations modeling

Technical sub-plan formulation and review

Municipal facilities related functions

Analysis of alternative management systems

Land use

Public participation

Interpretation of the categories listed was left to the discretion of the interviewee. Results, therefore, are not consistent.

Only 46 of the 121 agencies with available budgets were able to translate those budgets into the categories presented in the interview schedule. Seven agencies were able to make a partial transition by combining point and nonpoint source monitoring, modeling and technical sub-plan formulation and review into one aggregated item which they termed "water quality analysis and review."

Regional and weighted national averages for the available data are presented in Table 18.

Program management, monitoring, municipal facilities planning and land use seemed to receive equal weight in our partial survey, each averaging between 11 and 14% of total agency budgets.

Elsewhere in the interview schedule, agencies were asked for budget information on individual line items. These questions met with a higher response rate. Results showed an average of 12% of total budgets would be spent on management/institutional studies, 14% on land use and 8% on public participation.

Once again, the reader must be warned that the agencies interpreted the budget categories for themselves. The information gathered, therefore, may be inconsistent, with some extraneous expenditures hidden within major budget categories listed in the interview schedule. With these caveats in mind, the discrepancies between these figures and the standardized category tally can be explained by the broader sample represented in the itemized tallies. A number of agencies who were unable to use the standardized categories were able to quote figures on these particular budget items. The range of variation between the two sets of figures is minor, however, this suggests that either set gives a reasonable estimate of average budget allocations.

A few regional and/or state policies are revealed through patterns of budget allocations. The strongest patterns emerge in regards to monitoring and modeling, where it appears that a number of regions took Headquarter funding guidance too literally. Rather than temper efforts in these areas, some regional EPA offices tended to disallow them altogether.

In one area where Regional or state guidance was given on "reasonable" budget allocations by item, a consistent dollar amount was set aside for public participation programs. This later situation suggests that 208 agencies were willing if not eager to follow reasonable, locally sensitive guidance, particularly in non-controversial areas. The same sentiment was expressed with regard to items requiring familiarity with cost and price analysis.

Table 18

SUMMARY TABLE: SAMPLE BUDGET ALLOCATIONS  
(Regional Averages)

	R E G I O N										Weighted National Average
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Number of agencies with budget	15	1	1	8	6	1	5	8	1	9	
Program management	13	10	5	13	13	9	16	17	20	11	13
Monitoring	-	8	10	14	15	9	-	-	8	8	12.5
Modeling	15	24	15	17	7	5	6	5	-	3	8
Sub-plan formulation/review	-	15	17	15	24	37	-	-	23	34	22.5
水 [Water Quality]	37	47	42	46	46	51	41	38	31	45	[42]
Management analysis/ selection	11	18	19	17	11	20	13	12	29	15	14
Municipal facilities	15	-	10	11	12	2	10	9	-	9	11
Land use	13	3	19	10	6	11	10	19	7	7	11
Public participation	11	2	5	6	9	7	9	5	7	7	8

Regional and National Averages are average percentages of individual agency budgets.  
Water Quality is an aggregated category.

The study team's general impression on budgets was that products would have been much more satisfactory, in terms of status and content, if better guidance and more funds had been available to the 208 agencies early in the grant application period. Well-formulated budgets at the time of grant award would have eliminated start-up delays and perhaps contributed to a better understanding of goals and scope of work at the project's initial stages.

## Contracts

A 1975 Headquarters directive suggested a 75% total budget ceiling on contract work to be carried on outside the 208 agencies. This ceiling excludes services contracted between or among 208 agencies. At the time of interviews, an intended national contract average of 58% was identified by 208 agencies - a figure well within the suggested limit set by EPA. There were, however, a significant number of agencies with contracts in excess of this mark.

Only 1/3 of the 136 agencies interviewed had detailed contract lists. Most of these were still subject to change contingent upon possible workplan revisions. 10% of the 136 agencies had not begun outlining a contract list. Reasons given for the preliminary status of contract lists include the status of workplans, and difficulty in cost/price analysis. In at least one case, there was a sensitive political situation wherein member jurisdictions perceived a threat to their self-determination in the face of a strengthened regional planning agency.

Only 2% of intended contracts had been let at the time of interviews. These contracts generally involved minor program tasks with a scattering of contracts for workplan revisions. Regional EPA offices were generally delaying finalization of contract agreements until PCP's were completed; agencies were clear on their goals and the scope of work before they begin spending their money.

In most instances, decisions on whether to do work in-house or by contracts were made by the 208 agencies themselves. Outcomes generally reflect technical expertise within the agency itself. Some guidance on contracting was usually provided by EPA or the state, especially in the case of new or small agencies with little or no past experience in water quality planning and analysis. Guidance was also provided in instances where agencies had difficulty in cost and price analysis on contract arrangements. In some cases, states encouraged joint contracts among 208 agencies with common problems.

15 agencies indicated that they would be contracting out over 75% of their total budget; with 2 agencies planning for more than 90% contract work. Size did not seem to be a controlling factor in contract decisions. Two agencies with similar large grant awards, for example, chose directly opposite approaches. One committed 90% of its budget to contract work; the other only 10% of its total.

The decision on whether to contract out appeared to depend on the 208 agency's expertise in the type of work it chose to undertake rather than its size. Faced with highly technical, water-related tasks, local 208's tended to go outside their agency since experienced personnel were difficult to find and equipment was often prohibitively expensive to acquire. Land use on the other hand was usually left in-house since most regional planning agencies, COG's, etc., have had prior experience in this field.

### Contract Activities

53 agencies indicated that they would contract for facilities-related work. No differentiation was made between direct municipal facilities planning and 201/208 coordinating activities. The general trend, however, was to contract out for technical/engineering information and then coordinate policy planning in-house.

58 agencies indicated that they would issue contracts for monitoring and sampling. Although many regional planning agencies and COG's do water resource planning, water quality planning is traditionally within the realm of state agencies or consultants. For many 208's, therefore, contracting out for monitoring and sampling was the most reasonable approach since staffing and equipping 208's would be both expensive and would not necessarily insure more accurate results.

50 agencies indicated they would contract for modeling-related work, with state water quality boards and the USGS cited as the most likely choices. Preliminary budget information indicated that only a small amount of individual agency budgets would be spent on modeling in most cases. This suggests that most efforts are being concentrated on the use of existing models - generally from the state with some use of university systems. There were a few cases where strong disagreement between local 208 agencies and their respective EPA regional offices arose when EPA refused to fund extensive modeling efforts. Some of these remained unresolved at the time of interviews.

22 agencies indicated that they would contract for at least part of their public participation program. Options mentioned ranged from major contracts (11) which entailed total program management to small contracts for individual tasks such as public opinion surveys. Although some agencies had not yet decided on the nature of their public participation program, the general trend was to undertake as much public participation work as possible in-house. This decision was prompted by the agencies' familiarity with their member jurisdictions.

42 agencies intended to contract for land use work. The nature of contracts ranged from major areawide plan formulation to supplementary data collection, graphics and aerial photography. Many 208 agencies indicated their intention to contact local or county governments since land use data was already available there or in the process of being collected.

70 agencies were seeking outside assistance in management and/or institutional literature searches, plan development and analysis. In several states, 208 agencies were either directly entering joint contracts for such services or were contributing to the state management and coordination funds to carry out such projects.

At least 18 agencies noted that they intended to hire lead contractors who would have responsibility for subcontracting elements of major program tasks. This is not to imply that all 18 were relinquishing total program management to a consultant.

Some did issue substantial lead contracts which represented a transfer of program management, particularly in technical areas, to a contractor. In a few cases, lead contracts were issued for workplan and budget revisions, a most influential task-affecting total program scope and direction. However, most lead contracts involved only 3-4 subcontracts. In such cases, agencies simply found it more convenient to rely on a major contractor rather than worry about complicated and cumbersome minor contract arrangements.

### Type of Contracts

Among over 300 tentative contracts mentioned, a total of 137 were intended for engineering type firms. Of these, 79 were specifically slated for architectural and engineering companies and primarily involved facilities planning, storm water and combined sewer studies; 22 were intended for engineer/planning firms and 36 were labeled environmental engineering contracts. The latter usually involved broader water quality studies.

Planning firms were only mentioned in 37 contract proposals. These were primarily related to population projections and land use.

Management consultants were noted in reference to 62 intended contracts. Most of these involved management/institutional/financial studies rather than program management. The latter contracts were usually delegated to engineering firms since so much of 208 planning involves highly technical work.

Seventeen individual lawyers and/or legal firms were cited as were 11 public opinion-type contractors. About 29 undefined water quality consultants - usually biologists, testing labs or environmental research groups - were also listed as potential consultants or contractors, including 6 contracts to universities.

A total of 82 contracts were intended for government agencies or jurisdictions. Twenty state contracts - primarily for water quality monitoring and analysis, facility studies and management arrangements - were to be arranged with water quality offices, labs, etc. Nineteen contractual arrangements were outlined for 201/208 coordination, assistance, land use data and sub-plan formulation and capital improvements planning. Thirty county contracts were also noted

primarily in the West and South. These contracts were geared toward tasks similar to those intended for local agencies, with the notable exception of a higher preponderance of legal/management/institutional work. An explanation may come from the fact that many of these same areas were considering regional management solutions, a subject area in which county governments may have the most knowledge and understanding. Finally, at least 13 federal agency contracts may be issued under 208 with the U.S.G.S., Soil Conservation Service, the Army Corps of Engineers, and the Department of Agriculture Forestry Service cited for water quality-related tasks.

In general, it appears that 208 agencies are being prudent in their contract decisions. They recognize the need to strengthen agency staffs in those areas which are essential for program continuity and plan updates. Yet with the forewarning of EPA regional staff, they have generally recognized the advantage of limiting contract work so as to retain control over program direction and work scope. Outside consultants may be less interested in seeing a program through, less able to view the program as an integrated whole and less committed to plan implementation. This same situation exists with agencies that have hired staff for only 2 years. For these reasons, EPA should continue to counsel 208's against inordinate reliance on contractors, except in those cases where contracting is more reliable and economical. In the latter case, agencies must be particularly aware of that fine line at which they are apt to lose control of the program and jeopardize its success.

## TIMING AND FINANCIAL PROBLEMS

### Findings

Most agencies thought that two years was too short a time to adequately accomplish the tasks in their work plan. The most common problems mentioned were:

- Due to start-up time and the need to prepare a Project Control Program, 3-6 months is lost at the beginning of the 24-month planning period.
- Evaluation and approval at all levels takes an additional 3-6 months at the end of the period.
- When water quality or land use data must be newly developed, agencies will have difficulty completing other tasks that depend on that information.
- There is confusion as to what outputs are due after 2 years and what tasks can be carried over into on-going planning.
- Few agencies have seriously begun to consider management and implementation.
- When management was seen to require establishment of a new authority, lengthy delays to obtain legislative authority were anticipated.

Furthermore, most agencies expressed serious doubts that they could continue 208 planning on a totally financially self-sustaining basis. Recurring comments were:

- The local governments do not see a way to raise enough money on their own to sustain 208 planning.
- The local governments do not consider themselves bound by their resolutions-of-intent to pay for 208 planning after the grant runs out.



- Federal and State financial assistance is essential if 208 is to continue beyond two years.

### Timing and the Two-Year Planning Period

All programs were asked "Is the two-year planning period realistic?" The answer was a resounding "No." Programs were then given a list of 30 work task elements and asked which ones were not realistic within the two years, and how much more time would be needed. The list and results are presented in Table 19. One additional response was added to the list because it continually arose. Called the "Synergistic Effect", it refers to the situation that any one work task taken alone could be completed, but not all of them taken together within the given time period. The total is somewhat low given it was tabulated from isolated comments, and not a direct question.

The most common complaint was that programs do not really have two years. Over 2/3 of the programs mentioned that "start up" has seriously cut into their two-year period, on the average of about six months. This included such problems as hiring staff and administrative organization as well as getting contracts approved. All programs noted that the need for a detailed work plan and the Project Control Program (PCP) takes a minimum of 3 months from the 24-month period. It is useful to note that some of those agencies designated in FY '74 are no further ahead in this regard than the FY '75 designations. Many programs appear resentful of the need to prepare the PCP because they feel they already have an adequate work-plan that cost them considerable time and money to develop at their own expense.

Another common complaint about timing involves the building block nature of the program. Data analysis depends on data acquisition. Developing point and nonpoint source control plans depends on knowing the extent and sources of problems. Developing institutional and management plans depends on defining water quality plans. Thus, if one step does not meet schedule, all the others also fall behind. Over 35% of the agencies answered that data acquisition and analysis would be a problem, either because it is not available or it is not useful. Because most of the grant awards were made at the end of the fiscal year, agencies have lost badly needed data for summer low flow conditions and this data cannot be available again for 12 months. Such agencies therefore will have special problems in meeting the two-year deadline.

13% of the programs anticipated problems in meeting interim output deadlines both because data was not available and because of the lengthy process involved in seeking public approval.

Table 19

NUMBER OF AGENCIES ANTICIPATING PROBLEMS  
DURING THE 2-YEAR PLANNING PERIOD

T A S K	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Analysis of water quality factors	4	2	2	5	3	-	-	3	1	3	23
Review of appropriate institutions	-	-	-	-	3	-	-	1	-	-	4
Data acquisition	3	9	3	10	11	3	1	6	1	3	50
Data analysis	2	5	2	3	6	2	-	3	1	4	28
Review alternative controls	1	-	1	7	4	1	1	2	-	2	19
Alternative management agency	2	-	-	5	6	-	-	2	-	2	17
Selection of appropriate institutions	3	-	-	2	3	1	-	3	-	4	16
Selection of appropriate management plans	3	-	1	10	5	2	-	2	-	5	28
Development of point source sub-plans	-	-	1	-	2	1	-	1	-	1	6
Development of nonpoint source sub-plans	2	1	-	8	8	2	1	6	-	4	32
Plan evaluation	4	1	-	15	7	-	1	3	1	3	35
Plan review and adoption:											
Local	7	2	2	13	13	3	2	5	1	7	55
Advisory committee	2	-	1	5	5	3	1	1	-	1	19
Certification by state	2	2	-	6	3	3	2	3	1	1	23
EPA approval	1	2	-	5	2	2	-	1	-	2	15
Municipal facilities	1	-	-	2	3	-	-	1	-	2	9
Identification of urban stormwater controls	1	1	1	5	5	-	-	1	-	3	17
Construction priorities	-	-	-	4	1	1	-	2	-	1	9
Staffing	2	4	5	8	1	5	2	10	1	5	43
Administrative	3	3	3	7	5	2	1	6	1	5	36
Regulatory program	4	2	-	5	4	-	1	1	-	2	19
Identification of construction, operation, and maintenance agencies	1	1	-	5	3	-	-	-	-	1	11
Control of residual wastes	3	1	-	-	3	1	-	1	-	2	11
Implementation of schedule	4	2	-	8	3	1	2	2	-	-	22
Selection of management agency	3	1	1	12	4	1	1	2	-	2	27
Synergistic effects	-	2	1	-	3	2	-	-	-	-	8
Total	58	41	24	150	116	36	16	68	8	65	582

It is generally unclear what planning must be completed within the initial two years and what planning elements can take place after the two years. Most agencies believe that all outputs and plans will be due at the end of two years and believe they will have considerable difficulty achieving that goal. The local agencies seek EPA guidance on minimum acceptable plans and on the content of the continuing planning process.

There are serious barriers to meeting the two-year deadline for completion and approval of most plans even if the planning and analysis proceed according to schedule. 55 agencies felt that local review and approval of the plan would jeopardize meeting the 24-month deadline.

The development of a satisfactory management system will take much time, thought and discussion. Ideally, the 208 planning process should be producing interim management outputs throughout the two-year planning period prior to the final selection of a system. However, most 208 programs are not generating these outputs yet. Few agencies had seriously begun to consider management and implementation when the interviews were conducted, although most interviewees said they would begin management alternative analysis within the first year of their planning effort. It should be noted that 10 of the 23 agencies saying they would begin management analysis at day one were in one particular region where the Regional EPA office stressed the importance of addressing this problem early in the process. 15 others said they did not know when management analysis would start. Related to this is the fact that agencies did not yet know whether this work would be done in-house or by consultants.

Agencies were asked if the legal powers required of a management agency could be acquired prior to the two-year deadline. Table 20 presents the results.

Table 20

RESPONSE ON ABILITY TO ATTAIN LEGAL POWERS  
FOR MANAGEMENT AGENCY PRIOR TO 2-YEAR DEADLINE

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Yes	1	4	1	4	11	3	2	9	1	7	43
No	12	3	3	14	-	2	-	2	-	1	37
Don't know	-	-	-	3	12	1	3	-	-	-	19
No answer	4	4	8	5	2	2	-	10	-	2	37
Total	17	11	12	26	25	8	5	21	1	10	136

44% of the agencies responding answered yes; 39% answered no; and 17% did not know. Acquisition of legal authority was felt to depend on the controversiality of the plan and whether management would be primarily by the local governments, in which case little additional authority would be necessary. If the management system foreseen would include any kind of institutional rearrangement, and if, therefore, special state legislation would have to be passed, delays of up to two years were predicted.

Most agencies felt they would be well into year two before a management plan was devised and that at least two sessions of their state legislatures would be required to secure legislation or constitutional amendments. Many legislatures meet only once every two years, and many were characterized as conservative by the 208 agencies. There did not seem to be any distinction between agencies that were COG's or RPA's and those that were other types of planning bodies, such as county planning departments or economic development districts. Even the one state planning agency designated felt that the necessary legislation could not be obtained in two years.

### Financially Self-Sustaining Planning Process

Section 208 provides funding for a two-year planning period. It authorizes the Administrator to make grants to designated agencies for the costs of developing and maintaining an ongoing areawide waste treatment management planning process. However, since no funds have been allocated for the continuing process as of this time, 208 agencies must find a way to totally finance their own programs after the two-year period expires.

When the agencies were asked if they expected problems in establishing a financially self-sustaining planning process, 92 responded affirmatively, and only 27 negatively. There were no meaningful distinctions among the different types of 208 agencies in how this question was answered.

The designated agencies were then asked which of the following methods they were expected to use to fund a continuing 208 program: contributions from participating agencies on local governments, general revenue fund allocations, user charges and general obligation bonds.

Most did not expect success in obtaining increased funding contributions from participating agencies or governmental units sufficient to support continued planning. The other three methods suggested were seen as only slightly more feasible for financing 208 planning.

Resolutions of intent were mentioned by several agencies as signs of commitment on the part of their governments to an ongoing planning process. The locals do not view the resolutions as binding them

to pay for 208 planning after the initial two-year period expires. In light of the budget crisis cited by many designated agencies, and the fact that 107 of the 136 agencies interviewed said they would not have participated in 208 had there been only 75% funding, financially self-sustaining 208 planning may be totally unrealistic.

Federal contributions are felt by the designated agencies to be absolutely essential if 208 is to be the ongoing process it was intended to be. Some financial assistance from the states is hoped for and at least one state has already agreed to provide it. If financial aid is not forthcoming, the 208 agencies will be forced to drastically lower their water quality goals or drop the program altogether.

## DESIGNATION AND GRANT APPLICATION

### Findings

The data gathered on the designation and grant application processes provides an insight into some of the problems forthcoming in the planning process. Additionally, it highlights problems to avoid with next year's applications. Briefly stated:

- Agencies have been either unwilling or unable to produce detailed workplans before grant award. Allocating a portion of the grant for workplan development would greatly expedite the presently overloaded planning process.
- The requirement of obtaining resolutions of intent has been administered inconsistently by the Federal Regions. Many local governments are unwilling to bind themselves to plan implementation at this time.

### Why Enter 208 Planning?

The desire to enter 208 planning can be attributed to several factors. Local agencies were understandably enticed by a program offering 100% Federal funding. Most saw this as an opportunity to undertake planning efforts which they could not otherwise afford. This was clear from the fact that the majority (79%) would not have applied for the grant on the basis of a 75% Federal share.

An equally important factor was the desire to prevent the state from undertaking such planning. Most localities, seeing this as a possible alternative, chose to keep the planning locally based. An additional incentive was the belief that future Federal grants, in particular 201, would hinge on 208 planning.

### The Designation Process

145 of 149 agencies were designated by governors. Four agencies were self-designated. These are Charleston, West Virginia; Washington Metro; Lakes Region, New Hampshire; and Salem-Rockingham, New Hampshire. Self-designation has not proven an impediment thus far. There is a wide range in total time taken for designation. The results are presented in Table XXIV.

Table 21

## TOTAL TIME OF DESIGNATION PROCESS\*

Time	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
< 1 month	-	-	1	1	-	-	-	-	-	-	2
1- 4 months	1	8	3	7	7	4	-	8	-	1	39
4- 8 months	8	-	3	6	10	2	1	9	1	1	41
9-12 months	4	1	1	3	2	1	2	2	-	3	19
12-15 months	3	1	-	6	1	-	-	1	-	3	15
7-15 months	1	1	1	2	5	-	2	-	-	2	14
No answer	-	-	3	1	-	1	-	1	-	-	6
Total	17	11	12	26	25	8	5	21	1	10	136

\*In some cases could not be separated from grant application process.

Two agencies completed the process in less than one month, while 29 agencies took over one year. The majority of agencies (80) were designated in the range of 2 to 8 months. Although this is a reasonable amount of time in the majority of cases, it is in part due to administrative expediency at the end of FY 1975. The 21% which took over one year were for the most part those who applied for designation early in the process. They were generally held up either by lack of guidance at the local level or by indecision at the Federal level.

#### Preparation of the Designation Package and Grant Application

The designation materials were prepared by the agency staff in 120 cases. The remaining 16 were prepared either with or solely by consultants. This breakdown is generally the same for the grant application process. 101 agencies prepared the grant application in-house. Ten were written by consultants, and twenty-five were developed jointly.

#### Problems in the Designation and Grant Application Processes

Designation and grant application requirements were often fulfilled simultaneously, or in overlapping time periods. The following figures represent difficulties encountered during both procedures. Results are presented in Table 22.

Table 22

## AGENCIES WITH MAJOR PROBLEMS IN THE DESIGNATION AND GRANT APPLICATION PROCESS

P R O B L E M	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Lack of local agency desiring to do 208 planning	-	3	-	2	-	1	1	4	-	-	11
Lack of interest or cooperation from the State	3	5	3	4	9	1	2	4	1	4	36
Lack of interest or cooperation from the Regional office	-	1	2	1	2	-	3	1	-	-	10
Dispute over appropriate boundaries for 208 area	5	1	1	10	5	3	-	3	-	7	35
Absence of legal authority to do all or part of 208 planning	1	1	-	1	2	-	-	4	-	1	10
Delays in eliciting other local agencies to cooperate with 208 planning	2	1	-	7	6	1	2	5	-	3	27
Delays in organizing interstate cooperation (where applicable)	4	-	-	4	3	1	1	-	-	-	13
Delays in obtaining resolutions-of-intent from local governments	10	1	2	11	7	2	1	10	-	3	47
Lack of technical knowledge about local water quality problems	3	2	1	7	3	-	2	7	-	4	29
Lack of staff	6	3	1	12	7	2	1	8	-	7	47
Lack of funds	11	2	4	10	7	1	3	8	-	7	53
Confusion regarding the designation requirements and/or estimated cost of the 208 study	9	5	2	14	6	1	4	5	1	5	52
Public disinterest in or hostility toward 208 planning	4	2	2	6	3	-	2	1	-	2	22
Others?	-	-	1	1	-	-	-	2	1	-	5

\*Total is greater than 136 due to multiple responses.



The major problems resulted from the framework of the processes themselves in addition to difficulties which generally accompany the inception of a large Federal grant program. Difficulties resulting from the framework are the development of a detailed workplan before grant award and the legal aspects of the resolutions of intent.

The cost of developing a detailed work program was apparent with 100 agencies reporting difficulties resulting from lack of staff or lack of funds.<sup>1</sup> Over one-half of these agencies (52) said they were confused about requirements and/or estimated cost of the 208 study. The result of this has been a request for revisions of work plans throughout the country.

It is understandable, even with adequate funds to prepare the application, that an agency would be wary of a large investment with no guarantee of a grant. At least 17 agencies applied for FY 1975. funds and were not awarded grants.

An alternative policy of letting out a % of the grant after designation (or retroactive payment) for thorough workplan development would eliminate much duplication and wasted effort. This year's experience has enabled EPA to clear up the guidelines/requirements of designation and grant application. These procedural improvements should insure the planning process begins on receipt grant award.

#### Resolutions of Intent

The requirement of resolutions of intent from jurisdictions in 208 areas was met in varying degrees across the nation. The original requirement of "all participating jurisdictions" was loosened to "workable" for planning and implementation; a consensus on the definition did not emerge. In some cases, the resolution requirement was filled by a letter from the governor guaranteeing the use of the police power to implement the 208 plan.

29 agencies plan to acquire a total of 80 additional resolutions not obtained prior to grant award. This figure veils a number of agencies who feel that the grant award completes designation process and therefore they need not pursue additional resolutions.

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This figure may be slightly inflated due to dual responses.

There was a significant difference in the administration of this requirement by the Federal regions. Some Regions remained stringent from 90 to 100% requirements. Interpretations include all jurisdictions with population over 5,000, the major jurisdictions and "anyone who would give them." In some cases, no resolutions were obtained prior to designation, and had yet to be pursued at the time of the interview. These cases were covered by letters from the governor. Given the need for local approval of a 208 plan, this approach seems to circumvent the purpose of obtaining resolutions.

EPA's attempt to get assurances that the local jurisdictions are aware of 208 planning, and that local circumstances are favorable to 208 planning and implementation of 208<sup>1</sup> often was not fulfilled by the requirement for resolutions. A common local reaction to requests for resolutions was fear of giving blanket approval to a plan yet to be made - a reasonable deduction from the resolutions' use of the word implementation. Refusal in other cases was the reflection of local political jealousies and problems that in the end had no direct bearing on the planning and implementation of the 208 program. It is also somewhat inequitable that some agencies were made to go to great lengths to obtain the majority of resolutions, while in a few instances the issue of resolutions was simply passed over.

#### Cost of Grant Application

The range of costs incurred by 208 planning agencies in preparation of grant application reflects the problems resulting from requiring considerable expenditure prior to grant award. The results are presented in Table 23. The cost<sup>2</sup> ranged from less than \$500 to \$75,000. The cost to the majority (56) of agencies was between \$1,000 and \$10,000, although a significant number (34) spent over \$10,000 but less than \$50,000. Once again, the difference of investment is apparent, and would be remedied by a % of the grant allocation for workplan development. Aside from costs, however, 90 agencies replied that grant applications requirements were reasonable in light of their local situations.

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<sup>1</sup> AM-4, April 3, 1975

<sup>2</sup> Designation costs could not be separated in some cases.

Table 23  
COST OF GRANT APPLICATIONS

Cost	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
< \$ 500	1	-	-	-	-	-	-	-	-	-	1
500- 999	-	-	-	2	1	-	1	1	-	-	5
1,000- 4,999	9	1	1	12	2	-	-	2	-	1	28
5,000- 9,999	4	-	4	5	4	-	2	4	-	5	28
10,000-14,999	2	2	1	-	4	-	-	3	-	2	14
15,000-24,999	1	2	1	1	4	1	-	-	-	-	10
25,000-49,999	-	-	1	-	6	1	1	1	1	1	12
50,000-74,999	-	1	-	-	1	-	1	-	-	1	4
> 75,000	-	1	1	-	-	-	-	-	-	-	2
No answer	-	4	3	6	3	6	-	10	-	-	32
Total	17	11	12	26	25	8	5	21	1	10	136

NOTE: These often would not be separated from designation preparation costs.

It is interesting to note how some of the grant applications were paid for\*. In 8 regions, HUD 701 assumed at least part of the cost of grant applications. In other cases, cost was assumed by private foundations, states, consultants, or individuals devoting their own time. In many cases, the funds were from contributing local jurisdictions.

#### Assistance and Coordination

In the designation process, 36 agencies reported a lack of interest and/or cooperation from the state; while only ten had difficulties with the Regional office. In the grant application process, 24 agencies reported difficulties with the EPA Regions. Often this was the result of disputes over level of funding. Only 26 agencies had difficulties with the state. One problem was continual requests for revision of documents--often the fault of unclear guidance on allowable tasks; for example, infiltration and inflow analysis and modeling. Another was simply the slow process of establishing effective administrative relationships on the part of both the States and EPA regional. Apparently, some Regions were inconsistent in designation due dates which added to the problems of designated agencies. Aside from administrative problems, actual assistance in the preparation of the applications was forthcoming from both the states and the regions. This varied from minimal assistance to actual development of applications. 113 agencies reported assistance from the Federal Regions, while 81 agencies received help from their states.

\*This was not an interview question, but was continually referred to. It, therefore, cannot be developed as a national statistic.

## COORDINATION

### Findings

Looking at the different planning programs and mechanisms of coordination provides a brief overview of existing and potential coordination between the 208 agency and other institutions or planning programs. Several key issues surfaced:

- The local 208 agencies need clear guidance on the substance and timing of 208/201 coordination.
- The role of state planning and the mechanisms for state/local coordination need to be clarified.
- Those 208 agencies located within multi-functional planning agencies have the greatest potential for programmatic coordination.

### Coordination Between 208 and 303(e) Basin Planning<sup>1</sup>

The State 303(e) water management plans are an essential input to the 208 planning process:

- Water quality goals and standards
- Definitions of critical water quality conditions
- Waste load allocations

These inputs to the 208 planning process are to provide a sound base upon which the 208 programs will be built, yet as of March, 1975, only 50 of the 500 303(e) plans were complete. It was apparent, however, that those 208 agencies in areas where 303 plans were of poor quality, behind schedule or non-existent, were at a disadvantage.

For example, some states viewed 208 planning as an alternative method for developing the 303(e) information, and were waiting for outputs from the 208 process for their 303(e) plans.

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<sup>1</sup>

Complete information on the 303(e) Plans could not be obtained as in many cases the agencies had not obtained or analyzed them. Answers reflect general discussions on the status of 303(e) Plans and could not be statistically tabulated.

Another example of difficulties obtaining state water quality information occurred in areas where 303(e) plans were non-existent and agencies had to rely on 3C plans where available. To what extent information generated under the 3C program could be substituted for the 303(e) inputs was a question agencies in the State had only begun to consider. Determining what information can be used and what new information must be generated will slow down the 208 planning process.

#### Coordination Between 208 and the NPDES

Approximately 80% of the agencies interviewed had made at least preliminary contact with the State NPDES agency. 53% of the agencies had actually obtained lists but only 30% of the agencies had actually reviewed the permits to see if they meet their 208 planning needs.

Specific plans for coordination between the 208 and 402 programs were difficult to obtain, in part because of the variety of ways by which the 402 program is administered. In some cases, 208 agencies could deal directly with their respective states to obtain permit information. In other instances, permits are administered by EPA through the states. In such cases, agencies were uncertain whom to contact. This is critical because the National Pollutant Discharge Elimination System permit program will provide an essential tool for the implementation of the 208 plans. Permits issued are to be in concert with approved 208 plans.

#### Coordination Between 208 and 201 Municipal Facilities Planning

Agencies have indicated their intention to allocate an average of 14 to 15% of their total budgets to carry on municipal facilities planning and review to the best of their ability. Approximately 95% of the agencies said that 201 municipal facilities planning and/or construction was ongoing in their 208 area. Just under 80% stated that they felt existing 201 plans were in concert with their anticipated 208 planning effort, but this finding must be interpreted with caution. The response often appeared to be based on incomplete knowledge of existing 201 planning efforts.

Most agencies interviewed were not sure of the programmatic and timing relation between 208 and 201 municipal facilities planning and, consequently were hesitant to make specific plans for coordination until more guidance was available. Two observations seem to characterize the situation of the locals. First, the original draft guideline did not detail the programmatic relationship between 208 and 201. Secondly, more recent guidance cautioned the 208 agencies not to slow down the 201 construction process. Most agencies recognize the need to avoid delaying the 201 process but more specific guidance on establishing coordination between the programs appears warranted.

### Coordination With Other Environmental Programs and Other Areawide Planning Programs

Various environmental programs in regional planning agencies are provided with an excellent opportunity for coordination. Most interviewed felt that the ease of in-house coordination would be mutually beneficial to their ongoing programs.

29 of the 208 agencies interviewed stated that they either were air quality maintenance areas or overlapped with them to some extent. 62 agencies have either completed or are currently working on solid waste plans as providing them with background and experience to enter the 208 planning process.

### Coordination Between 208 Agency and the State

Nearly all the agencies said they had made contact with their state's water quality office, yet only half of them indicated that some sort of coordination plans were established. These were most often in the form of a state coordinator or participation in the technical advisory committee. Some state personnel were to be supplied to 208 agencies through coordination and technical assistance contracts. Between 4 and 8% of the planning grant was available for this type of contracting with the state. The content of the contract was usually described in a general nature but ranged from extensive technical services, involving more contract money, to providing data format specifications to standardize the input to the state planning program.

### Means of Coordination with Other Governmental and Other Planning Programs

Most agencies did not have well developed mechanisms for coordination with other agencies and related programs. At the time of the interview, most established coordination focused around information exchange. Coordination involving more specific work task elements was usually in the planning stage.

The committee structure was the most commonly mentioned means for achieving coordination. It serves a vital function by providing a form of umbrella coordination, allowing direct communication among representatives of many groups. Representatives of related programs and interest groups hold seats on 208 advisory committees and in turn 208 staff occasionally hold seats on advisory committees of other programs. A parent agency often provided its 208 agency with a skeleton of a citizen advisory or technical advisory committee, or at least provided the channels for assembling them. Sometimes regional sub-committees were formed in the larger 208 areas where long, difficult drives might discourage regular attendance.

Frequently mentioned mechanisms through which information was exchanged with the 208 agencies are inter-program staff meetings, newsletter exchanges, A-95 Clearinghouse review and comment procedures, and accessibility of the in-house planning expertise in a multiple function parent agency. The availability of a common data base or common population and land use projections from other planning organizations was mentioned as a good opportunity for planning coordination.

Contracts for specific tasks were often mentioned as providing coordination between the contracting parties. For example, the Soil Conservation Service has several contracts to provide 208 agencies with soil analysis and will thereby become involved with the planning process. In cases where studies are done over an area larger than the 208 area (e.g. aerial photography), the 208 agency contracts for only that portion of the study relevant to the planning area. A benefit seen is the potential for coordination with areas outside the 208 area. Some 208 agencies are contracting with municipal facilities management agencies and engineering firms in the facilities business to aid coordination between the 208 and 201 programs.

Contracting was often said to be part of the coordination with other 208 areas. 208 agencies in at least two states are joining with the other 208 agencies in the state to hire a single consultant for specific work tasks. In another instance, several 208 agencies have contracts with a single 208 agency to provide them all with results of a study on a common problem.

The following table is interesting because it shows the broad range of programs and agencies that must coordinate in some manner with the 208 program. All 208 agencies were asked to complete a table listing agencies that had been contacted and methods of coordination. Figures are understated for two reasons. First, the methods column contained no cues, thus the answers were all volunteered and often general. Second, no consistent distinction was made between methods in existence and anticipated methods. Some respondents chose not to answer if they were either uncertain or if no formal means of coordination had been established.

Although the figures are incomplete, the table is useful because it shows both the large number of programs that must be coordinated and it shows the relative frequency of methods of coordinating that will be used.

Table 24

NUMBER OF 208 AGENCIES WHICH MENTIONED THE METHODS OF COORDINATION  
USED IN RELATION TO THE ORGANIZATIONS LISTED

O R G A N I Z A T I O N	M E T H O D S									
	Contacted but not Specified	Committee	Contract from 208	Contract to 208	Information Exchange	Joint Studies	Memos, Agreement, Correspondence	Staff Sharing	A-95	In- House
Air Quality	30	23	2	-	7	1	4	8	-	8
Solid Waste	27	29	4	1	8	4	4	10	-	21
Transportation	29	21	2	-	7	2	5	13	1	21
Coastal Zone Management	15	13	3	1	2	2	1	3	-	6
Corps of Engineers	21	26	4	-	5	3	9	4	-	1
U.S. Forest Service	16	51	2	-	8	2	9	10	1	-
Soil Conservation Service	16	47	2	-	9	1	6	5	2	-
U.S. Geological Survey	3	8	5	-	3	2	4	3	-	-
Housing, Urban Development	1	-	1	-	-	-	-	1	-	-
National Park Service	-	8	-	-	1	-	-	-	-	-
EPA	1	6	1	-	1	1	-	1	-	-
Other Federal	15	14	3	-	3	6	3	4	-	2
State	10	62	3	-	7	2	6	5	3	1
Local	9	43	4	-	2	1	11	5	1	-
Regional	1	-	-	-	-	-	-	-	-	-

Note: Methods are not mutually exclusive.



## EVALUATION AND GUIDANCE

### Findings

The major findings on evaluation and guidance are listed below.

- There is a serious delivery problem with EPA guidance to date. A significant number of agencies never received handbooks while a fair proportion received them too late to be useful.
- Technical guidance needs are similar throughout the country. The top four were consistently: nonpoint source analysis, monitoring (point and nonpoint), urban storm water, and combined sewer analysis.
- The most requested management/legal/institutional seminar is state-enabling legislation outlining alternatives for a successful management agency. Ideally, this would be given by the states with proper guidance from EPA.

### Section 208 Draft Guidelines

The Guidelines were the only consistently available guidance for those agencies seeking a 208 designation. They were considered useful by 101 agencies. The value of the Guidelines was primarily for background information on the 208 process (educational), rather than effective program guidance.

### Designation and Work Plan Handbooks

The need for timely guidance is evidenced by the variety of problems previously discussed in both the designation and grant application processes. It appears that the problem rests with the delivery as opposed to the substance of such guidance. Thirteen agencies never received the Designation Handbook while seven never received the Work Plan Handbook.

61 agencies received the Designation Handbook too late for it to be useful in the process. 45 agencies received the Work Plan Handbook equally late.<sup>1</sup> This reflects a serious delivery problem occurring at certain Federal Regions, as well as a wasted effort in developing guidance for the majority of agencies able to make headway on their own. Some agencies received the handbooks through informal channels. Examples include "given by consultants", "copying another agency's copy", and "picking it up on a trip to Washington, D.C." An improved regional distribution system or a policy of direct mailings should prove a useful step toward improving the delivery of guidance.

## Workshops<sup>2</sup>

The EPA workshops were received with mixed reactions. The figures available indicate the number of workshops attended by each agency.

Table 25  
WORKSHOP ATTENDANCE BY AGENCY

<u>Number of Agencies</u>	<u>Number of Conferences Attended</u>
19	0
52	1
43	2
9	3
11	N/A
2	Don't know
<u>136</u>	

Unfortunately, the majority found the conferences only marginally useful. Some stated that the information was not up-to-date or generally not helpful. Others were further along in the process than the subject discussed. Reasons for not attending were that they were unaware of workshops, or that the workshops were too far away. An indirect

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<sup>1</sup> Does not include FY '74 agencies, as handbooks were not published.

<sup>2</sup> All meetings on 208 will be discussed together, as most agencies could not distinguish sponsors, or particular subject matter. Therefore, the most that could be obtained was general impressions.

benefit of the conferences which frequently emerged was the informal contact with other 208 agencies. Exchange of information on that level proved very beneficial.

### OBERS "Series E"

As the use of OBERS was a directive from EPA Headquarters, it will be discussed under the guidance section. 101 agencies reported that they were not using OBERS projections, although frequently it was consulted as a base for individualized projections. Persons interviewed at thirteen agencies were not familiar with OBERS Projections.

The major reason stated for not using OBERS was that the agencies believe they were too low. The political sensitivity to low projections can be understood in light of potential future grants and allocation among jurisdictions who have received a grant. Additionally, areas subject to high seasonal influxes (tourism) did not feel that element received adequate treatment in OBERS. 208 areas often did not coincide with the boundaries of OBERS projections. As the county is the smallest jurisdictional unit of OBERS, partial counties in 208 areas of which there are 111 could not be properly estimated. Nor do OBERS account for the secondary effects in energy, recreation, mining, and other areas of expected population increases.

Certain states are developing and in some cases requiring the use of their own population projections. The State of Utah has been exempt from using OBERS. Some agencies are not willing to accept state projections either.

### Technical Guidance

The need for technical guidance was a major concern of the 208 agencies. EPA was most often chosen to provide this guidance. The prioritized needs for such seminars was amazingly consistent throughout the country. The following list ranks by significant number of requests those seminars which are most wanted by those interviewed. The most prevalent need is in the area of nonpoint source guidance. Given regional variations, combined sewer analysis, point and non-point source monitoring, and urban storm water seminars are consistently a top priority throughout the country. Regional prioritized requests with a significant number of mentions are listed below.

## Prioritized Regional Requests for Technical Workshops

### Region 1

Nonpoint source analysis  
Monitoring (point and nonpoint)  
Urban storm water  
Combined sewer analysis

### Region 2

Nonpoint source analysis  
Monitoring (point and nonpoint)  
Urban storm water

### Region 3

Urban storm water  
Nonpoint source analysis  
Monitoring (point and nonpoint)

### Region 4

Urban storm water analysis  
Nonpoint source analysis  
Monitoring (point and nonpoint)

### Region 5

Nonpoint source analysis/agriculture  
Urban storm water  
Combined sewer analysis  
Monitoring (point and nonpoint)  
Simplified stream modeling

### Region 6

Urban storm water analysis  
Nonpoint source analysis

### Region 7

Combined sewer analysis  
Nonpoint source analysis  
Monitoring (point and nonpoint)

### Region 8

Nonpoint source analysis  
Monitoring (point and nonpoint)  
Urban storm water

### Region 9

Nonpoint source

### Region 10

Nonpoint source analysis  
Urban storm water  
Combined sewer analysis  
Monitoring (point and nonpoint)

In the area of nonpoint sources guidance, requests also show the regional variation. These figures should be used as general indicators, as often, those interviewed were not the technical water quality staff. Additionally, it was somewhat early in the planning process to have identified major needs. Requests are listed below:

- agriculture
- construction
- erosion
- feedlots
- mining
- petroleum related
- runoff modelings
- sedimentation
- septic tank analysis

Seminars on nonpoint sources should be carefully directed to remain useful to the particularized need of 208 areas.

#### Management/Legal/Institutional Seminars

There are 110 agencies which expressed interest in attending management/legal and institutional seminars. Only 10 agencies reported they are not in need of guidance in this area, while four indicated they were not sure they wanted to attend seminars.

The greatest demand for seminars across the country was for state-specific legislative backgrounds. This would include authority for institutional rearrangement, such as in the case of a new management agency, as well as nonpoint source controls (land use). Most interviewed felt these would have to be given by the states, but could be sponsored by and given direction from EPA.

The following list is based on regional summaries, with an attempt to pull phrases from the interviews. It is useful not only to pinpoint essential seminars, but also as a general indicator of level of competence. For example, the fact that certain agencies were not able to respond with specific needs usually indicated a lack of knowledge or understanding of the potential magnitude of 208. In the same vein, the listing of the responses provides background as well as direction in this area. Therefore, the following list merely categorizes by subject those seminars which were most consistently desired or were particularly necessary.

## Legal

- The legal implications for interstate arrangements
- Legal responsibilities in the consolidation of sewer districts--outstanding bonds and user fees
- Legal implications of groundwater management
- Land use enforcement (controls)
- Water rights and law

## Management

- Management alternatives for small rural areas
- Institutional arrangements for storm water control
- Alternative management agency structures and systems

## Nonpoint Source

- Evaluation of nonpoint source controls
- Nonstructural management of nonpoint sources

## Financial

- Financing a management agency structure
- Methods for funding the continuing planning process
- Grant management

## Political

- Political aspects of 208--how to work with political conflicts
- Political aspects of creating a management agency

## Procedural

- Evaluating technical and management proposals
- Evaluating existing management agencies
- Techniques in conflict resolution
- Growth management techniques

## General 208

- Elaboration of the 201--208--303 relationship
- Long range Federal involvement in 208
- Coordination between the State and EPA

## Other Suggestions

A variety of ideas emerged on how to expedite the 208 program. One interviewee pointed out that it is essential to gear these seminars to 208's agencies in the various stages of the planning process. A major weakness of seminars to date is that they have been geared to one point in time in the planning process.

An additional aid would be the preparation of a series of seminars or packages geared to the local elected officials. The need for education at this level was continually stressed, and would be a valuable aid to facilitate plan adoption.

In order to prevent the expensive and time-consuming effort required in the development of individual 208 films, it was suggested that the present 208 film from headquarters be modified and distributed. The study team suggests the development of a series of films highlighting different aspects of the 208 process. This would range from education on the 208 process itself to elements such as nonpoint sources. It would also be necessary to highlight elements specific to different parts of the country in order to remain relevant.

Another problem to date has been the lack of a central and complete source of technical information. It was suggested that a hot line providing expert guidance in tune with EPA policy would greatly expedite the 208 process. The central 208 library being developed by EPA Headquarters would certainly serve as such a base. Its success would necessarily depend on the communications network set up to disseminate this information. Although this may not be the best approach, the need for strong technical guidance is paramount at this time.

There is a definite interest in the case study approach. Suggestions include:

- 1) Nonpoint source research by other 208 agencies
- 2) A history of approaches in other areas
- 3) Case studies on constraints during plan implementation

It is felt that this approach would keep guidance less theoretical, and more in line with the problems actually experienced in 208 planning. This could be easily handled by EPA Headquarters in the "Newsletter" to ensure national coverage.

APPENDIX A  
STATISTICAL DATA

The following tables provide data to supplement statistics in the text. 136 of a possible 149 interviews were completed. Of the 13 agencies not interviewed, 9 were in Region IX. In some cases, however, information was unavailable, or agencies were unable to answer the questions as asked. Thus, the total responses to each question does not always add up to 136. Whenever possible, available documents were studied to try to answer some of the profile questions when no interview was done; thus, in some cases the number will be 149-- the total number of 208 agencies. For some questions, agencies were asked to check several items when more than one answer applied. In these cases, total responses will add to more than 136.

Whenever a dash (-) is used in a table, it means that question was asked and the response was negative, or that it was not a factor. Whenever a blank appears, it means that there was no response. This is due to any of three factors, the net result being no information. These factors are:

- 1) The interviewee did not have the background to answer the question.
- 2) The question was not asked due to lack of time.
- 3) The information was not available at that time.

The number of agencies for which there was no information for that particular question is totaled by region in the "no answer" column.



TABLE I  
208 AGENCIES -- DESIGNATED AND INTERVIEWED

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Number of 208 Agencies	17	11	12	28	25	9	5	22	10	10	149
Number of Interviews	17	11	12	26	25	8	5	21	1	10	136

TABLE II  
LEAD INTERVIEW

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
208 Director	15	8	8	20	15	3	5	15	1	5	95
Parent Agency Director	-	-	-	2	7	1	-	-	-	1	11
Application Writer	2	-	-	-	-	4	-	3	-	1	10
Acting Director	-	-	-	2	1	-	-	1	-	3	7
Environmental Director or 208 Supervisor	-	3	4	2	-	-	-	2	-	-	11
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE III  
OTHERS INTERVIEWED

	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Parent Agency Director	3	3	1	-	1	1	3	2	-	2	16
Engineers	4	-	-	6	-	-	-	-	-	-	10
Public Participation Coordinator	1	-	-	1	3	1	-	3	-	-	9
Application Writer	2	-	-	-	-	-	-	-	-	1	3
Environmental Director or 208's Supervisor	-	3	-	-	-	-	-	-	-	-	3
Planning Director	-	-	-	-	-	-	-	-	-	1	1
Other Planners	-	1	-	6	-	-	-	5	1	1	14
State Water Quality	-	-	2	-	4	-	-	1	-	3	10
Land Use	-	-	-	-	4	-	-	-	-	-	4
Assistant Director	-	-	-	-	10	-	-	1	-	-	11
Acting Director	-	-	-	-	-	1	-	-	-	-	1
Consultant	-	-	-	-	-	1	-	3	-	-	4
Citizen Group	-	-	-	-	-	-	1	-	-	-	1
Indian Representative	-	-	-	-	-	-	-	1	-	-	1

TABLE IV  
POPULATION OF 208 AREAS

	<u>1970 Census</u>	<u>Most Recent Estimates (based on diff. yrs.)</u>	<u>Projections* (to 1985, 1990 or 1995)</u>
Region 1	6,004,220	6,436,600	6,534,200*
Region 2	16,671,827	17,059,242	18,726,482
Region 3	10,424,972	10,758,461	11,605,578
Region 4	11,437,670	12,817,820	18,744,780*
Region 5	26,597,479	29,552,067	37,530,416
Region 6	6,721,865	7,151,068	9,275,428
Region 7	3,578,296	3,612,338	4,784,687
Region 8	3,359,544	3,927,835	4,089,028*
Region 9	7,453,980	8,432,731	10,950,749
Region 10	3,153,366	3,389,600	4,762,933
Total	95,403,219	103,137,762	127,004,281*

\*Means not all programs answered

TABLE V

## COUNTIES IN 208 AREAS -- TOTAL AND PARTIAL

<u>Number of Counties</u>	R E G I O N										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Totally included	27	24	66	51	97	15	17	69	6	13	385
Partially included	10	2	-	29	19	21	4	1	17	8	111

TABLE VI

## NUMBER OF SMSA'S IN 208 AREAS -- TOTAL AND PARTIAL

<u>SMSA's Relation to 208 Area</u>	R E G I O N										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Totally included	7	8	9	18	23	8	1	9	5	2	90
Partially included*	7	3	-	10	15	2	2	-	5	5	49

TABLE VII

## SQUARE MILES OF 208 AREAS

	R E G I O N										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Square Miles	7406	9883	12,915	51,572	73,218	19,765	9669	151,911	29,299	18,103	390,562

\*This number is overstated due to the double counting resulting from one SMSA being in more than one 208 area.

TABLE VIII

## OTHER PLANNING FUNCTIONS PERFORMED BY SAME AGENCY

<u>Planning Function</u>	<u>R E G I O N</u>										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
DOT - Transportation	15	7	6	21	18	1	3	11		6	88
CZM - Coastal Zone	9	6	3	9	5	-	-	-		-	32
HUD 701	17	10	9	26	25	8	4	13		7	119
AQMA - Air Quality	3	3	3	4	4	-	2	8		2	29
Solid Waste	16	4	5	12	13	3	4	2		3	62
Areawide Transportation	17	6	4	25	17	7	3	5		8	92
Corps of Engineers	2	1	-	4	6	1	3	1		3	21
Forest Service	-	-	-	5	5	-	-	3		1	14
Soil Conservation Service	12	-	-	1	5	1	-	-		3	22
A-95 Review	16	9	9	20	6	-	3	13		2	84
Other Federal	17	-	-	8	11	5	5	8		10	126
Other State	16	-	-	5	11	5	1	13		10	61
Other Local	17	-	-	1	5	-	4	11		10	48

TABLE IX  
NUMBER OF PLANNING FUNCTIONS PERFORMED BY AGENCY

<u>Function</u>	R E G I O N										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Only 208	-	1	3	-	-	-	-	8	-	-	12
1 Other	-	-	-	-	2	-	-	-	-	-	2
2 - 5 Other	-	1	8	14	7	-	-	3	-	3	36
More than 5	17	9	-	9	16	8	5	9	-	7	80
No Answer	-	-	1	3	-	-	-	1	1	-	6
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE X  
AMOUNT OF WATER RELATED EXPERIENCE

<u>Experience</u>	R E G I O N										<u>Total</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	
Extensive	3	5	6	4	1	1	4	1	-	3	28
Some	13	2	-	18	17	6	1	7	-	5	69
None	1	4	5	1	7	-	-	10	-	2	30
No Answer	-	-	1	3	-	1	-	3	1	-	9
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XI  
AGENCY STAFFING

Staffing	R E G I O N										Total
	1	2	3	4	5	6	7	8	9	10	
Full and Part-time professionals presently employed	46	45	23	49	93	19	11	26	2	11	325
Number non-professionals now on board (full and part-time)	7	-	8	19	34	9	4	12		4	97
Anticipated total professionals	112	96	32	69	244	20	26	24		30	653
Anticipated total non-professionals	34	-	12	45	60	5	11	6		11	184
Borrowed - part-time or temporary	78	32	62	41	413	22	53	64		69	834

TABLE XII  
DISCIPLINES OF DIRECTORS

<u>Disciplines</u>	R E G I O N										<u>Total</u>
	1	2	3	4	5	6	7	8	9	10	
Planner	9	1	5	11	11	-	4	4		1	46
Sanitary Engineer	3	6	4	4	-	-	-	3		3	23
Public Administration	3	1	-	3	3	1	-	4		3	18
Biologist	1	-	-	-	1	-	-	-		-	2
Geologist	1	-	-	-	-	-	-	-		-	1
Water Planner	-	1	-	-	1	1	-	8		2	14
Environmental Planner	-	1	1	2	-	-	-	-		1	5
Public Relations	-	-	1	-	-	-	-	1		-	2
Civil Engineer	-	-	-	3	4	4	-	-		-	11
City Manager	-	-	-	-	1	-	-	-		-	1
Geographer	-	-	-	-	1	-	-	-		-	1
Legal	-	-	-	-	1	-	-	-		-	1
Economist	-	-	-	-	1	-	-	-		-	1
Chemical Engineer	-	-	-	-	-	1	-	-		-	1



TABLE XIII

## DIRECTORS HIRED IN 208 AGENCIES

	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
No. of Directors Hired	17	9	4	21	24	5	4	9	1	6	100
No. of Directors to be Hired	-	2	8	5	1	3	1	8	-	4	32
No Answer	-	-	-	-	-	-	-	4	-	-	4
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XIV

## LENGTH OF STAFF EMPLOYMENT DURING AND BEYOND PLANNING PERIOD

	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
Was Staff Hired for More than 2 Years?											
Yes	3	1	-	12	11	-	1	1	-	5	34
No	14	9	12	5	4	4	3	9	-	5	65
No Answer	-	1	-	9	10	4	1	11	1	-	37
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XV

## PHYSICAL LAY-OUT OF 208 AGENCY OFFICES

AGENCY	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
In One Office	17	8	12	24	25	7	4	17	1	9	124
Split Up in Different Offices	-	3	-	2	-	-	-	-	-	1	6
No Answer	-	-	-	-	-	1	1	4	-	-	6
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XVI

## LOCATION OF 208 AGENCIES IN RELATION TO PARENT AGENCY

	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
With Parent Agency	15	11	9	14	25	8	4	14	1	7	108
Separate From Parent Agency	2	-	3	8	-	-	-	7	-	3	23
No Answer	-	-	-	4	-	-	1	-	-	-	5
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XVII

## ANTICIPATED 208 MANAGEMENT AGENCIES

	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
Agency foreseen as management agency:											
New Agency	-	-	4	9	2	-	-	3	-	1	19
208 Planning Agency	-	1	-	-	-	-	-	1	1	1	4
Single Management Agency	1	1	1	4	-	-	-	4	-	-	11
Several Management with Regional Authority	1	4	4	5	11	3	2	2	-	6	38
Several Management with Local Autonomy	8	5	5	7	10	1	-	8	-	4	48
No Answer	7	1	1	8	2	5	3	5	9	-	41

A-12

TABLE XVIII

## MANAGEMENT SYSTEMS REQUIRING A CONSTITUTIONAL AMENDMENT

Will a constitutional amendment be necessary to create a new agency?	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
Yes	-	-	1	2	2	1	-	-	1	-	7
No	12	-	1	6	13	-	1	1	-	-	34
No Answer	5	11	10	18	10	7	4	20	-	10	95

TABLE XIX  
REGULATORY METHODS DESIRED IN A MANAGEMENT AGENCY\*

METHODS	REGIONS										Total
	1	2	3	4	5	6	7	8	9	10	
Metering Waste Water Flow		4	9	14	16	6	1	13	-	5	68
Differential Tax Assessment		7	7	4	8	5	1	3	-	3	38
Zoning		7	7	3	9	7	1	12	1	6	53
Building, Housing Codes & Subdivision Regulations		7	6	9	9	8		15	1	8	63
P.U.D. and Density Bonuses		4	3	8	7	7	-	6	-	5	40
Transfer of Development Rights		2	-	3	-	3	-	2	-	-	10
Discharge Permits		2	2	12	13	8	1	15	1	3	57
Don't Know	17		2	3	8	2	6	2	-	1	41
TOTAL	17	33	36	56	70	46	10	68	3	31	370

\*Answers will not total 136 due to multiple responses to question.

TABLE XX

## TECHNIQUES FOR PUBLIC PARTICIPATION

		Region										Total
		1	2	3	4	5	6	7	8	9	10	
Public Meetings	in-use	9	6	4	10	16	4	2	8	1	9	70
	intended	17	7	4	21	13	4	5	11	3	7	92
Newsletters	in-use	3	2	5	14	19	3	-	4	-	7	60
	intended	15	7	3	17	11	5	5	7	1	6	77
Planning Brochure	in-use	5	2	2	2	9	-	-	2	-	3	25
	intended	16	4	5	8	14	6	4	5	2	6	70
Speeches	in-use	8	6	4	9	12	1	1	6	1	8	53
	intended	17	8	4	19	16	5	5	6	2	6	88
TV Coverage	in-use	2	4	3	9	7	1	2	2	-	5	35
	intended	15	6	3	18	16	4	3	9	1	6	81
Newspaper Coverage	in-use	12	5	5	17	17	1	2	9	1	9	87
	intended	17	9	4	19	14	6	5	10	2	8	93
Radio Coverage	in-use	5	4	4	10	12	-	2	6	1	7	51
	intended	14	8	4	15	16	2	4	9	1	7	80
Slide Shows	in-use	-	1	1	2	5	-	1	2	1	6	19
	intended	12	7	3	15	17	7	4	8	1	8	92
Exhibits	in-use	-	-	-	1	6	-	-	2	-	6	15
	intended	9	6	3	14	13	2	4	6	1	3	61
Depositories	in-use	-	2	1	2	8	-	-	2	-	3	18
	intended	14	7	2	8	15	2	3	6	1	3	61

TABLE XXI

## PERCENTAGE OF GRANT AWARD TO BE CONTRACTED OUT

REGION											
1	2	3	4	5	6	7	8	9	10	Total	
48%	55%		59%	55%	62%	57%	67%		56%		58% National Average

TABLE XXII

## TYPE OF CONTRACTORS: FOR 208 PLANNING

A-15

		REGION											
Contractors		1	2	3	4	5	6	7	8	9	10	Total	
A-15	Architectural and Engineering	28	4		6	8	2	6	18		7	79	
	Environmental	10	9		10	-	2	1	3		1	36	
	Engineering/Planning	8	-		5	-	-	2	2		5	22	
	Planning	9	8		4	-	-	2	10		4	37	
	Legal	2	3		-	-	2	2	5		3	17	
	Management Program	2	4		-	3	-	1	1		1	12	
	Institutional/management/ financial	5	7		14	-	3	2	6		9	46	
	Public participation	5	1		2	-	-	-	2		1	11	
	Water Quality Research and Analysis	1	10		11	-	2	3	-		2	29	
	University (non-profit)	2	1		2	-	-	-	1		1	7	
Total		72	47		54	11	11	19	48		34	296	

TABLE XXIII  
NUMBER OF INTENDED GOVERNMENT CONTRACTS

	R E G I O N										
	1	2	3	4	5	6	7	8	9	10	Total
Federal Agencies	6	1	-	-	1	-	1			4	13
State Agencies	5	3	1	-	1	-	6			4	20
Counties	-	3	-	5	1	-	13			8	30
Local Agencies	3	-	-	8	6	-	1			1	19
Total	14	7	1	13	9	-	21			17	82

TABLE XXIV  
METHOD OF DESIGNATION OF 208 AGENCIES

	R E G I O N										
	1	2	3	4	5	6	7	8	9	10	Total
Designated by Governor	15	10	10	28	25	9	5	22	10	10	144
Designated by Self	2	-	2	-	-	-	-	-	-	-	4
Total	17	10	12	28	25	9	5	22	10	10	148

TABLE XXV  
PREPARATION OF GRANT APPLICATION

PREPARATION BY:	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
Staff	8	10	7	21	19	6	3	13	-	10	97
Consultant	2	1	-	1	1	-	-	5	-	-	10
Joint	7	-	2	4	5	1	2	2	1	-	24
Other	-	-	3	-	-	-	-	1	-	-	4
Don't Know	-	-	-	-	-	1	-	-	-	-	1
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XXVI  
AGENCY PERCEPTION OF  
GRANT APPLICATION REQUIREMENTS

	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
Reasonable	15	3	4	22	18	8	4	15	-	-	89
Not Reasonable	2	4	5	4	2	-	1	4	-	-	22
Don't Know	-	4	3	-	5	-	-	2	1	10	25
Total	17	11	12	26	25	8	5	21	1	10	136



TABLE XXVII

## AGENCIES THAT DID NOT RECEIVE HANDBOOKS

	REGIONS										Total
	1	2	3	4	5	6	7	8	9	10	
<u>Designation Handbook:</u>											
Did Not Receive Handbook	-	-	-	-	1	4	1	6	-	-	12
No answer	-	-	7	-	1	-	-	-	-	-	8
<u>Work Plan Handbook</u>											
Did Not Receive Handbook	-	-	-	-	1	-	1	4	-	-	6
No answer	-	-	7	-	1	-	-	-	-	10	18

TABLE XXVIII

## AGENCIES THAT RECEIVED HANDBOOKS TOO LATE TO BE USEFUL

	REGIONS										Total
	1	2	3	4	5	6	7	8	9	10	
Designation Handbook	11	3	-	14	13	8	-	6	1	5	61
Work Plan Handbook	7	3	-	10	13	4	1	5	1	1	45

TABLE XXIX

## AGENCIES THAT DID NOT USE HANDBOOKS

	REGIONS										Total
	1	2	3	4	5	6	7	8	9	10	
Designation Handbook	11	-	-	14	8	4	1	5	1	4	48
Work Plan Handbook	10	-	-	10	11	1	2	3	1	2	40

TABLE. XXX

AGENCIES THAT WERE AWARE OF THE 208 BULLETIN  
DURING DESIGNATION PROCESS

	REGION										Total
	1	2	3	4	5	6	7	8	9	10	
Yes	15	4	5	12	8	2	3	3	-	6	58
No	2	4	2	12	16	5	2	16	-	4	63
No answer	-	3	5	2	1	1	-	2	1	-	15
Total	17	11	12	26	25	8	5	21	1	10	136

TABLE XXXI

AGENCY EVALUATION OF HANDBOOKS

	<u>208 Draft Guidelines</u>	<u>Designation Handbook</u>	<u>Work Plan Handbook</u>
Useful	101	62	66
Not Useful	4	1	7
Insufficient Detail	24	6	16
Too Detailed	12	1	4
Sufficient Detail	22	14	15
Sensitive to Local Situation	20	14	16
Insensitive to Local Situation	20	11	12
Neutral	10	4	3
No answer	6	10	7

APPENDIX B

PLANNING AGENCY DIRECTORY

As of July 1, 1975 the following one hundred and forty nine (149) areas and agency designations have been approved by the Administrator, Environmental Protection Agency

<u>Region and Area</u>	<u>Designation Date</u> <u>(Grant Amount)</u>	<u>Agency</u>	<u>Contact</u>
<u>Region I</u>			
Portland, Me.	6-25-74 (770,000)	Greater Portland Council of Governments 169A Ocean Street Portland, Maine 04106	Mr. Frederick Sheenan, (207) 799-8523
Southern Maine	7-26-74 (488,000)	Southern Maine Regional Planning Commission York County Courthouse Alfred, Maine 04002	Mr. Brian Chernack (207) 324-2952
Northern Maine	8-5-74 (207,900)	Northern Maine Regional Planning Commission McElwaine House 2 Maine Street Caribou, Maine 04736	Mr. James Barresi (207) 498-8736
Lewiston-Auburn, Me.	12-19-74 (339,100)	Androscoggin Valley Regional Planning Comm. 34 Court Street Auburn, Maine 04210	Mr. Craig Ten Broeck (207) 784-0151
Augusta-Cobbosse, Maine	12-19-74 (380,000)	Southern Kennebec Regional Planning Commission 154 State Street Augusta, Maine 04330	Mr. John Forster (207) 622-7146
Berkshire County Pittsfield, Mass.	2-19-75 (374,000)	Berkshire County Regional Planning Commission 10 Fern Street Pittsfield, Mass. 01201	Mr. Gaylord Burke (413) 442-1521
Cape Cod, Mass.	2-27-75 (350,000)	Cape Cod Planning & Economic Development Comm. First District Courthouse Barnstable, Mass. 02630	Dr. William Stanburg (617) 362-2511 Ext 477

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Martha's Vineyard, Massachusetts	2-27-75 (216,000)	Martha's Vineyard Land & Water Commission Box 1447 Oak Bluffs, Mass. 02557	Bill Wiocox (617) 693-3453
Lowell, Mass.	3-4-75 (456,840)	Northern Middlesex Area Commission 144 Merrimac Street Lowell, Mass. 01852	Mr. Michael diGiano (617) 454-8021
Brockton, Mass.	3-6-75 (650,000)	Old Colony Planning Council 232 Main Street Brockton, Mass. 02401	Mr. Robert MacMahan (617) 583-1833
Boston, Mass.	4-18-75 (2,292,000)	Metropolitan Area Planning Council 44 School Street Boston, Mass. 02108	Mr. John Harrington (617) 523-2454
Salem, N.H.	4-1-75 (270,300)	Southern-Rockingham Regional Planning District Commission 19 Main Street Salem, NH 03709	Mr. John Gilmore (603) 893-8233
Worcester, Mass.	4-11-75 (1,035,000)	Central Massachusetts Regional Planning Comm. 70 Elm Street Worcester, Mass. 01609	Mr. James M. Arnold (617) 756-7717
Fitchburg, Mass.	4-17-75 (377,000)	Montachusett Regional Planning Commission 150 Main Street Fitchburg, Mass. 01420	Mr. David Weir (617) 345-7376
Southeastern, Mass.	5-20-75 (1,132,000)	Southeastern Regional Planning and Economic Development District 7 Barnadas Road Marion, Mass 02738	Mr. Alex Zaleski (617) 748-2100
Lakes Region, N.H.	6-3-75 (533,000)	Lakes Region Planning Commission Humiston Building Box 302 Meredith, New Hampshire 03253	Mr. David G. Scott (603) 279-6550

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Providence, RI	6-23-75 (2,300,000)	Rhode Island Statewide Planning Program 265 Melrose Street Providence, RI 02907	Patrick J. Fingliss (401) 277-2656
<u>Region II</u>			
Puerto Rico	4-17-75 (1,396,000)	Commission for the Devel- opment and Administration of of Areawide Waste Treatment Plans for the North Metro- politan Area. Puerto Rico Environmental Quality Board P.O. Box 11488 Santurce, Puerto Rico 00910	Mr. Carlos M. Jiemenez Barber (809) 725-5140
Nassau-Suffolk Counties, Long Island, N.Y.	4-24-75 (5,207,000)	Nassau-Suffolk Regional Planning Board Planning Building Suffolk County Center Veterans Memorial Highway Hauppauge, Long Island, NY 11787	Dr. Lee E. Koppleman (516) 979-2922
Mercer Co., N.J.	5-12-75 (974,145)	Delaware Valley Regional Planning Commission Penn Towers Building 1819 John F. Kennedy Blvd. Philadelphia, Penn. 19103	Mr. John Coscia (215) 567-3000
Camden, N.J.	5-14-75 (1,264,800)	Delaware Valley Regional Planning Commission Penn Towers Building 1819 John F. Kennedy Blvd. Philadelphia, Penn. 19103	Mr. John Coscia (215) 567-3000
Middlesex Co., N.J.	5-14-75 (1,420,000)	Board of Chosen Freeholders of Middlesex County Kennedy Square 40 Livingston Avenue New Brunswick, N.J. 08901	Mr. Douglas S. Powell (201) 246-6062
Westchester, N.Y.	6-3-75 (1,080,000)	Westchester County Government Environmental Coordinating Agency-Environmental Advisory Council c/o Westchester County Planning Department 910 County Office Building White Plains, New York 10601	Mr. Peter Q. Eschweiler, (914) 682-2498
Erie-Niagara, N.Y.	6-3-75 (1,825,000)	Erie-Niagara Regional Planning Board 2085 Baseline Road Grand Island, N.Y. 14072	Mr. Leo J. Nowak, Jr. (716) 773-7611

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Ocean Co. N.J.	6-3-75 (503,200)	Ocean County Board of Chosen Freeholders Court House Square Toms River, N.J. 08753	Mr. Thomas A. Thomas (201) 244-2121
New York City, N.Y.	6-5-75 (8,111,533)	New York City Environ- mental Protection Administration Municipal Bldg., Rm 2455 New York, New York 10007	Mr. Norman Nash (212) 556-3641
Southern Tier Central (Corning) N.Y.	6-5-75 (808,000)	Southern Tier Central Regional Planning and Development Board 53 1/2 Bridge Street Corning, New York 14830	Mr. William D. Hess (607) 962-5092
Central New York (Syracuse) N.Y.	6-5-75 (1,271,000)	Central New York Regional Planning and Development Board 321 East Water Street Syracuse, N.Y. 13202	Mr. Robert C. Morris (315) 422-8276

#### Region III

New Castle County, Delaware	6-12-74 (1,200,000)	New Castle County Areawide Waste Treatment Management Planning Agency 1 Peddler's Village Newark, Delaware 19711	Mrs. Merna Hurd (302) 731-7670
Hampton Roads, Va.	6-25-74 (1,600,000)	Hampton Roads Water Quality Agency Pembroke 3 Office Building Suite 131 Virginia Beach, Va. 23462	Mr. Paul Fisher (804) 499-5531
Roanoke, Va.	6-25-74 (843,050)	5th Planning District Commission P.O. Box 2527 145 West Campbell Ave. Roanoke, Va. 24010	Mr. F. Ray Bailey (703) 343-4417
Richmond, Va.	6-25-74 (1,300,000)	Crater Planning District Commission 2825 Crater Road South P.O. Box 1808 Petersburg, VA 23803	Mr. Jerry Simmonoff (804) 861-1666

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Fredericksburg, Va.	1-7-75 (350,000)	Rappahannock Area Development Commission (RADCO) 913 Charles Street P.O. Box 863 Fredericksburg, Va. 22401	Mr. Ronald Rebman (703) 373-2890
Sussex County, Del.	1-30-75 (633,089)	Sussex County Council P.O. Box 507 Georgetown, Del. 19947	Mr. Roger Truitt (302) 856-7701 x216
Southwest Virginia	1-30-75 (649,920)	Cumberland Plateau-Lenowisco 208 Planning Agency-Southwest Virginia U.S. Highway 58-421W Duffield, Va. 24244	Mr. Paul E. Trammel (703) 431-2206
Washington, D.C.	3-27-75 (3,550,000)	Metropolitan Washington Council of Governments 1225 Connecticut Ave., NW Washington, D.C. 20036	Mr. Charles Spooner (202) 223-6800
Baltimore, MD	6-6-75 (1,187,527)	Regional Planning Council 701 St. Paul Street Baltimore, Maryland 21202	Mr. Tom Smith (301) 383- 5840
Charlestown, WV	6-6-75 (801,000)	B-C-K-P Regional Inter-Governmental Council 410 Kanawha Blvd. East Charlestown, W.V. 25301	Mr. Mike Russel (304) 348- 7190
Pittsburgh, PA	6-23-75 (1,511,432)	Southwestern Penn. Regional Planning Commission 564 Forbes Avenue Pittsburgh, PA 15219	Mr. James DeAanelis (412) 391-4120
Philadelphia, PA	6-18-75 (3,852,032)	Delaware Valley R.P.C. Penn Towers Bldg. 1819 J.F. Kennedy Blvd. Philadelphia, PA 19103	Mr. John Coscia (215) 567-3000

#### Region IV

Raleigh-Durham, North Carolina	4-9-74 (947,500)	Triangle J. Council of Governments P.O. Box 12276 Research Triangle Park, North Carolina 27709	Mr. Frank Chamberlain (919) 549-0551
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Region and Area	Designation Date (Grant Amount)	Agency	Contact
Memphis, Tenn.	6-25-74 (1,187,000)	Miss-Tenn-Ark COG Memphis Delta Development District Commission 125 North Main Street Room 518 Memphis, Tenn. 38103	Mr. Hugh Teaford (901) 362-1883
Knoxville, Tenn.	6-28-74 (670,000)	Knoxville-Knox County Metro Planning Commission 301 Locust Street Knoxville, Tenn. 37902	Mr. Don Parnell (615) 637-4663
Chattanooga, Tenn.	10-10-74 (949,000)	Chattanooga Area Regional Council of Governments 413 James Building 735 Broad Street Chattanooga, Tenn. 37402	Mr. Gordon Mellancamp (615) 266-5781
Nashville, Tenn.	11-11-74 (868,700)	Mid-Cumberland Council of Gov'ts/Development District Suite 801 226 Capitol Boulevard Nashville, Tenn. 37219	Mr. Phil Armor (615) 244-1212
Birmingham, Ala.	3-25-75 (1,250,000)	Birmingham Regional Planning Commission 21 Office Plaza South 2112 11th Ave., South Birmingham, Ala. 35205	Mr. Doug Maddock (205) 325-3897
Tuscaloosa, Ala.	3-25-75 (601,000)	West Alabama Planning & Development Council P.O. Box 86 Tuscaloosa, Ala. 35401	Ms. Nancy Landgraf (205) 345-5545
Columbia, S.C.	3-25-75 (736,250)	Central Midland Regional Planning Council Dutch Plaza, Suite 55 800 Dutch Square Blvd. Columbia, S.C. 29210	Mr. Mike McAnnelly (803) 798-1243
Louisville, Ky.	4-2-75 (837,000)	Kentuckiana Regional Planning & Development Agency 208 South Fifth Street Louisville, Kentucky 40202	Mr. Larry Cox (502) 581-6096



Region and Area	Designation Date (Grant Amount)	Agency	Contact
Orlando, Fla.	3-27-75 (909,400)	East Central Florida Regional Planning Council 1011 Wymore Road, Suite 105 Winter Park, Fla. 32789	Mr. Arron Dowling (305) 645-3339
Volusia, Fla.	4-22-75 (730,000)	Volusia County Planning and Development Department 125 E. Orange Avenue County Courthouse Annex Daytona Beach, Fla. 32014	Mr. Don Sikorski (904) 255-0111
Brevard County, Florida	4-24-75 (736,000)	Brevard County Planning & Zoning Department 2575 N. Courtenay Parkway Merritt Island, Fla. 32952	Mr. John W. Hannah (305) 452-9480
Bay County (Panama City), Fla.	4-30-75 (538,000)	Northwest Florida Planning & Development Council 5321 'B' W. Highway 98 Panama City, Fla. 32401	Mr. Charles Shih (904) 785-9581
Palm Beach, Fla.	1-10-75 (984,000)	Area Planning Board of Palm Beach County P.O. Box 3643 West Palm Beach, Fla. 33402	Mr. Richard Stalker (305) 683-9450
Greenville, S.C.	5-9-75 (1,139,520)	South Carolina Appalachian Council of Governments 211 Century Drive Greenville, S.C. 29606	Mr. F.J. Forbes (803) 242-9733
Pensacola, FL	5-14-75 (848,000)	West Florida Regional Planning Council P.O. Box 486 Pensacola, Florida 32593	Mr. Dwaine Raynor (904) 434-1026
Sarasota-Ft. Myers Florida	5-16-75 (949,000)	Southwest Florida Regional Planning Council 2121 West First Street Ft. Myers, Florida 33901	Mr. Larry Pearson (813) 334-7382
Mobile, Alabama	5-22-75 (1,143,000)	South Alabama Regional Planning Commission 250 N. Water Street P.O. Box 1665 Mobile, Alabama 36601	Mr. Don Pruitt (205) 433-6541

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Broward Co. FL	5-23-75 (863,000)	Broward County Area Planning Board 1600 S.E. 10th Terrace Fort Lauderdale, Fla. 33316	Mr. Walter Keller (305) 765-5535
Tampa Bay, FL	5-27-75 (1,500,000)	Tampa Bay Regional Planning Council 3151 Third Avenue North Suite 540 St. Petersburg, Fla. 33713	Mr. Ron Armstrong (813) 821-2811
Dade Co., FL	5-30-75 (1,077,000)	Dade Cou ty Planning Department 909 S.E. 1st Avenue Miami, Florida 33131	Mr. Ed Cahill (305) 358-1400
Tallahassee, FL	5-30-75 (510,000)	Tallahassee-Leon County Planning Department P.O. Box 533 Tallahassee, Florida 32302	Mr. Tom Pierce (904) 488-6133
Beaufort, S.C.	6-3-75 (680,000)	Lowcountry Regional Planning Council P.O. Box 98 Yemassee, South Carolina 29945	Mr. Charles Baggs (803) 589-2751
Kingsport-Bristol, TN	6-5-75 (903,000)	First Tennessee-Virginia Development District 1110 Seminole Drive P.O. Box 2779 E.T.S.U. Johnson City, TN 37601	Mr. Bob Purcell (615) 928-0224
Polk Co.	6-6-75 (759,000)	Central Florida Regional Planning Council P.O. Box 2089 Bartow, Florida 33830	Mr. Barry Chefer (813) 533-4146
Charleston, S.C.	6-6-75 (1,000,000)	Berkeley, Charleston, Dorchester Regional Planning Council No. 2 Courthouse Sq. County Office Bldg. Charleston, S.C. 29401	Mr. Ken Fujishiro (803) 577-7800
Waccamaw, S.C.	6-6-75 (650,000)	Waccamaw Regional Planning Council P.O. Box 419 Georgetown, S.C. 29440	Mr. Bob Barker (803) 546-8502

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Asheville, N.C.	6-23-75 (481,000)	Land-of-the-Sky-Regional Council 755 Merriman Avenue P.O. Box 2175 Asheville, N.C. 28802	Mr. Dennie Martin (704) .254-8131
<u>Region V</u>			
Cincinnati, Ohio	6-12-74 (1,913,000)	Ohio-Kentucky-Indiana Regional Council of Gov'ts 426 East 4th Street Cincinnati, Ohio 45202	Mr. Dory Montazemi 513-621-7060
Toledo, Ohio	6-25-74 (1,175,000)	Toledo Metropolitan Area Council of Governments 420 Madison Avenue Suite 725 Toledo, Ohio 43604	Mr. Hintz Russelman 419-241-9155
Dayton, Ohio	6-25-74 (1,500,000)	Miami Valley Regional Planning Commission 33 West First Street Dayton, Ohio 45402	Mr. Roger Riga 513-223-6323
Youngstown, Ohio	6-28-74 (950,000)	Eastgate Development & Transportation Agency 1616 Covington Street Youngstown, Ohio 44510	Mr. Bill Fergus 216-746-4665
Southeastern Wisconsin	12-26-74 (2,607,000)	Southeastern Wisconsin Planning Comm. (SEWRPC) 916 S.E. Avenue Waukesha, Wisconsin 53186	Mr. Bill McElwee 414-547-6721
Detroit, Michigan	5-20-75 (5,056,000)	Southeast Michigan Council of Governments 1249 Washington, Blvd. Detroit, Michigan 48226	Mr. Don Lamb 313-961-4266
East St. Louis, Il	5-20-75 (1,105,000)	Southeastern Illinois Metropolitan and Regional Planning Commission 203 West Main Street Collinsville, Il 62234	Mr. Bill Ellman 618-344-4250
Lake & Porter Counties, IN	5-20-75 (985,000)	Northwestern Indiana Regional Planning Comm. 8149 Kennedy Avenue Highland, Indiana 46322	Mr. Ken Cypre 219-923-1060

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Dane County, WI	5-22-75 (598,000)	Dane County Regional Planning Commission Room 312 City-County Building Madison, Wisconsin 53709	Mr. Charles Montemayor 608-266-4137
South Bend, IN	5-23-75 (862,000)	Michiana Area Council of Governments 11th Floor City-County Building South Bend, Indiana 46601	Mr. George L. Kruse, Jr. 219-287-1829
Canton-Akron, OH	5-23-75 (973,000)	Northeast Ohio Four County Planning and Development Organization 19 North High Street Akron, Ohio 44308	Mr. Robert Strantton 216-535-2644
Kalamazoo, MI	5-27-75 (810,000)	South Central Michigan Planning & Development Comm. Conference Center, Connors Hall Nazareth College Nazareth, Michigan 49074	Mr. Walt Forbes 616-343-1676
Cleveland, OH	5-27-75 (3,209,000)	Northeast Ohio Areawide Coordinating Agency 439 The Arcade Cleveland, Ohio 44114	Mr. Tony Ma 216-241-2414
Flint, MI	5-27-75 (848,000)	Genessee, Lapeer, and Shiawassee Counties Region V Planning and Development Commission 801 South Saginaw Flint, Michigan 48502	Mr. Thomas Haga, 313-766-8865
Muncie, IN	5-27-75 (669,000)	Region 6 Planning and Development Commission 207 North Talley Muncie, Indiana 47303	Mr. Dave Schoen 317-285-6252
Jackson, MI	5-27-75 (566,000)	Region II Planning Comm. Jackson County Building 312 S. Jackson Street Jackson, Michigan 49201	Mr. Charles Mancherian 517-787-3800 ext. 256

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Indianapolis, IN	5-30-75 (1,301,000)	Indiana Heartland Coordinating Commission Suite 217 7202 N. Shadeland Avenue Indianapolis, IN 46250	Mr. Michael Robling 317-849-4629
Chicago, IL	5-30-75 (7,343,000)	Northeastern Illinois Planning Commission (NIPC) 10 South Riverside Plaza Chicago, Illinois 60606	Mr. Robert DuCharme 312-454-0400
Bay City, MI	6-3-75 (1,040,000)	East Central Michigan Regional Planning and Development Commission 1003 Woodside Avenue Essexville, Michigan 48732	Mr. David Gay 517-893-5561
Muskegon, MI	6-6-75 (620,000)	West Michigan Shoreline Regional Development Comm. Torrent House 315 W. Webster Avenue Muskegon, Michigan 49440	Mr. Pat Tyson 616-722-7878
Grand Rapids, MI	6-6-75 (1,012,000)	West Michigan Regional Planning Commission 1204 People's Building 60 Monroe at Iona Grand Rapids, MI 49502	Mr. Robert Stockman 616-454-9375
Tri-County, MI	6-6-75 (704,000)	Tri-County Regional Planning Commission 2722 E. Michigan Avenue P.O. Box 2066 Lansing, Michigan 48912	Mr. Michael Scieszka 517-487-9424
Green Bay, WI	6-6-75 (772,000)	Fox Valley Water Quality Planning Agency 1919 North Lake Street Neenah, Wisconsin 54956	Mr. Nathiel Malcoze 414-739-6156
Terre Haute, IN	6-6-75 (477,000)	West Central Indiana Economic Development District P.O. Box 627 700 Wabash Avenue Terre Haute, IN 47808	Mr. Charles Staats 812-238-1561
Southern Illinois	6-23-75 (1,200,000)	Greater Egypt Regional Planning & Development Comm. P.O. Box 3160 608 East College Carbondale, Illinois 62901	Mr. Franklin Moreno 618-549-3306

Region and Area	Designation Date (Grant Amount)	Agency	Contact
<u>Region VI</u>			
Tulsa, Oklahoma	9-18-74 (1,210,000)	Indian Nations Council of Governments 630 West Seventh Street Tulsa, Oklahoma 74127	Mr. Umesh Mathur (918) 587-3178
Oklahoma City, OK	10-25-74 (1,500,000)	Association of Central Oklahoma Governments 4801 Classen Blvd, Suite 200 Oklahoma City, OK 73118	Mr. Bob Fritz (405) 848-8961
Dallas/Ft. Worth, Texas	4-17-75 (2,321,620)	North Central Texas Council of Governments P.O. Box 5888 Arlington, Texas 76011	Mr. Herman Veselka (817) 261-3331
Beaumont-Port Arthur, Texas	4-18-75 (843,000)	Southeast Texas Regional Planning Commission 3800 Highway 365 Port Arthur, Texas 77640	Mr. Don Kelly (713) 727-2384
Houston, Texas	4-22-75 (1,798,300)	Houston-Galveston Area Council 3701 West Alabama Houston, Texas 77027	Mr. Nick Aschliman (713) 627-3200
San Antonio, TX	5-16-75 (1,162,112)	Alamo Area Council of Governments 400 Three America's Bldg. San Antonio, Texas 78205	Mr. Al Notzon (512) 255-5201
Corpus Christi, TX	6-6-75 (643,500)	Coastal Bend Council of Governments International Airport Corpus Christi, TX 78410	Mr. Robert Weaver (512) 884-3911
Lower Rio Grande, Texas	6-6-75 (775,000)	Lower Rio Grande Valley Development Council First National Bank Bldg. Suite 207 McAllen, Texas 78501	Mr. Richard Montedeoca (512) 682-3481
Texarkana, TX	6-23-75 (350,000)	Ark-Tex Council of Govts. P.O. Box 5307 Texarkana, TX 75501	Mr. Frank Goerke (214) 794-3481

<u>Region and Area</u>	<u>Designation Date</u> (Grant Amount)	<u>Agency</u>	<u>Contact</u>
<u>Region VII</u>			
Des Moines, Iowa	6-10-74 (1,385,000)	Central Iowa Regional Association of Governments P.O. Box 3326 Des Moines, Iowa 50316	Dale Harrington 515-244-3257
St. Louis, MO	5-23-75 (2,243,000)	East-West Gateway Coordinating Council 720 Olive Street Suite 2110 St. Louis, MO 63101	Mr. Larry Zensinger 314-421-4220
Centerville, Iowa	5-23-75 (325,000)	Chariton Valley Regional Services Agency P.O. Box 591 Centerville, Iowa 52544	Mr. Charles McCarty 515-856-2114
Joplin, MO	6-6-75 (429,500)	Ozark Gateway Regional Planning Commission 303 E. Third Street P.O. Box 1355 Joplin, MO 64801	Mr. Peter Smith 417-781-3220
Kansas City, KS	6-13-75 (1,400,000)	Mid-America Regional Council, Third Floor 20 West 9th Street Kansas City, MO 64105	Mr. Tom Neal 816-221-0993

Region and Area	Designation Date (Grant Amount)	Agency	Contact
<u>Region VIII</u>			
Colorado Springs	6-26-74 (955,000)	Pikes Peak Area Council of Governments 27 East Vermigo Colorado Springs, Col. 80903	Mr. Roland Gow (303) 471-7080
Pueblo County, Col.	9 18-74 (485,000)	Pueblo Area Council of Governments 1 City Hall Place Pueblo, Col. 81003	Mr. Gene Fisher (303) 543-6006
Denver, Col.	10-8-74 (1,290,000)	Denver Regional Council of Governments 1776 S. Jackson Street Denver, Col. 80210	Mr. Michael Smith (303) 758-5166
Provo, Utah	1-1-75 (670,000)	Mountain Association of Governments 160 East Center Street Provo, Utah 84601	Mr. George Scott (801) 373-5510
Uintah, Utah	1-10-75 (380,000)	Uintah Basin Association of Governments P.O. Box 867 26 W. 200 North Roosevelt, Utah 84066	Mr. Clinton Harrison (301) 722-4518
Salt Lake County, Utah	3-6-75 (1,046,000)	Salt Lake County Council of Governments 2500 S. State Street Salt Lake City, Utah 84115	Dr. David Eckhoff (801) 328-7461
Middle Yellowstone, Montana	4-1-75 (735,000)	Middle Yellowstone Areawide Planning Organization 3300 2nd Avenue North Suite 200 Billings, Montana	Mr. Allen Bond (406) 245-6619
Flathead & Lake Counties, Montana	4-2-75 (495,000)	Flathead Drainage 208 Project P.O. Box 100 Kalispell, Montana 59901	Mr. Dave Nunnallee (406) 755-5521



Region and Area	Designation Date (Grant Amount)	Agency	Contact
<u>Region VIII</u>			
Ogden, Utah (Weber-Davis Counties)	4-2-75 (827,000)	Weber River Water Quality Planning Council 714 Municipal Building Ogden, Utah 84401	Mr. Mike Minor (801) 399-8401
Powder River, WY	4-4-75 (415,000)	Powder River Areawide Planning Organization Box 204 Buffalo, WY 82834	Mr. Rich Douglass (307) 684-7648
Southeast, Utah	4-17-75 (380,000)	Southeastern Utah Association of Govts. 143 So. Main Street Helper, Utah	Dr. Courtney Brewer (801) 472-3403
Yellowstone-Tongue Montana	4-8-75 (540,000)	Yellowstone-Tongue Areawide Planning Organization Powder River County Courthouse Breadus, Montana 59317	Mr. Floyd Irion (406) 436-2483
Rifle, Colorado (Mesa/Rio Blanco)	4-24-75 (362,000)	Colorado West Area P.O. Box 351 Rifle, Col. 81650	Mr. Joel Webster (303) 625-1723
Green River, WY	5-14-75 (450,000)	Southwestern Wyoming Water Quality Planning Association Lincoln County Courthouse Kemmerer, WY.	Mr. Glenn Payne (307) 789-3897
Five Counties, Utah	5-14-75 (380,000)	Five County Association of Governments P.O. Box 261 Cedar City, Utah 84720	Mr. Neal Christensen (801) 586-4842
Northwest, Col.	5-14-75 (530,000)	Northwest Colorado Council of Govts. P.O. Box 737 Frisco, Col. 80443	Mr. Lee Woolsey (303) 468-5445
Larimer-Weld, Col.	5-14-75 (590,000)	Larimer-Weld Council of Governments 201 East 4th Street Room 201 Loveland, Col. 80537	Mr. Dick MacRavey (303) 667-3288

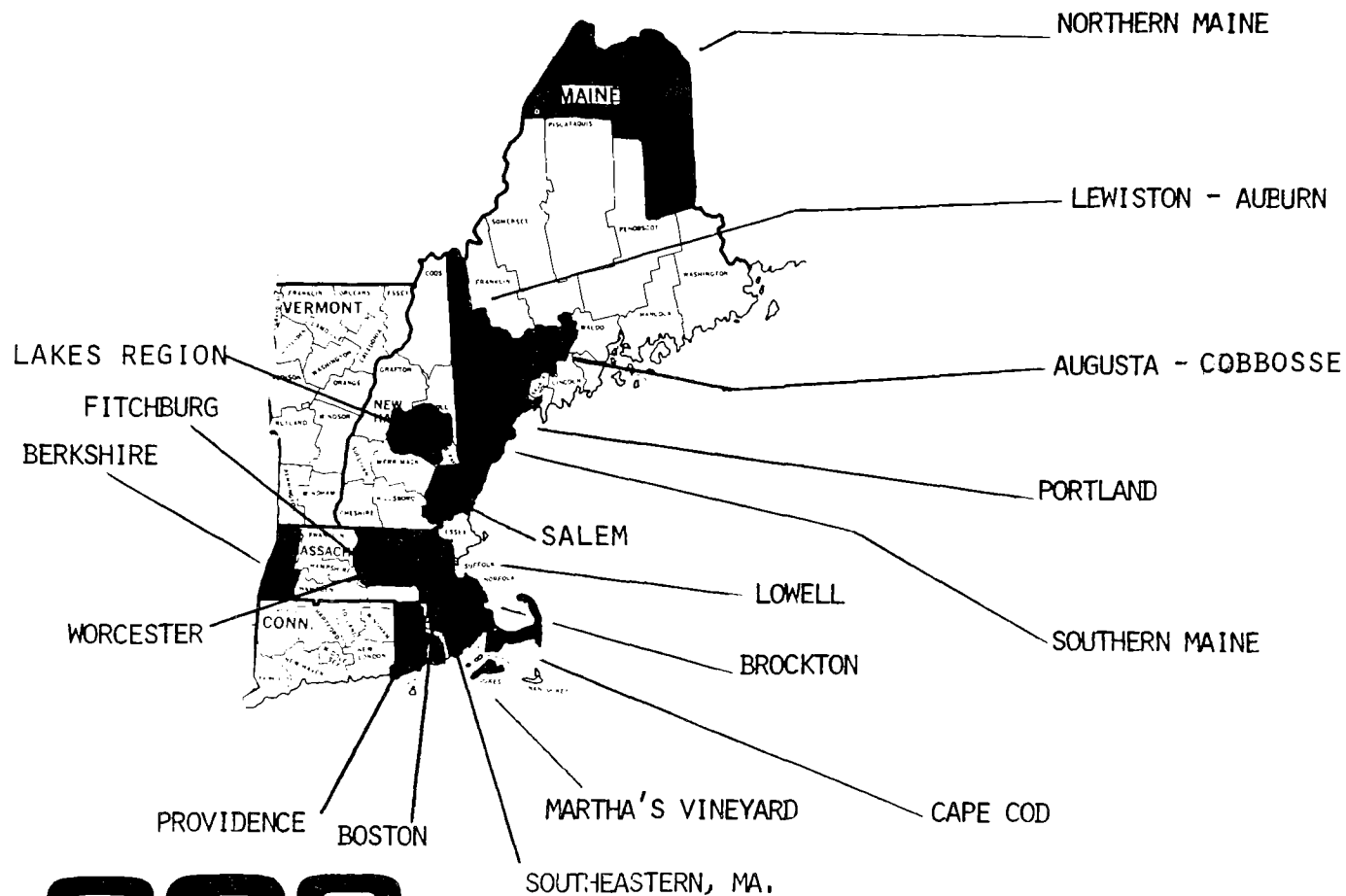
Region and Area	Designation Date (Grant Amount)	Agency	Contact
Black Hills, SD	5-16-75 (375,000)	Sixth District Council of Local Governments P.O. Box 1568 Rapid City, SD 57701	Mr. Larry Finnerty (605) 342-8241
Lewis & Clark, ND	5-22-75 (400,000)	Lewis & Clark Resource Planning & Development Council Box 236 Mandan, ND 58554	Mr. Robert O'Shea (701) 663-6587
Sioux Falls, SD	5-27-75 (375,000)	South Eastern Council of Governments 208 E. 13th Street Sioux Falls, SD 57105	Mr. John Norton (605) 336-1297
Jackson Hole, WY	6-4-75 (370,000)	Teton County-Section 208 Planning Agency P.O. Box 1727 Jackson, WY 83001	Mr. William Ashley (307) 733-4430
Gallatin, MT	6-5-75 (475,000)	Gallatin County Commission Gallatin County Courthouse Bozeman, MT 59715	Mr. Walter Sales (406) 587-7316

Region and Area	Designation Date (Grant Amount)	Agency	Contact
<u>Region IX</u>			
Lake Tahoe Interstate	8-5-74 (702,000)	Tahoe Regional Planning Agency P.O. Box 8896 So. Lake Tahoe California 94705	Mr. James Jordan (916) 541-0246
Reno, NV	6-6-75 (372,530)	Washoe Council of Govts. 417 Forest Street Reno, Nevada 89502	Mr. Frank Freeman (702) 329-6314
Carson City, NV	6-6-75 (140,510)	Carson River Basin Council of Governments P.O. Box 1927 Carson City, NV 89701	Mr. Robert Sullivan (702) 885-4680
Tucson, AR	6-6-75 (962,230)	Pima Association of Governments 405 Transamerica Bldg. Tucson, Arizona 85701	Mr. Paul Mackey (602) 792-1093
Ventura, CA	6-13-75 (928,000)	Ventura Regional County Sanitation District P.O. Box AB 181 So. Ash Street Ventura, CA 93001	Mr. John A. Lambie (805) 648-2717
Clark Co., NV	6-13-75 (773,880)	Clark County Board of County Commissioners Clark County Courthouse 200 East Carson Avenue Las Vegas, Nevada 89101	Mr. Jack Petitti (702) 451-1066
Monterey, CA	6-18-75 (829,500)	Association of Monterey Bay Area Governments AMBAG 1011 Cass Street P.O. Box 190 Monterey, CA 93940	Mr. William Hood, Jr. (408) 373-8477
San Diego, CA	6-18-75 (1,339,280)	Comprehensive Planning Organization of San Diego County Suite 524 Security Pacific Plaza 1200 3rd Avenue San Diego, CA 92101	Mr. Richard J. Huff (714) 233-5211

Region and Area	Designation Date (Grant Amount)	Agency	Contact
San Francisco, CA	6-18-75 (4,302,890)	Association of Bay Area Governments Claremont Hotel Berkeley, CA 94705	Mr. Revan A.F. Tranter (415) 841-9730
Guam	6-18-75 (286,180)	Guam Environmental Protection Agency P.O. Box 2999 Agana, Guam 96910	Dr. O.V. Natarajan (Overseas Operator)
<u>Region X</u>			
Portland, Oregon	11-18-74 (1,110,000)	Columbia Region Assoc. of Governments 527 S.W. Hall Portland, Oregon 97221	Mr. Tom Lucas (503) 221-1646
Salem, Oregon	11-18-74 (446,400)	Mid-Willamette Valley Council of Governments Civic Center, Rm 305 Salem, Oregon 97301	Mr. Larry Frazier (503) 588-6177
Eugene, Springfield, Oregon	11-18-74 (670,400)	Lane Council of Govts. 135 6th Avenue East Eugene, Oregon 97401	Mr. L. Douglas Halley (503) 687-4283
Pocatello, Idaho (Bannock/Cariboo County)	3-25-75 (425,000)	Southeast Idaho Council of Governments 209 E. Louis Box 4169 Pocatello, Idaho 83201	Mr. Scott McDonald (208) 232-4311
Ada/Canyon County, Idaho	4-2-75 (414,300)	Ada/Canyon Waste Treatment Management Committee 525 W. Jefferson Boise, Idaho 83702	Mr. George J. Pattis (208) 345-9510
Clark County, Washington	4-9-75 (521,000)	Regional Planning Council of Clark County 2400 T Street Vancouver, Washington 98661	Mr. Richard Hines (206) 699-2361
Seattle, Washington	4-22-75 (850,000)	Municipality of Metropolitan Seattle Pioneer Building 600 1st Avenue Seattle, WA 98104	Mr. Donald J. Benson (206) 447-6666

Region and Area	Designation Date (Grant Amount)	Agency	Contact
Panhandle District, Idaho	5-27-75 (485,000)	Panhandle Planning & Development Council P.O. Box 1154 Coeur d' Alene, ID 83814	Mr. Bruce Thompson (208) 667-4619
Medford, OR	6-3-75 (318,000)	Rogue Valley Council of Governments 33 N. Central, Suite 211 Medford, Oregon 97501	Mr. Jeff Gibbs (503) 779-7555
Snohomish, WA	6-3-75 (950,000)	Snohomish County Metro- politan Municipal Corp. Snohomish County Admin. Bldg. Everett, Washington 98201	George F. Sherwin or Hayden Street (206) 259-9357

# REGION 1



# 208

## AREAWIDE MANAGEMENT

REGIONAL 208 MAPS

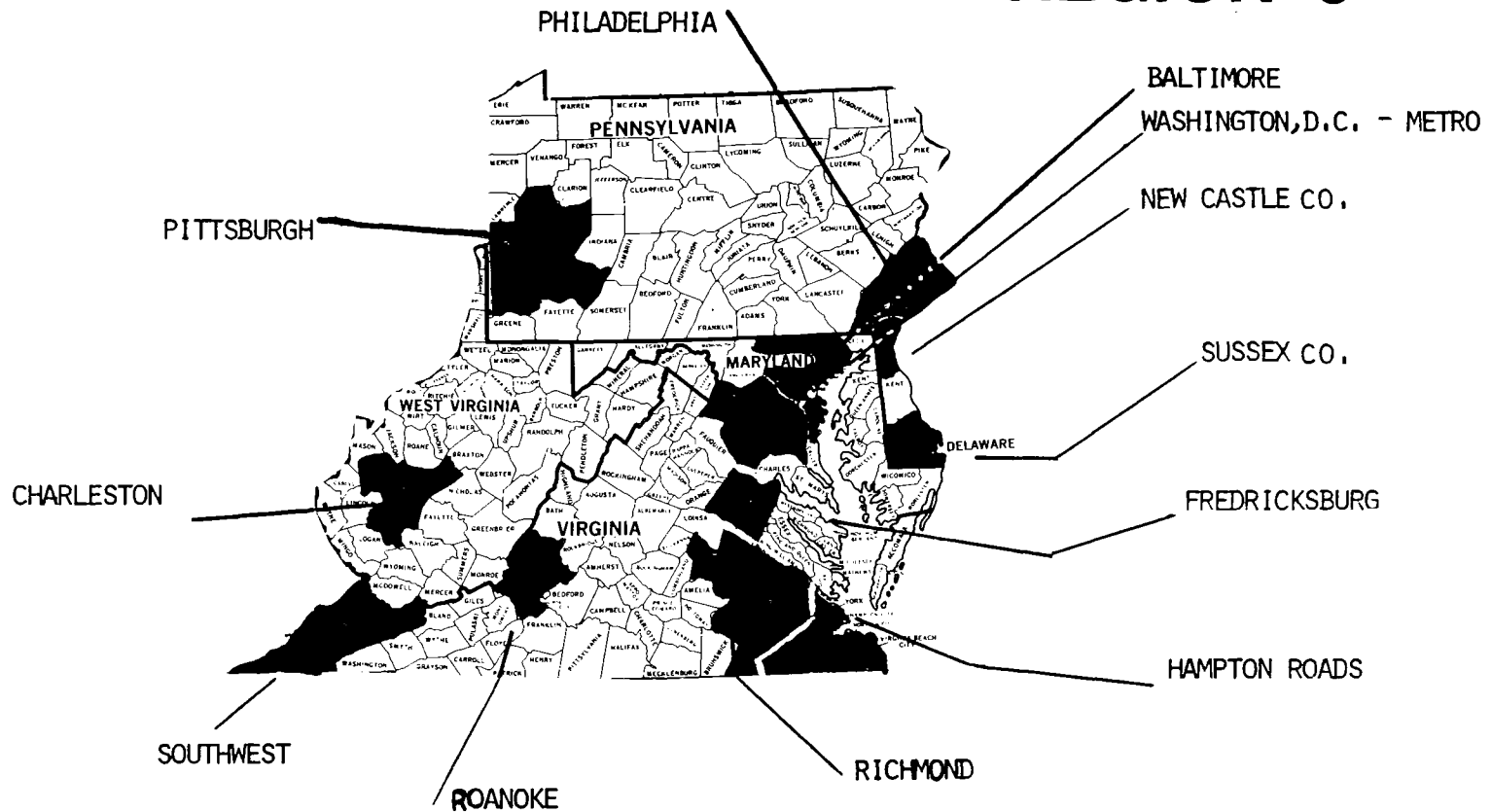
APPENDIX C

## C-2



# AREAWIDE MANAGEMENT

# REGION 3

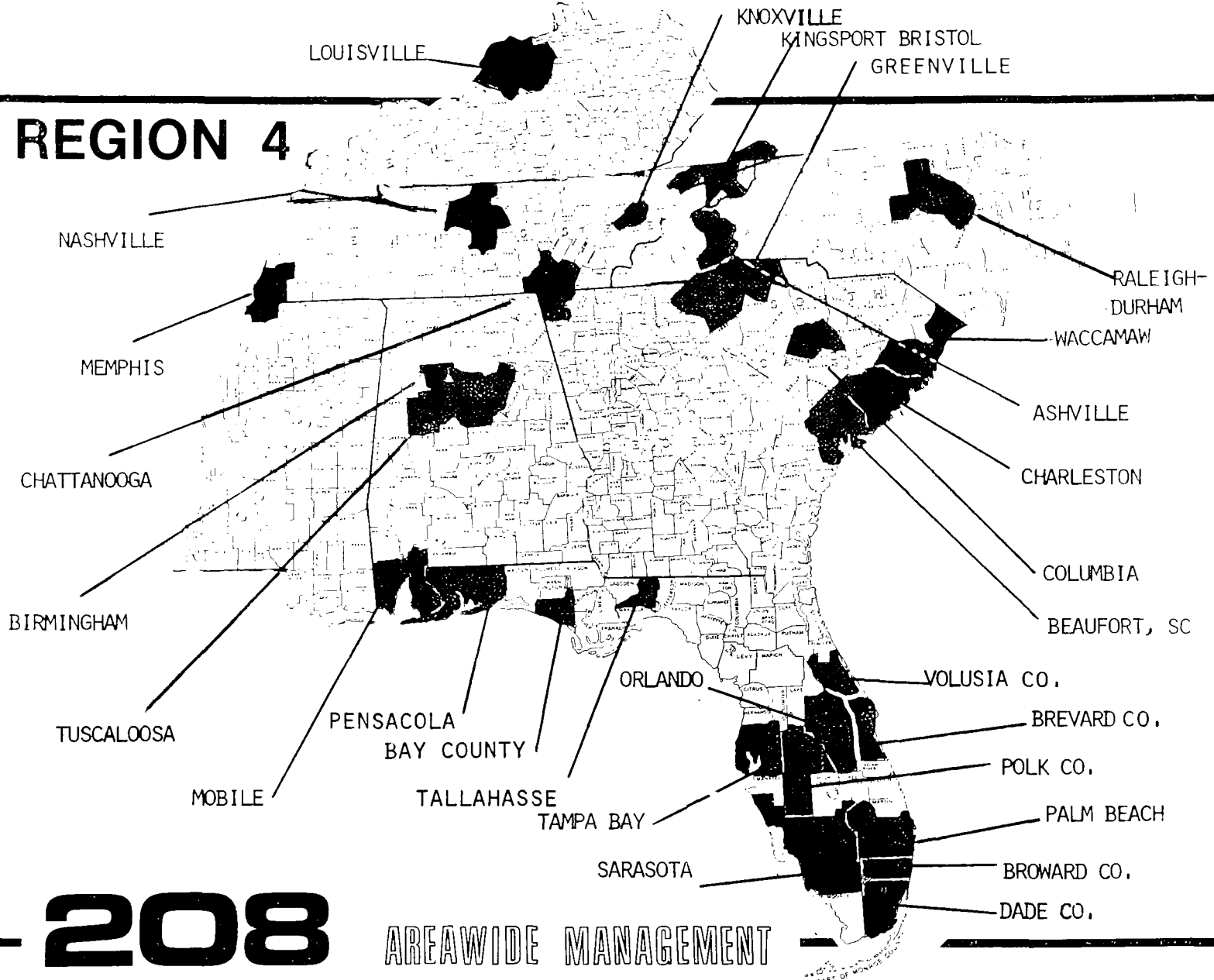


208

AREAWIDE MANAGEMENT



# REGION 4

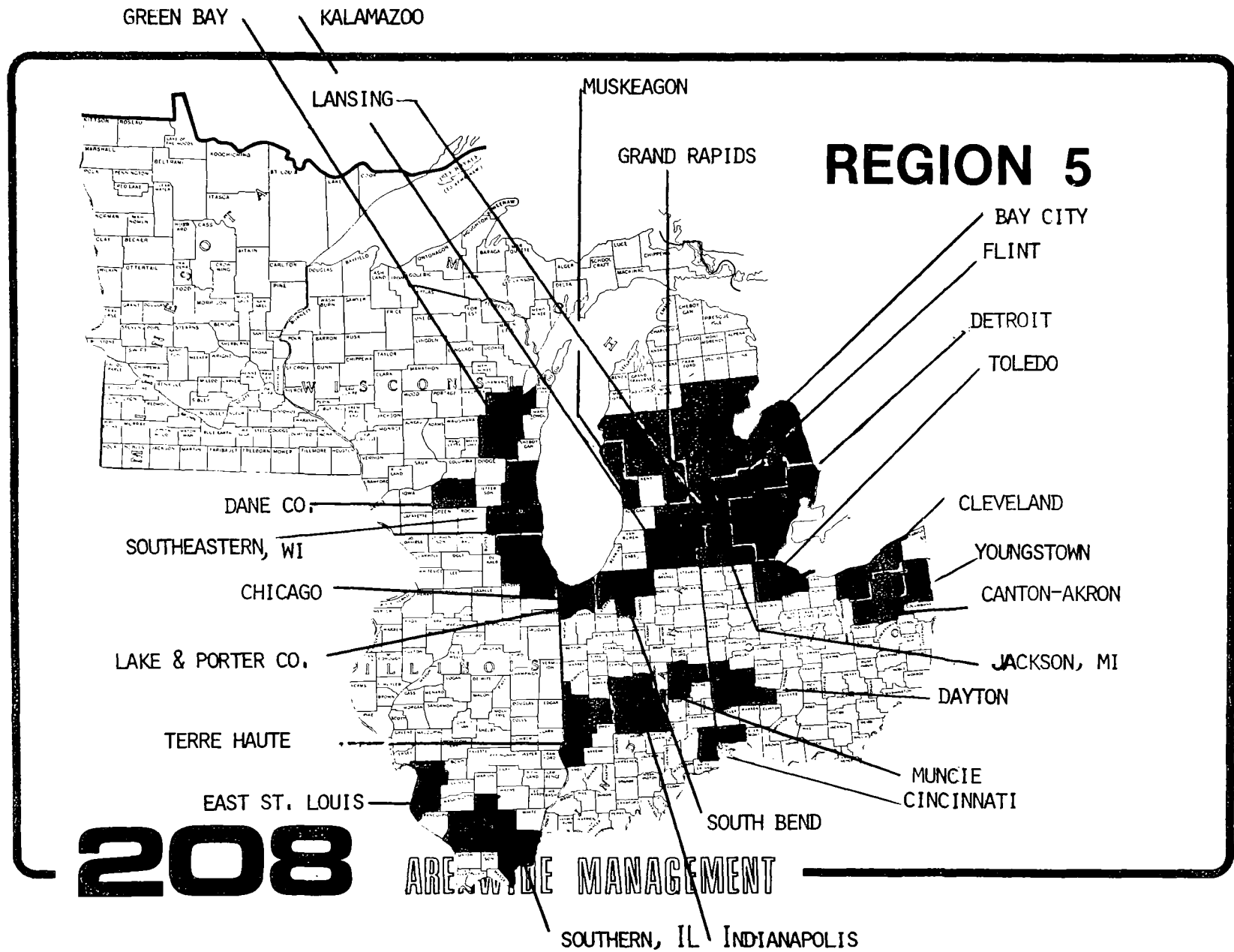


C-4

# 208

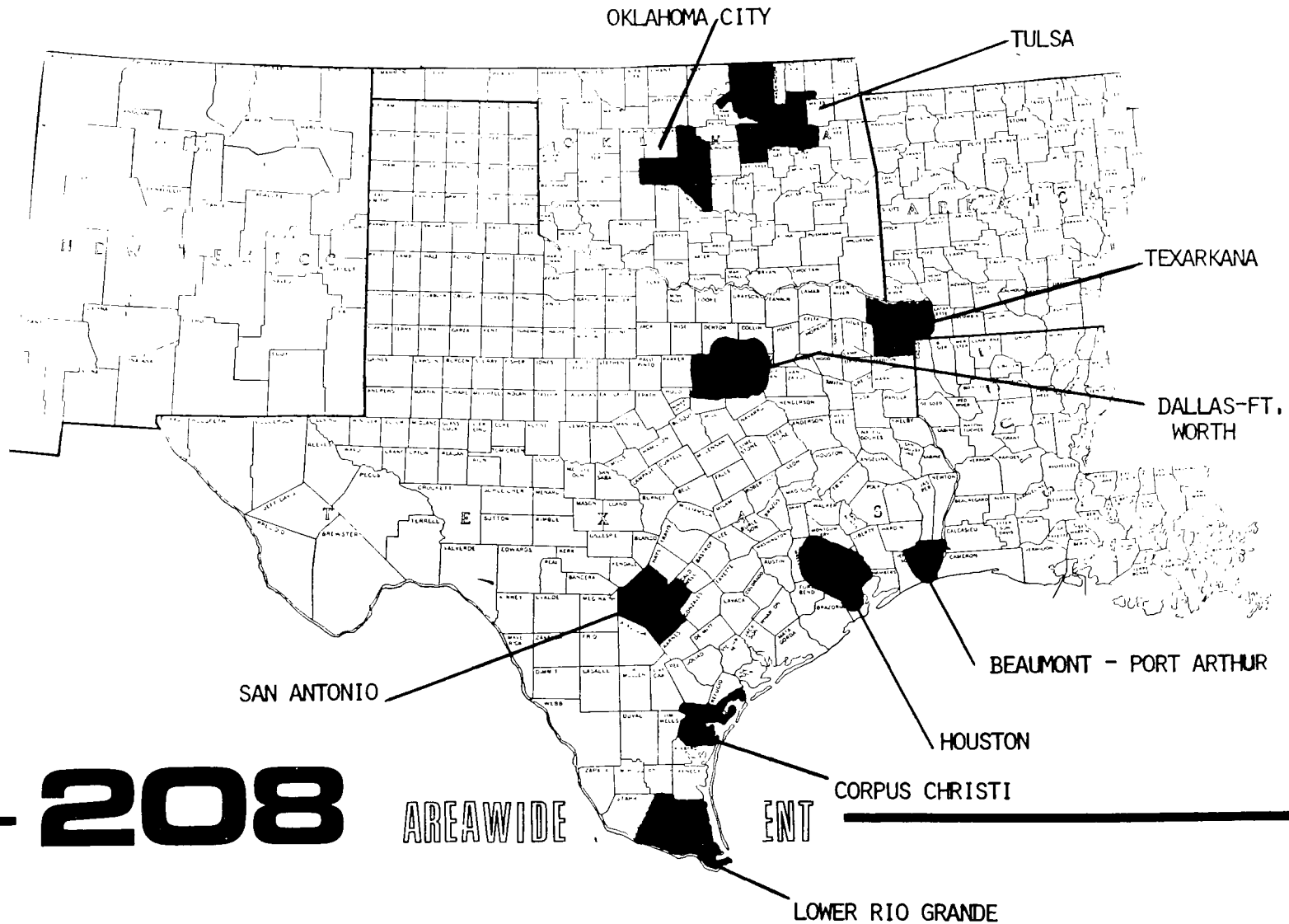
## AREAWIDE MANAGEMENT

C-5



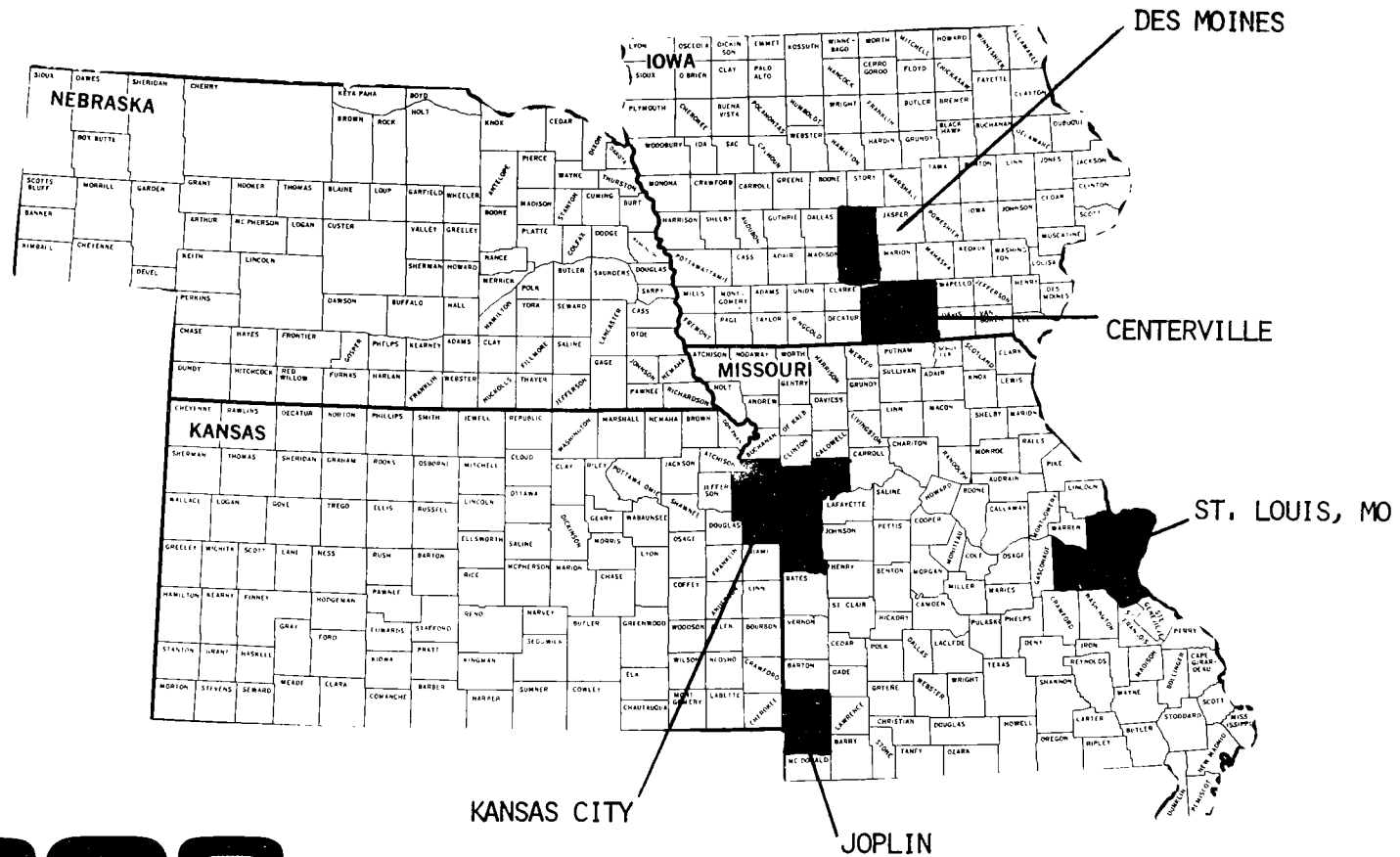
# REGION 6

C-6



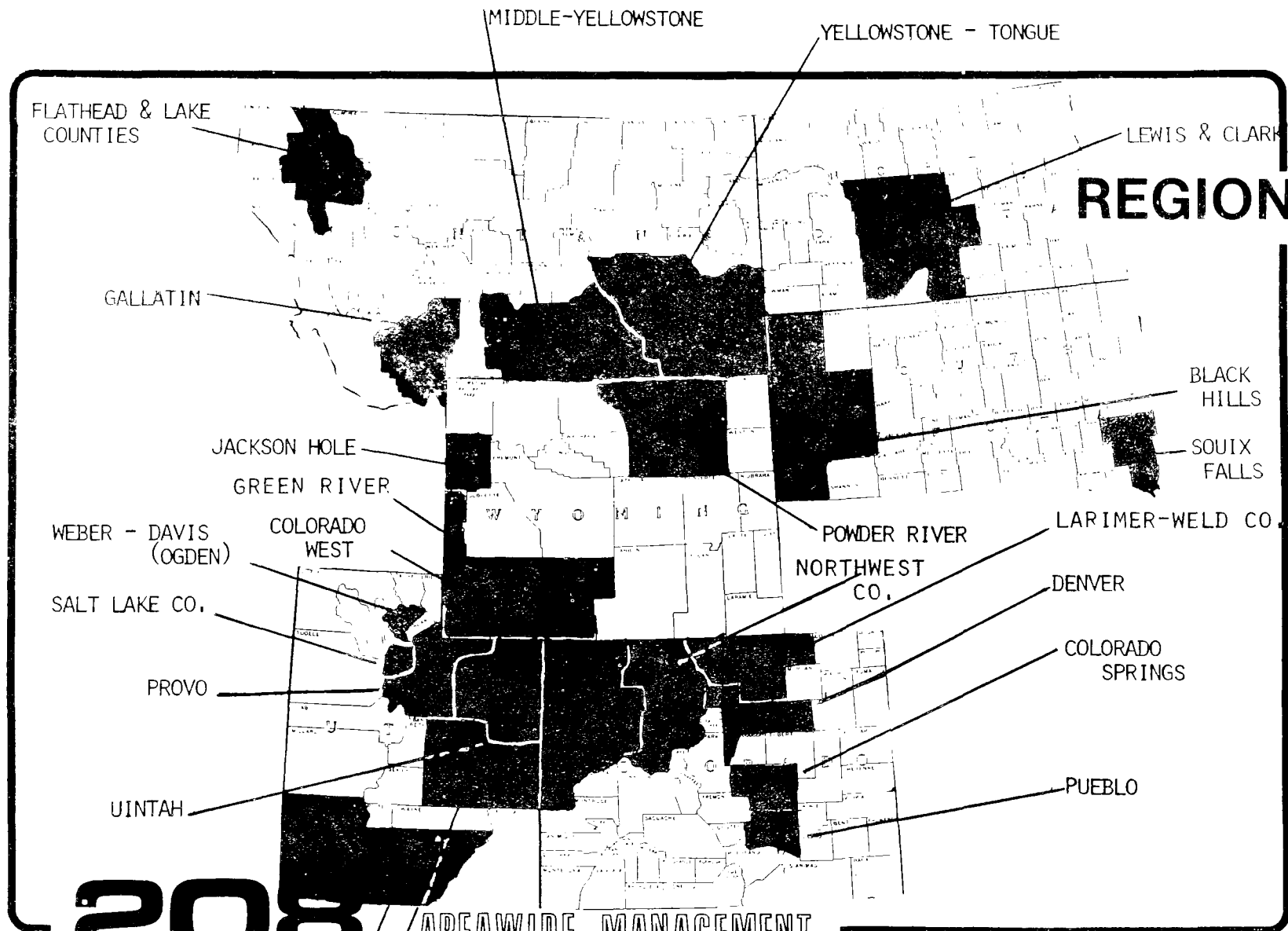
# REGION 7

C-7



# 208

## AREAWIDE MANAGEMENT



208

AREAWIDE MANAGEMENT

SOUTHEASTERN  
FIVE COUNTIES, UT

RENO

CARSON CITY

REGION 9

LAKE TAHOE

SAN FRANCISCO

MONTEREY

(GUAM)

VENTURA CO.

SAN DIEGO

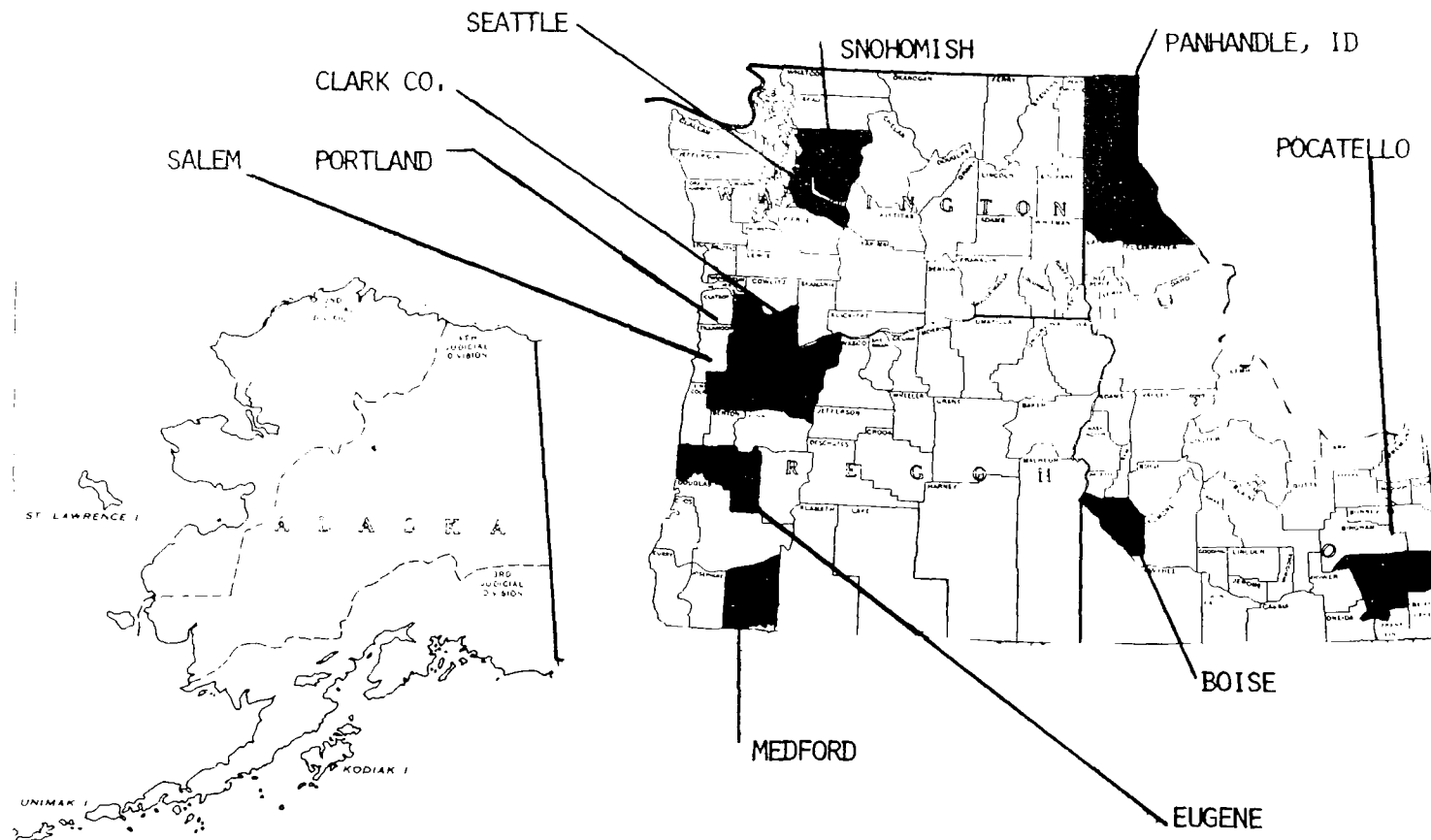
CLARK CO.

TUCSON

# AREAWIDE MANAGEMENT

C-10

# REGION 10



# 208

## AREAWIDE MANAGEMENT