

Friday, March 20, 2020

1:00-3:30 PM

## CWSP Stakeholder Engagement Meeting Minutes

### **In Attendance**

- Vermont DEC – Neil Kamman, Chris Rottler, Ethan Swift, Rachel Wood, Emily Bird, Angie Allen, Danielle Owczarski, Ben Copans
- VAPDA/ RPCs – Charlie Baker, Dan Albrecht
- VACD/ NRCD – Gianna Petito, Holden Sparacino
- WUV/ WRP – Mary Russ, Lyn Munno
- GMWEA – Amy Macrellis
- LCC/ Water Caucus – Jared Carpenter
- UVM - Christopher Koliba
- VHCB - Karen Freeman
- Clean Water Board – Jim Giffin
- CLF - Zach Porter

This meeting was completed remotely over skype due to COVID-19 and the need for social distancing.

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### Agenda

1. Housekeeping/COVID-19 Updates
  2. Review of notes and “decisions document” 3/6/2020
  3. Presentation by Emily Bird on Funding
  4. Chris Rottler on Liability
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### **Housekeeping**

#### Housekeeping/COVID-19

- Check in with members of the AG considering the current COVID-19 pandemic
- Have people heard from districts, as people are cancelling in person meetings, that some might find it difficult to respond the RFP and the process?
  - Dan A. Next weeks meeting with Winooski basin will be held online moving forward
  - Possible extension of RFP deadline given COVID-19 effects?
  - Received questions on what the page limits are and what is considered part of page limits?
    - People should submit questions through the formal RFP process
  - Some municipalities are expressing concern of COVID-19 affecting projects getting done and having to adhere to open meeting laws during social distancing practices.
  - Concerns raised that those applying to be CWSP are just getting up to speed and this delay due to COVID-19 may dissuade folks from putting in a proposal.
    - Members asked to reach out groups and share information with DEC as things evolve day to day
  - Marli Rupe following up with key partners on how COVID-19 is changing operations and gathering information on how to accommodate potential delays

- and projects on a larger scale than just Act 76. This relates to upcoming timing and funding opportunities as well as how to work together moving forward
- Ethan: in regard to delays due to COVID-19 affecting decision making and open meeting laws due to lack of in-person attendance and achieving quorum...wonders if RPC requires in person attendance?
  - Charlie: Legislature is actively working on amendments to open meeting laws and have already allowed remote meetings. All will have to figure out how to adapt to completing meetings in a different way. Completed a board meeting completely remotely and received great participations but requires discipline to interact online. Will check in on people with proposals to determine challenges they are facing in applying.
  - Karen Freeman: knows that town clerks aren't currently open to public and having a ripple affect especially with attorneys trying to get things signed
  - Holden: What is the process for asking general questions on the RFP?
  - Jared: Changing topics and taking advantage of Emily Bird being present on this call, have you guys started looking at the numbers that impact clean water fund (FY 21 budget and funding) due to effects from COVID-19?
    - Emily: nothing quantitative as of yet, but this issue is on our radar and will stimulate an internal conversation on how to best monitor this and the potential affects for revenue.

### **Review of Notes and "Decisions Document" from 3/6/2020**

- No changes to notes from 3/6 requested
- Questions on decisions document
  - Concerns raised about the 80/20 split and the rubric being heavily weighted by state with not much local level with the 20%
    - 80/20 not final distribution, show how weighted prioritization may look, the 20 may come from BWQC
    - Is the 80 all metrics that are objective and developed by state and the 20% subjective?
    - Informatics will feed formula grants base on pounds of phosphorous, models will project pollution reduction values and the 80% will reflect the environmental benefits from a clean water perspective.
    - Natural resource projects may reflect different ways with different variables that inform what the overall percentage may be such as attenuating sediment.
    - 80% may not reflect P reduction only, there are other factors on how will be accredited
    - Dan: Document was previously sent around with a bunch of co-benefits and encourage people to look at that
    - Question of who sets the rubric for the 20%: sounds like the entire rubric is set by the state including the 20% that would be aimed at local prioritizations and co-benefit facts, is that correct? BWQC and CWSP don't get to set that 20%?
      - Answer: this is something for guidance and cannot be given an absolute answer at this time, trying to assume that BWQCs would provide basin specific values to overall pollution reduction value, dependent on determining project development phases. The intent is not for the state to provide a short list of projects to achieve P reduction values.

- Holden: If two basin want to develop two different rubrics, would they have that option or is that rubric determined and weighted by the state?
      - Want to give BWQC some ability for local input and should have flexibility on how they approach the local priority on a basin by
      - Want consistent informatics across the basins since it would be more helpful
      - All a matter of guidance and would be helpful if it remained standard across the basins however each basin has that are specific to that location that may determine the types of co-benefits.
      - Dan: Goal is pollution reduction and that is the only goal that matters. It is critical that the state keep it 80/20 or even higher so as to not appear to be spreading the money around and maintain credibility
  - Lyn: concerns raised that project ranking and selection process isn't in the decision form, wanting to highlight how important and complicated this part of the process is and can benefit us with more information when making decisions down the road since different project types have different prioritizations. Need to come up with the universe of types of projects that we are looking at.
    - Add this topic amongst others such as informatics to the agenda for meeting in May
  - Reminder that decisions document will be added to after each meeting and is a running list of items generally agreed upon and will be changed or clarified along the way
    - AG will be assisting on developing rules and guidance and this decisions document is a running tally towards that
    - May be just draft but it is going to out groups that may want to take a role as CWSP or BWQC, change decisions document at project ranking selection to the first bullet as being the BWQC coming up with priorities for their basins to start that process
    - Toolkit will be given beforehand to CWSP to being that conversation
    - Charlie: helpful to talk about partners developing ideas and voting on funding

#### **Emily Bird presentation and Q&A 23:10**

- See recording of presentation
- Question and Answer after first section of the presentation:
  - Gianna: How much is allocated to the basin, guidance to the CWSP on how much is drawn down, how do you envision this playing out?
    - Using a specific project example to visualize this. CWSP could bundle invoicing and could draw down in whatever frequency works for them. Need a standard structure for what the expectations are and funds being drawn down up to a certain ceiling is important. This will help translate that basin wide P reduction target into widgets. Don't need to get project to 100% construction in order to draw down. Ensure project steps are completed before project funds are expended
  - Jared: Would the annual funding fluctuate and still remain in the five-year allocation target? So, it may be each year but still hit the same amount at year 5 regardless?
    - How does the MRGP work with the annual obligation step?
    - With MRGP model it's a multiple year agreement with a standard scope of work that doesn't change year to year. The obligation and funding associated is determined on an annual basis. This allows us to create one agreement without

getting ahead of the annual appropriation of the state budget. And avoid executing multiple agreements to reduce workload and roll funds one year into the next. That would enable funding to fluctuate on an annual basis. This would be a 5-year budget target for each CWSP and that would be fine-tuned and determined on an annual basis based on project portfolio that CWSP is working on. Say 100 lbs banked and likely only to make it through 60% project in the next year, use mocked up payment schedule to determine what is a reasonable and conservative (with buffer) for annual allocations and obligations would look like.

- What is the “Hoyle and Tanner” contract?
  - A contract that was awarded to Hoyle and Tanner to help with analysis of developing standard costs per project outputs for all types. This will provide the basis for project costs, and these will be parsed out into incremental project steps and based on project outputs. State translate that into P formula. Second track – establish O&M standards and standardized funding
  - Ethan: Have discussed consultant work in previous meetings, didn’t call it Hoyle and Tanner due to the contract not yet being awarded at that time.
- Charles B: concerned about basing formula on a calculation based on projects. Thought it was going to be based on the pollution reduction gap in the watershed.
  - Neil: total amount of money in formula grant will be dependent on P reduction based on non-reg projects. Project by project funding approach is an ability to make sure there is money flowing to pay for projects as going along
  - Emily: 5-year P reduction target with a tool that would say you have this much P reduction banked currently in 30%, x in 60%, and x in construction: projects aren’t magically constructed. Goal was to enable these groups to have some way of visualizing and quantifying P reductions banked at different project steps. Set guidelines and expectations of annual progress on annual and 5-year basis and enable ramping up of projects.
  - Charles B: pot of money available each year but could really use some clarity about DEC doing this or responsibility of provider doing each of these things at each step, what are the expectations between DEC and CWSP?
    - Emily: set standardized payment schedule for different project types with standard equation with anticipated P reductions and cost per unit P would indicate the ceiling. Results of contractual work underway to set a standard for the different project steps base on project type. CWSP would be able to know what payment schedule would look like based on project type and anticipated P reduction would be.
  - Charles B: say it’s a million \$ allocated to basin to do this work, is DEC holding all that money in each step and CWSP has to ask at each step for the money? Or is the CWSP holding some portion of that funding? Small partners might be wanting to access funding, might need to have some front-end funding, based on a reimbursable basis, worried making too much work for DEC again and not getting at intention of the new system.
    - Emily: in the MRGP Grant and Aid program, some admin funds are frontloaded while work is still on a reimbursement basis but meant you didn’t have to achieve construction to get money. Giving CWSP capabilities to draw down funding for annual start up activities up to a

certain ceiling is an option. Would then be in pace with project costs. This is reimbursement based. Need to be data support tools developed related to this. Wouldn't be expecting DEC to be in the minutia of these individual projects this would just indicate payment schedule that a CWSP could request money on a cumulative basis. Expectation that there will be DEC review during check points. Basin planners need to be in the loop.

- Neil: expecting a lot of construction all at once will need to front load into system. Model will bill against formula grant for x 30% for this type or x # constructed and have money flow in. But good point on the start up money.
  - Charles B: concerned with all the partners and trying to get that first 10-20% of the work that needs start up money to go to partners. Not able to wait 3 months for a reimbursement.
  - Note: this is a valid point of continued consideration to be further developed by DEC.
- Lyn: how do project identification and development fit into the project selection model proposed?
  - See Emilys exemplar table from presentation
  - Lyn: Project Id and Development may require investigating 20 different projects that only have a couple come to fruition. DEC has been great in providing that development funding to conservation districts to be able to do that outreach with landowner. Not necessarily tied to a particular project. Hard to figure out how that work happens and gets paid for.
    - Emily: Not required for project identification to be part of the formula grant. It is possible to peel out some of that project development identification activities into a separate activity that may not be part of the formula grant. Open to ideas and check language in statute
    - Lyn: Done in a couple ways, separate granting process within DEC, but it almost seems like something the BWQC may decide want to do project development work in a certain sub watershed and want to put some pool of funding towards landowner outreach in a given area. Being able to have those pools of money that aren't allocated in a percentage way that would be available to develop proposal that may then go through the prioritization process at a later time.
    - Emily: definitely open to that, mean peeling off some portion of money and having pool that is not part of formula for this activity. Or maybe could be a formula of its own. Formulas provide efficiency. Wouldn't be based on P
    - Lyn: Connected, x% of money put towards project development work not tied to particular project. Up to BWQC to come up with ideas where to put resources for project development efforts.
    - Neil: 5 year granting cycle opportunity exists that more money into development in year 1 and 2 and construction in later years
    - Lyn: luckily we are not starting from scratch when this comes online. Always a need for the project development funds to do landowner outreach and could be continuous.

- Charles B: cost per unit is an average. How would it be handled if the cost in a given circumstance is higher? Shouldn't that be at BWQC discretion and not DEC?
  - Conservative cost per unit P = very conceptual, project ceiling set on upper side to ensure it will be raising funding to get projects done. Intent of formula grant is to set pay for performance approach and priority based on cost effective projects. May be a project community wants to move on due to co-benefits but may not be as cost effective from a P reduction standpoint, would need a different cost share to support that cost. We want to set formula in realistic manner, support projects getting done, but done with sidebars.
  - Charles B: Appreciate notion of conservative costs, hearing State controlled decision making process and very little BWQC control over decision making process that concerns me. Agree to guardrails. But if locally they invest in a project – would DEC have veto power? This model has to allow CWSP and BWQC to make own decisions and own risk, needs balance that not hearing about local role
    - Neil: point here is not to take away from BWQC decision making on prioritization of projects. The point is by forthrightly selecting a higher cost per unit of P we are going to guard against project cost overruns that would keep money in system in formula grant to make projects able to happen. Haven't talked about 30/60/90 yet and state is trying to find a balance to avoid doing what is done now.
    - Emily: intent of setting payment schedule is not the state will be sole decider on this, intent is to have transparent payment structure so CWSP knows when/where/how much funding available on a project by project basis without having to put a project budget proposal before state. Set up tool/calculator where you would have everything you need with formula approach to determine P reduction and see how much money can be drawn down and take guess work out of how much money would be available.
    - Charles B: Need more clarity on where DEC is making the decision and where BWQC and CWSP are making the decisions.
    - NOTE: This is an important consideration that Ethan is working on with internal staff...to develop the least-overhead approach to ensuring projects are permissible and have WQ benefit at the earliest stages of investment.
- Chris K: scope and sequence of how functions are described, are we looking into design a performance based block grant system that devolves a lot of the project management to basin or are decentralizing decision priorities but still keeping a strong state handle on specific project management. Perception we are getting now would be latter. Does create/shifts back to state and less on CWSP. Is this a performance-based block grant program or something other?
  - Neil: point from Emily is just a mechanism to clarify how a payment will be drawn down, strike middle ground to between state and CWSP oversight
  - Emily: may need to fine tune/work on better articulating what it will look like
  - Chris K: overarching vision needs to be lead with and then show how funding will flow to avoid confusion
  - Emily: Work on better articulating bigger picture before getting at project level

- Neil: What's program delivery/admin what's not – put hold on conversation till next time
  - Holden: Hope that conversation happens at some point, help with understanding of how this breakdown functions
- Chris K: what the suite of non-regulatory projects might be
  - Neil: whole suite of them, exemplar table may have fewer columns for one project vs another and rates would be different
  - Chris K: at future meeting share the list or email around. Talked about getting a handle of what lies within the bucket of non-regulatory and what doesn't.
  - Lyn: what I was referring to earlier on what we need to be more specific on project selection and would want to dive into that more fully at a future time
  - Ethan: We can look at the longer list, very broadly there are 6 overarching project types with subcategories: wetlands restoration, floodplain/stream restoration projects, dam removal, river corridor/wetland easements, woody buffer planting, lakeshore retrofits and lake wise projects, sub jurisdiction GSI and jurisdictional GSI providing CWSP meet targets
  - Emily: may be potential for forest related remediation practices, 10% agricultural reductions will occur within the formula grants
  - Ethan: legacy erosion from old forestry practices, RAPs, topic of later discussion
  - Emily: Amy M described the below list of clean water project categories, put non-reg screen over that list that is most likely what we are picturing. Ethan: Here is the list:

Clean Water Project Type	Standard Project Output Metric	Special Considerations
<b>Land Use Sector: Agriculture</b>		
Forested Riparian Buffer	Acres of buffer restored	
Filter Strip Riparian Buffer	Acres of buffer restored	
Forested Ditch Buffer	Acres of buffer restored	
Filter Strip Ditch Buffer	Acres of buffer restored	
Grassed Waterways	Acres of field treated	
Hay Field Riparian Buffer	Acres of buffer restored	
<b>Land Use Sector: Developed Lands</b>		
Stormwater - Bioretention	Acres of impervious surface treated	Assume treatment of existing impervious, and may be with or without underdrain
Stormwater - Extended Dry Detention Pond	Acres of impervious surface treated	Assume treatment of existing impervious
Stormwater - Grass Swale	Acres of impervious surface treated	Assume treatment of existing impervious
Stormwater - Gravel Wetland	Acres of impervious surface treated	Assume treatment of existing impervious
Stormwater - Infiltration Trench	Acres of impervious surface treated	Assume treatment of existing impervious

Stormwater - Subsurface Infiltration	Acres of impervious surface treated	Assume treatment of existing impervious
Stormwater - Surface Infiltration	Acres of impervious surface treated	Assume treatment of existing impervious, includes infiltration basin
Stormwater - Wet Pond	Acres of impervious surface treated	Assume treatment of existing impervious and/or expansion of an existing wet pond
Stormwater - Porous Pavement	Acres of impervious surface treated	Assume treatment of existing impervious and may be with or without underdrain
Stormwater - Sand Filter	Acres of impervious surface treated	Assume treatment of existing impervious
Road Project - Full MRGP compliance on unpaved roads	Linear feet of road improved	Installation of a suite of practices to bring unpaved roads with ditches into full compliance with Municipal Roads General Permit (MRGP) standards
Road Project - Full MRGP compliance on paved roads with ditches	Linear feet of road improved	Installation of a suite of practices to bring paved roads with ditches into full compliance with MRGP standards
Road Project - Full MRGP compliance on unpaved Class IV roads	Linear feet of road improved	Installation of a suite of practices to bring unpaved Class IV roads into full compliance with MRGP standards (typically involves gully erosion remediation)
Road Project - Full MRGP compliance on paved road with catch basin	Cubic feet of erosion remediated	Installation of suite of practices to remediate gully erosion at catch basin outlet
<b>Land Use Sector: Forest Lands</b>		
Forest - AMP compliance	Linear feet of practices, or acres of watershed improved.	Implementation of <i>Acceptable Management Practices (AMPs) for Maintaining Water Quality on Logging Jobs in Vermont</i>
Forest - Historic/legacy erosion remediation-roads and trails.	Linear feet of practices, or acres of watershed improved.	Installation of erosion remediation practices addressing historic/legacy erosion. Use AMP standards
Forest - Road and trail improvements	Linear feet of road/trail improved, or number of practices implemented	Forest road and trail improvements not applicable under the Municipal Roads General Permit road classifications (i.e., forest roads and trails not comparable to municipal class 1-4 roads) Use AMP standards
Permanent Stream crossings improved	Based on size of structure, or drainage area	Use AMP standards for intermittent streams. For perennial streams must use Stream Alteration Permit.

Forest-road or trail closed or relocated	Linear feet of road or trail closed or relocated	Use AMP standards
Forest- Recreation trail improvements/relocation	Linear feet of trail improved/relocated	Follow BMP's for trail type, IMBA, VAST, GMC, CTA, USFS
<b>Land Use Sector: Natural Resources</b>		
Lake Shoreland	Acres restored	Implementation of lake shoreland habitat restoration projects such as erosion reduction, soil encapsulated lifts and shoreland plantings
River - Planting (Riparian Buffers)	Acres restored	Average minimum buffer width of 35-foot required with minimum of 300 stems per acre, planted with native woody vegetation
River - Floodplain/Stream Restoration	Acres restored	Includes berm removal, encroachment removal, and floodplain restoration/reconnection
River - Dam Removal	Acres restored	Based on acres of floodplain and stream restored as a result of dam removal
River - Corridor Easement	Acres conserved	
Wetland Restoration	Acres restored	

- Holden S: BWCP participation mentioned, I believe this also should include TBP activities?
  - My understanding is that TBP is linked to BWQC participation and wanted to double check that is accurate
  - Neil: different funds will support BWQC... formula grant would provide for BWQC statutory partner participation when doing project selection, assignments, etc. TBP funds intended to support statutory partner engagement at basin council "table." Statutory partners supported with Formula: BWQC members. Statutory partners supported with TBP: VAPDA, WUV, NRCC. Depending on what council is working on projects its part of formula grant if council is working on basin planning would be part of basin planning funding.
  - Emily: didn't include it yet, still some details to be sorted out due to statewide statutes for basin planning and how that would be eased out statewide vs basins with CWSP. Thinking is that peel off portion of that an integrate into award of CWSP.
  - Neil: mindful that two pieces of statute that interrelate and interrelate them on ground, wouldn't be formula grant on Basin planning



- Lyn: will be helpful to have that clear as implementors are working on projects over next couple years because right now there isn't that funding and folks might be delaying doing work if O&M would be included in the future and isn't being included on work being done now or in past
    - Neil: excellent point, put some thinking around that
- Emily goes over second section of presentation on SFY 21 spending plan for funds available July 1, 2020 would like to be able to support CWSP start up activities.
  - Holden: Want to know TBP/BWQC funds if there is a process of how that amount will be assessed and that will take into account current costs/needs? What the process is for assessing that 500K is sufficient?
    - Neil: 500K for basin planning and BWQC participation. As noted above there are two funding sources. For startup year, TBP + some CWSP Startup funds for BWQC support.
    - Ethan: heretofore we have structured them on the fiscal year cycle VAPDA and NRCC, specific to where we have various basins within the TBP queue. Has been an al a carte approach to being able to parse out the different work plans and associated task that each of those entities would undertake for each conservation district or planning commission under the umbrella of each TBP grant agreements. Going forward this will be interesting formulaic approach on how we best disperse those funds. Needing to continue to develop [TBP on a cycle of our schedule \(link on website\)](#). Will be supporting TBP participation for all of our statutory partners using 500K going forward and certainly for upcoming FY to continue provide support in order to participate. Question will be how much transition will be required, entities transforming to TBP model and framework. Look at funding available and distribute geographically as well as to develop new work plans that would reflect to transition to act 76 framework.
  - Mary: Fourth bullet "Policy for CWSP direct implementation competition?", clarify one process for project selection, curious if this bullet relates to something else? Think about messaging and don't want to send the wrong message
    - Chris R: gets back to COI, topic that we need to come back
    - Lyn: Why is that under this list? That seems complicated especially given discussion that all projects go through BWQC? Make that clear.
    - Neil: What we mean is "Develop conflict of interest policy."
    - Chris R: Provision in Act 76 that states local has to develop own sub-guidance, provide money towards that is Emily's intent
  - Charlie: Is there a specific amount proposed for the FY21 budget for CWSP start up activities? If yes, how much has been budgeted? (not asking for commitment knowing that there is more work to be done in the legislature.)
    - Emily: not a specific start up budget at that level, one of the line items is title "multisector basin partner support" administered by CWIP, we provide greater detail within annual spending plan. This is really going to be determined as we go through process this month and building this spending plan. Looking at other budgetary priorities and how much we can peel off to support this activity. Next real step is getting more input from AG on what start up activities will look like and reasonable budget?

**Liability: CWSP Risk of Loss – Chris Rottler**

## 1.Events

- a. **Project is installed, but is a lemon – failing within 2-4 months of installation due to poor design/construction (payment already issued)**

**CWSP is responsible for working this out with the engineer/contractor. Insurance and/or risk reserve for any losses.**

- b. **Truck in the rain garden... i.e, an unintentional accident, may or may not be insurance.**

- c. **Project is maintained but fails before its design life.**

- d. **Project fails due to 'Acts of God' – rain, hurricane, vandalism that can't be fixed with restitution.**

- Chris R: Removed things that happened during the construction phase and assume remains in purview of construction firm
- Feedback from group about various scenarios and what they think will happen.
- Availability of insurance? Municipalities don't always have insurance and if a practice is on private land the landowner may be able to insure it.
- Neil: Is insurance available for projects on ground?
  - Amy: hasn't been my experience, usually there are maintenance agreements
  - Charles B: not really seen it happen in Vermont
  - Neil: is it in practice anywhere?
  - Mary: voluntary projects like buffers, not a piece of infrastructure so the idea of insurance doesn't come to mind, not run into it
  - Jared: Why? Suddenly you aren't hitting your target due to damaged project.
    - Neil: because we have lost the project we have paid for.
    - Truck in rain garden: would it be covered by truck driver insurance company?
  - Lyn: Decide whether something is fixable through O&M funding or if there is enough loss to re-evaluate the project using implementation funding? Design some guidelines around that maybe.
  - Idea would be a mix of O&M fixing some things, risk reserve might repair some things, and some things you can't control
- Emily: Amy's point about not wanting anyone to be penalized for projects failing is very well taken and the goal of incremental payment is that even if a project fails there would be compensation that enables payment and no one would have to sink those costs.

## 2. Missing Targets

**Liability for missing targets is spelled out in the Act and consists of a compliance plan (i.e. a corrective action plan), decertification or loss of status as a CWSP, and/or reduction in funds in the formula grant.**

- Absent are penalties and enforcement actions for missing targets
- Jared: what do you mean? Legislature went in circles and landed on this. Do you want to expand on what the corrective action plant would look like?
  - Neil: guidance would be chapter and verse out of the act, question is whether we want to expand on what a corrective action plan or not?

- Jared: envisioned DEC would look over shoulder more and more if started missing targets, offer more input on what projects should be done. Start to lose some autonomy and at some point if can't hit targets take it away from them and give to someone else
- Charles B: agree with that notion, expected some level of autonomy for CWSP and BWQC but if things aren't going right...this needs to be spelled out. Is it just meeting the targets? Need to add more criteria about skipping check-ins with DEC where permits required.
- Emily: part of the equation is that if your investing in design of project and sinking expenses and project never gets to construction then that is less funding that would be hypothetically available for a project that might have gotten to construction.
  - What role can DEC play to engage?
  - Part of adaptive management throughout 5 year cycle?
  - Sunk costs may not be able to be recuperated
  - Checking in annually to update and how things are panning out in project portfolio
  - Checkpoints would reduce risk in investing in a project that wouldn't make it
- Charles B: really helpful if focus is spent on sub-recipient monitoring and DEC permit compliance that there be enough training of CWSP staff to ensure they are doing what they are supposed to be doing locally.
  - What responsibilities are flowing down to the provider?
  - Versus DEC having to do it?
- Ethan: great interest on guidance and SOP for Basin Planners as well as resource program technical staff, subject matter could be incorporated into guidance
  - Clear communication on expectations would be best
  - Training to ensure these checkpoints would be very important
- Amy: building in contingency into funding formula such that CWSP aren't penalized for projects that are in development/concept design that fail because they aren't permittable or landowner issues.