

Vermont Agency of Natural Resources
Water Investment Division of Vermont DEC

Clean Water Service Network Action Plan
Updated: April 10, 2025

Introduction

The goal of this Clean Water Service Network “Action Plan” is to determine how to most efficiently address the current challenges within the Clean Water Service Network (CWSN), and then to identify the specific actions we can take to address these issues. The intent of this Action Plan is to develop and present this list of actions based on an analysis of CW project data (both for the P reductions achieved to date, as well as the project cost investments) as well as feedback from the CWSPs, BWQC members, project implementers, and stakeholders in the Clean Water Service Network.

Based on the feedback received from three (3) CWSN feedback sessions, including the Clean Water Network Summit and the key challenge(s) we are facing, the rate of non-regulatory clean water project implementation is not on pace in order to meet TMDL non-regulatory reduction targets that focus on natural resource restoration projects. The CWSP model for distributing Formula Grant clean water funding for non-regulatory projects in the Lake Champlain and Memphremagog basins has been operational since the summer of 2021. This is a complex model, and like any new organizational system, there are elements of this framework that require some adaptation and adjustment. These are the 4 key themes that emerged related to the need for adaptive management:

- Theme 1 – Startup of a new complex funding program resulting in confusion in the system.
- Theme 2 – Need for more cost-efficient project types
- Theme 3 – Lack of implementer capacity
- Theme 4 – Lack of landowner willingness to host clean water projects

1. Clean Water Service Network Strategic Priorities

This CWSN Action Plan is intended to identify several near-term actions that the State is already in the process of implementing (i.e., see phase 1 table below), and then several additional actions that are proposing to address in an “effort impact” assessment, and where we may need to conduct additional work-planning to determine what the right solution is to address the identified problem (i.e., see phase 2 table below). Some of the related strategic priorities that DEC see as informing this Action Plan include:

1. Embrace continuous improvement across the Network to make it easier for all stakeholders to benefit from the state's Clean Water programs.
 - a. Assist CWSPs, BWQC members, project implementers, and other stakeholders by providing adaptive management strategies within the CW Service Network that provide transparency, consistency, and ease of access to the state's Clean Water Restoration Formula Grant.
 - b. Develop and employ a data-driven approach to identify and assess gaps within the CW Service Network, and to manage an ever-increasing volume of CW project opportunities, project advancement, and implementation efforts across the CWSN.
2. Further invest in business process analysis and improvement throughout the Clean Water Network in order to build upon and improve stakeholder relationships that create a partnership-based approach with targeted financial and technical assistance that supports clean water for all Vermonters.
3. Foster an inclusive and collegial working culture that embraces communications and workflow management that optimizes the Clean Water Service Network.

Clean Water Service Network Summit, "Band Back Together," and Project Implementer Meetings:

The first 'Clean Water Service Network Summit' was held on April 5th, 2024, with over 70 attendees. The Summit drew participants from various corners of the CWSP basins, including watershed groups, conservation districts, BWQC members, municipalities, land conservation organizations, Regional Planning Commissions, as well as fellow agencies and programs within ANR. The purpose of the Summit was to bring together clean water practitioners who work closely with Formula Grants, to share experiences and discuss challenges and opportunities going forward. The intended audience were stakeholders who are actively engaged as CWSPs, BWQCs or project implementers or other parties actively involved in the implementation of formula grants.

During the event, DEC solicited input directly from attendees through the 'Plus/Deltas' posted throughout the room as well as notes from panel discussions and related to partner presentations. A 'Plus/Delta' exercise was also conducted during the Summit where participants could list either a positive observation, or an observation noting something that they would like to see improved upon or changed. These Plus/Deltas were compiled, and the outcomes are available online [Plus/Deltas](#). DEC also conducted a post-Summit survey and the results of that survey, including the comments received, are also available online in the [Post Survey Summit Survey](#).

One clear benefit of the Summit was the opportunity to hear directly from partners working within this system on how things are going, with an eye to priority actions for making improvements to Formula Grant funding going forward. Reflecting on the Summit, there were some clear themes that emerged from the various presentations, questions, feedback, and discussions. We found it helpful to try to organize what we heard into a list, to help digest the robust feedback that we received while considering the next steps.

DEC also convened a meeting with the directors and principals of the Act 76 partner organizations (including the 3 TBP Statutory Organizations) in June of 2024. The intent of this meeting was to debrief these over-arching partner organizations of the outcomes of the Clean Water Service Network Summit and to solicit additional feedback to identify additional gaps and priority issues that would benefit from additional discussion and to prioritize next steps. One of the outcomes of this meeting was the suggestion to also meet with Clean Water project implementers to better understand what these partners see as current challenges to the CW – Formula Grant system. DEC subsequently convened this CW Project Implementers Roundtable in August of 2024 with a dozen project implementer groups.

These 4 overarching themes (as well as identified gaps in operational processes) and corresponding actions are further described in the Phase 1 and Phase 2 sections of this Action Plan

The Overview of Formula Grant Gap/ Assessment Matrix

The WPP has taken the feedback received and consolidated all of the input from the Summit plus/delta exercise, the post-Summit survey, the TBP Statutory Partners roundtable (i.e., “Getting the Band Back Together” meeting), and Clean Water Project Implementer round table and compiled these comments in a spreadsheet under the following headings:

All feedback was collated and organized by the major themes that emerged from the three partner sessions that were held in the spring and summer of 2024. The WPP sought to identify the perceived-underlying issues in order to inform an “Effort-Impact” analysis that may be used to prioritize the longer-term issues to be addressed by DEC in collaboration with the CWSN and stakeholders going forward. WPP looked closely at the primary drivers of the problem areas in order to determine if there were the contributing factors, any gaps (or assessment needed), the root cause of the issue (if known), potential solutions, an initial analysis of the “effort-impact” associated with addressing the issue, expected outcomes (quick wins summary), the role and responsibilities associated with related actions, as well as the next steps and timeframe.

Approach to Developing the FG Effort-Impact and Gap Assessment Matrix

1. Define the larger problem – e.g. “There are not enough projects moving forward”
2. Identify the bigger picture drivers of this (including the major themes identified from the Summit)
 1. Identify any discrete issues under each of these as necessary – where the actions would be distinct
3. Define the specific action we can take to address these issues
 1. Identify as near term/ long term actions (i.e., Phase 1 and 2 of this Action Plan)
4. Put these actions into an effort/ impact matrix (yet to be conducted with partners)

5. Identify which of these are already moving forward, which are a priority and where we have capacity to pick up next and then determine focus on the next set of priorities on the list.
 1. “Action Plan” format – what we will do, who is the lead, timeline etc.
6. Share with CW partners to solicit additional feedback where we may refine actions and/reprioritize based on this external feedback (and as was the clear message we received from the Clean Water Implementing Partners roundtable session).

The fundamental ‘problem’ is that the pace of CWSP funded projects is not meeting phosphorus reduction targets which is also reflected in the fact that the spending project money is not keeping up with budget allocations. Further, the pace of project advancement is not as dynamic as initially projected, and not increasing at the rate it needs to for CWSP to meet phosphorus reduction targets. This also means the pace of project implementation that will provide the many other co-benefits is slower than desired.

The Effort-Impact Assessment Matrix¹

An Effort-Impact Matrix is a visual tool used in decision-making and project management to assess and prioritize tasks, projects, or initiatives based on their relative effort and potential impact. It helps individuals or teams focus their efforts on ideas that promise significant impact with manageable implementation efforts. It is a valuable decision-making tool that adds structure, minimizes subjectivity, manages complexity, creates consistency, and improves transparency. In this tool, Impact refers to the potential benefits or outcomes associated with completing a task or project. Impact assesses the positive effects, results, or achievements that can be expected. Effort refers to the resources, time, and work required to complete a task or project. Effort is typically measured in terms of complexity, duration, and resource allocation. Tasks or ideas are assessed according to these criteria and fall into one of the following quadrants (based on the four tiles of the quadrant graphic depicted in Figure 2):

- Quick Win (high impact, low effort): These are easy tasks that have a big impact and can be quickly done to show progress and keep motivation high. Tackle these ideas first.
- Major Project (high impact, high effort): These tasks are significant and impactful but require a lot of time, money, and effort to complete successfully. Begin to work on these ideas second.
- Fill In (low impact, low effort): These are small tasks that don't have a big impact but are easy to do. Fill these tasks in where there is capacity between high impact tasks.
- Save for Later (low impact, high effort): These tasks do not have a big impact and take a lot of resources or effort. It's better to hold off on them until more important tasks are done or resources are available. These are often called “money pits.”

¹ See example of WPP Effort-Impact Analysis in Appendix A

4. TAKE ACTION

Brainstorm actions to take based on the root causes identified

Prioritize actions

Develop an implementation plan

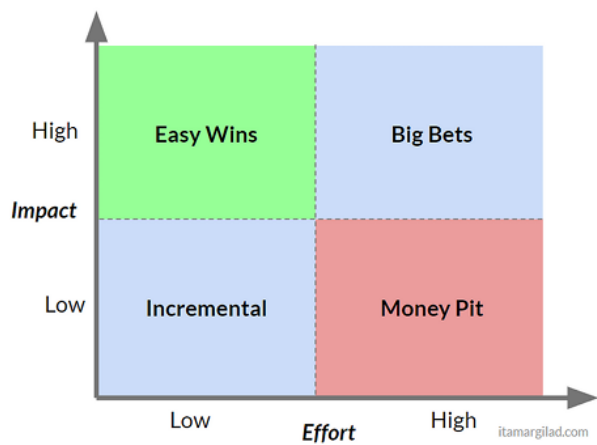


Figure 2. The Effort-Impact Matrix

Recently completed actions that support Formula Grant administration

*In progress where noted

- Issued two years of Formula Grant funds, with year three (FY2025) funding appropriated and awaiting amendments
- Increased the level of project development funding to respond to the need for increased project implementer capacity and to support the accelerated identification and development of projects.
- Drafted all [9 Guidance Chapters](#).
- Completed revisions to Chapter 3 of Guidance that streamline two provisions that relate to sole sourcing and sub-awardee procurement.
- CWIP prepared a [Guide to Phosphorus Accounting eligibility](#) that provides eligibility criteria for estimating phosphorus reductions, regulatory/non regulatory determinations, and other relevant information by project type to address common points of confusion.
- [Operations and Maintenance](#) – Clean water project adoption available as of the new 2025 fiscal year
- Completed a more simplified template for the [Site Access License Agreement](#)
- Developing guidance on strategic wood addition projects (*in progress)
- Developed a recent projects query to make it easier identify projects added to the database

Introduction to the Phase 1 Table

The following are actions that DEC has already work-planned and are underway, along with an associated timeline and reporting steps out to partners. The four primary (over-arching) themes are: theme 1 – Startup of a new complex funding program resulting in confusion in the system; theme 2 – Need for more cost-efficient project types; theme 3 – Lack of implementer capacity; theme 4 – Lack of landowner willingness to host clean water projects.

Phase 1 Action Plan: Actions Planned and/or Underway Responsive to Stakeholder Input*

Action (theme # addressed)	Stakeholder input addressed	Timeline	Next steps or planned process for soliciting stakeholder input
SFY 2025 Funding Policy Update (1)	<ul style="list-style-type: none"> • Complexity of eligibility screening • Consistency between FP and related documents • Potential for VDHP simplification • More digestible tools/decision resources • Co-funded projects 	Aiming for draft to be released for public comment by late May 2025	Adding new upfront survey for public input on requested improvements – feedback will inform priorities for updates, but not all may be feasible to address with SFY25 update. Survey timing ~ December 2024-January 2025
Cost rate methodology updates (2)	<ul style="list-style-type: none"> • Homeless project types • Project cost effectiveness/inflation • Project pipeline – id and development 	Aiming for public comment period in late spring 2025, finalized methodology published prior to SFY26 FG awards	<p>Draft methodology review and opportunity for input</p> <p>Public comment period</p>
Tracking & accounting SOPs – gullies in agricultural setting (2)	<ul style="list-style-type: none"> • Project type that doesn't have tracking & accounting 	Research to support development of tracking & accounting methods is under way – multi-phase research projects staged up	Collect examples of project opportunities to support/inform research

Action (theme # addressed)	Stakeholder input addressed	Timeline	Next steps or planned process for soliciting stakeholder input
Tracking & accounting SOPs – Forestry (2)	<ul style="list-style-type: none"> Not enough projects with p reduction 	<ul style="list-style-type: none"> Forest road erosion inventory – available Forest trail erosion inventory – under development, available spring 2025 UVA enrollment (post TMDL) revisited for add'l BMP eligibility 	<ul style="list-style-type: none"> Site-based training opportunities scheduled for May 2025 User guide
Tracking & accounting SOPs – wetlands (2)	<ul style="list-style-type: none"> Not enough projects with p reduction 	<ul style="list-style-type: none"> Research project launching winter 2025 Wetland characterization guidance and tools to calculate p reduction expected in 2027 	<ul style="list-style-type: none"> Wetland restoration P accounting in development per FFI tool
Tracking & accounting SOPs – private roads (2)	<ul style="list-style-type: none"> Not enough projects with p reduction 	<ul style="list-style-type: none"> Pilot project launching winter 2025 Methodology and tracking & accounting mechanisms anticipated in 2027 	<ul style="list-style-type: none"> Review outcomes of pilot private road assessments
Tracking & accounting SOPs – floodplain/stream (2)	<ul style="list-style-type: none"> Not enough projects with p reduction 	<ul style="list-style-type: none"> Ongoing – updates to support crediting on unmapped/unallocated segments, definitions and guidance for practice specific approaches 	<ul style="list-style-type: none"> Additional FFI trainings – winter / spring 2025
Development of new project verification checklists and updates to current (1)	<ul style="list-style-type: none"> Expand clean water adoption opportunities Additional field training and resources 	<ul style="list-style-type: none"> Lakeshore project verification checklist 2025 Stormwater updates 2025 Riparian Buffer Planting updates 2025 Rivers 2026 Forest Roads 2026 	<ul style="list-style-type: none"> Hosting field training days, request partner feedback Annually revisit/updates to current recorded trainings, host

Action (theme # addressed)	Stakeholder input addressed	Timeline	Next steps or planned process for soliciting stakeholder input
		<ul style="list-style-type: none"> Wetlands 2027 	live to engage with partner Q&A, feedback
Updates to Site Access Agreements (4)	<ul style="list-style-type: none"> Landowner engagement and willingness 	<ul style="list-style-type: none"> Updated in 2024 Annual Updates will be considered going forward 	<ul style="list-style-type: none"> Annually request partner feedback to support changes/updates via Microsoft Form
Compile Clean Water resource compendium (3)	<ul style="list-style-type: none"> Master communication/ policy resource index 	<ul style="list-style-type: none"> Summer 2025 	<ul style="list-style-type: none"> User guide Updated webpage listing resources
Develop a training series for CWSPs and project implementers (3)	<ul style="list-style-type: none"> Confusion in the system Not enough project types 	<ul style="list-style-type: none"> SWA training early 2025 Forest road/trail April and May 2025 FFI user training summer 2025 	<ul style="list-style-type: none"> WPP's EA will be leading
Improve communications externally	<ul style="list-style-type: none"> Master communication/ Need for more consistent business processes 	<ul style="list-style-type: none"> Spring-Summer 2025 	<ul style="list-style-type: none"> Draft and vet communications protocol Update and post CWAP by 05-2025
A76 Guidance updates and revisions (2)	<ul style="list-style-type: none"> Clarification of the interplay regulatory programs and formula grant opportunities for CWSP 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Revise Chapter 6 appendix for further defining what is regulatory vs. non reg.
Publicize cost efficiency thresholds (2)	<ul style="list-style-type: none"> Need for clarity on funding sources CETs can inform when projects 	<ul style="list-style-type: none"> Spring-Summer 2025 	<ul style="list-style-type: none"> Collect existing cost rate thresholds from CWSPs to publish

Action (theme # addressed)	Stakeholder input addressed	Timeline	Next steps or planned process for soliciting stakeholder input
	are directed between FG and EG		<ul style="list-style-type: none"> Discuss with FPAs how to implement thresholds through funding rounds
Support for CWSPs to enhance business process operations, such as agreement structures, payment provisions, procurement requirements, etc. where possible. Provide a forum for resource sharing (i.e., a Teams platform or somesuch) (1)	<ul style="list-style-type: none"> Confusion in the system Need for more consistent business processes 	Winter 2024/2025 <ul style="list-style-type: none"> Procurement process modified 	<ul style="list-style-type: none"> Modified procurement process options Changing advance to align with other CWF grants Open discussions around agreement structures and payment provisions.
Provide support for CWSPs to develop products, training, or shared resources- so they can support BWQC and implementers to review and develop projects in alignment with guidance and policy (3)	<ul style="list-style-type: none"> Lack of DEC capacity to answer questions Delays in getting DEC responses to questions Impacts of projects that were identified as not eligible after landowners were on board 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing CWSP monthly meetings and quarterly checkins

* Phase 1 as the actions already work-planned/underway. The outcomes of which will be tracked to report out on Clean Water Action Plan implementation and timeline.

Introduction to the Phase 2 Action Plan (Table 2)

Translating the Effort-Impact Analysis and additional gap assessment into an Action Plan

Actions for subsequent/ future workplanning between DEC and the CW Network stakeholders. These major themes (overarching theme) and potential solutions will be slated for longer-term workplanning and with stakeholder engagement. DEC will be soliciting input from the Clean Water Network on which of these themes and the related gap/ issue require a more comprehensive analysis and assessment in order to determine where to conduct a root cause analysis.

The following section provides the over-arching categories and related solutions that link the issues identified with prospective “solutions” to these issues. This list will continually evolve as these efforts are refined, as new priorities arise and are added to this list, or as efforts move to the active project list, and the items below will be reprioritized as necessary based on available capacity. DEC will (as per this draft) prioritize items in Phase I over the items noted below in order to develop Phase 2 actions over a longer period (i.e., a couple years).

Phase 2 Action Plan: Actions for subsequent/ future workplanning

Overarching Theme (#)	Gap/ issue	Potential solution and/or explore options or action	Expected gaps addressed and benefit if known
Startup of a new complex funding program resulting in confusion in the system (1)	Administrative challenges specific to FG funding model	Create systems that promote consistency across funding programs and FPAs	Facilitate opportunities for shared learning among FPAs and shared resources
Startup of a new complex funding program resulting in confusion in the system (1)	Administrative and operational challenges	Align funding program with implementer priorities	Enhance shared goals and objectives, improve communications
Need for more cost-efficient project types (2)	Operational tools Need to develop more P SOPs across new high p efficiency project types	Continued advancement of clean water project opportunities	Develop some tools for support partners with non-RAP farm practices. Build support for more practice standards and O&M

Overarching Theme (#)	Gap/ issue	Potential solution and/or explore options or action	Expected gaps addressed and benefit if known
Consider alternative pathways for projects to access FG funding where P accounting is not available (2)	Limited flexibility to develop and design projects without adopted SOPs - Need to develop more P SOPs across new high p efficiency project types	Expand on project development and advancement opportunities	Allow for flexibility for CWSPs and project implementers to develop, design and implement projects without adopted SOPs if there is a basis to support projects being highly cost efficient, but where P crediting hasn't been fully determined
Lack of project implementer capacity (3)	Business process operations could be shared across CWSPs and other FPAs	Promote greater bench strength and consistency across CWSPs and other FPAs	Promote CWSP-FPA coordination across funding pools (i.e., vetting projects per FG and EG)
Lack of Landowner willingness to host projects (4)	Limited policy guidance to allow for CWSPs to compensate landowners for the value of land used to host clean water projects or set up pay for performance systems	Explore policy options to increase landowner adoption of clean water projects.	This has the potential to significantly increase landowner willingness to host clean water projects although it would be helpful to understand models that would have the biggest impact.
Explore potential for CWSPs to fund River Corridor Easements (2) and related restoration work	<ul style="list-style-type: none"> • Not enough projects with p reduction • Lack of DEC capacity 	Requires some determination of the potential # of prospective RCE projects	Expand project type opportunities
Develop system wide communications to increase public understanding of the	Expand the landowner "buy-in" associated with	Expand on the "marketing" and culture of clean water work	Enhance the culture of clean water benefits and the opportunities

Overarching Theme (#)	Gap/ issue	Potential solution and/or explore options or action	Expected gaps addressed and benefit if known
benefits of hosting clean water projects (4)	hosting CW projects		

Action Plan implementation – next steps

Purpose: Establish high-level goals and related expectations for mutually agreed process between DEC, CWSPs, and project implementers, the outcomes of which would be to continue to implement process improvement actions that lead to greater programmatic operational efficiency. The following are some of the anticipated outcomes associated with ongoing coordination efforts towards Clean Water Action Plan implementation:

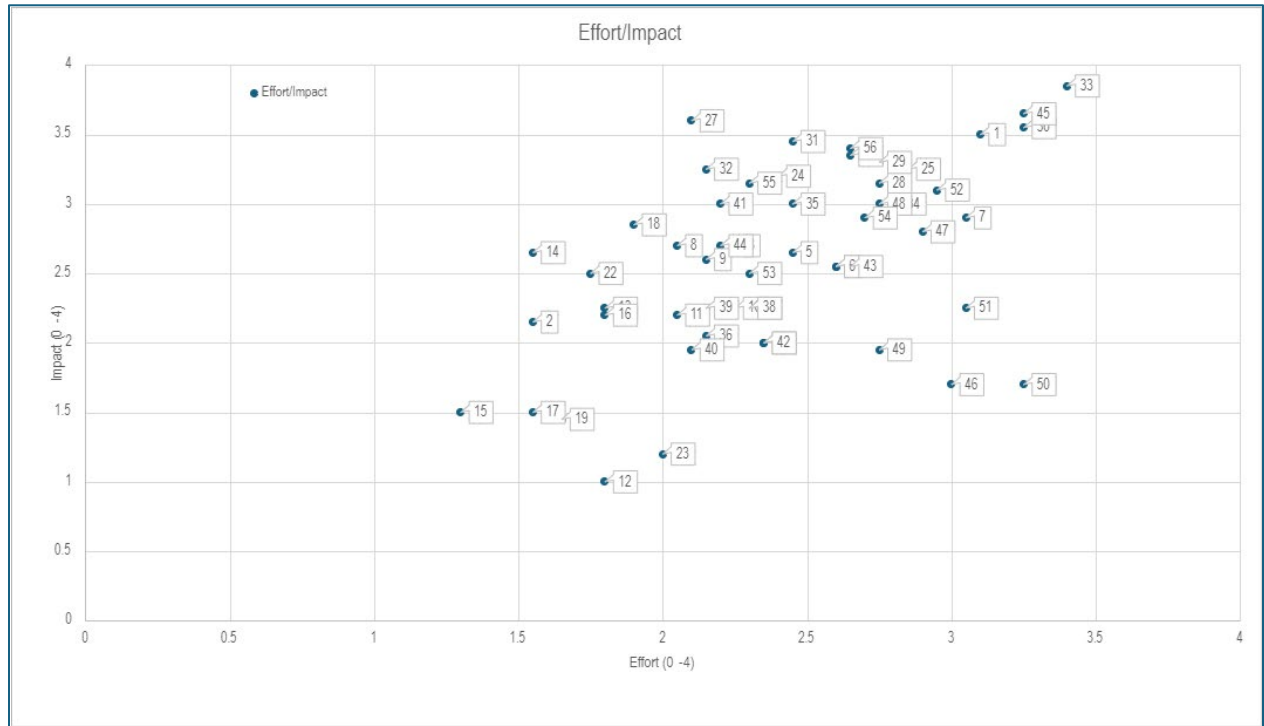
1. Foster partner relationship building strategies, including DEC
2. Develop more accurate policy/accounting interpretations and WQ benefits
3. Increase programmatic capacity for all partners (PIs, CWSP/FPAs, DEC)
4. Foster healthy team dynamic between partners respecting each other's time, competing priorities/workload, expertise, and roles and responsibilities (esp. within BWQCs)
5. Improve internal and external transparency accessible to all colleagues and partners

This action plan is intended to be a living document, and actions will be added or moved based on updated priorities, and as specific efforts develop or evolve over time. DEC will reconvene the Act 76 workgroup during winter/spring 2025 to solicit input on the CW Action Plan and will update the plan in 2025 based on this input and revisit the priorities that may have been addressed (per Phase 1) in order to reflect progress on actions and/ or may have been completed.

DEC will update the Action Plan on an annual basis to keep the network informed of efforts as progress is being made or changes over time. Partners are encouraged to provide feedback on the plan on an ad hoc basis. DEC will continue to seek specific input on phase 1 actions annually as part of an Act 76 external workgroup meeting(s), a Clean Water Summit (when convened again in the future, perhaps once every 2 years), targeted stakeholder engagement, a survey, or some combination thereof. DEC will complete an effort impact assessment in coordination with stakeholders to help prioritize actions in future iterations of the Clean Water Network Action Plan. DEC will seek input on how to improve coordination on these efforts and in the development and implementation of this workplan.

Appendix A. Example of the Effort-Impact scoring grid

The DEC-WPP Team conducted a preliminary Effort-Impact assessment with the feedback generated from the 3 Clean Water feedback sessions in 2024. The team used this example of how the E-I scores could be used to inform which actions may have a high impact value relative to the effort invested.



Note that this example is intended as a demonstration of how the feedback could be analyzed to derive an empirically driven assessment of feedback/ input that has been compiled.