

Business Operations and Support Services Program		
Division Goal		
1. Protect Vermont's most pristine or special waters		
	Objective # 1	Strategies
	Identify most pristine or special waters for protection	Assist with GIS work and wetland mapping projects
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
	Objective # 1	Strategies
	Timely and efficient permit application administrative processes	Evaluate application review processes and make changes to 'lean' processes and procedures (advocate for legislative changes as needed)
		Back-up/cross-training of staff to keep permits processing when a staff member is out or volume is high
		Better utilize technology through SSRS reporting services to automate permit issuance
	Objective # 2	Strategies
	Increased administratively complete applications received	Create clearer and more user friendly permit application materials by converting applications into standard fillable PDFs
		Develop nForms for permit applications
		Create webinars and/or guidance materials to assist in understanding of permit application forms and requirements
	Objective # 3	Strategies
	Standardize public noticing of permits/applications	Evaluate/Lean public noticing of permits/applications (advocate for legislative changes as needed)
	Objective # 4	Strategies
	Prompt and efficient review of administrative permit compliance requirements	Evaluate compliance review process and make changes to 'lean' processes and procedures

		Back-up/cross-training of staff to keep permits processing when a staff member is out or volume is high
		Develop and implement nForms to allow permittees to submit permit compliance information electronically to us
	Objective # 5	Strategies
	Increased permittee awareness of upcoming and past due permit requirements	Develop automated monthly reports for upcoming permits to expire, reporting deadlines, and past due requirements
	Objective # 6	Strategies
	Eliminate past due permittee outstanding accounts	Create reports to pull current and past due accounts efficiently to make collecting on past due accounts easier
	Objective # 7	Strategies
	Increased efficiencies in permit accounting processes	Evaluate invoicing and accounts receivable processes and make changes to 'lean' processes and procedures (advocate for legislative changes and technology improvements as needed)
	Objective # 8	Strategies
	Increase permit information directly available to the public	Work with vendor to meet EPA eRule on information flowing from SW and WW databases to ICIS and ECHO
		Receive permit records electronically and make available to the public directly through our website
		Scan paper permit records and make available to the public directly through our website
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
	Objective	Strategies
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<p>4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation or remediation plans for Vermont's degraded waters using a combination of regulatory and non-regulatory tools</p>		
	<p>Objective # 1</p>	<p>Strategies</p>
	<p>Timely permit administrative review of increased permit applications received as related to LCTMDL and Act 64</p>	<p>Evaluate application review processes and make changes to 'lean' processes and procedures (advocate for legislative changes as needed)</p>
		<p>Back-up/cross-training of staff to keep permits processing when a staff member is out or volume is high</p>
		<p>Formalize roles and responsibilities of program staff to maximize efficiency in the implementation of TMDL and increased permit issuance</p>
	<p>Objective # 2</p>	<p>Strategies</p>
	<p>Track permits in Impaired waters</p>	<p>Develop database reporting tools to pull information relating permits and the waters they are associated with</p>

Vermont Clean Water Initiative Program		
Division Goal		
1. Protect Vermont's most pristine or special waters	-----	-----
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters	-----	-----
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition	-----	-----
4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation of remedial plans for Vermont's degraded waters using a combination of both regulatory and non-regulatory tools		
	Objective # 1	Strategies
	Coordinate implementation of clean water activities, including priorities described in tactical basin plans, Act 64, Lake Champlain TMDL and Phase 1 Implementation Plan and other TMDLs	
		Promote an implementation framework that identifies, prioritizes, targets, implements, measures, tracks and communicates clean water actions, consistently across all pollution source sectors
		Coordinate implementation of priority projects identified in tactical basin plans

		Support delivery of technical and educational assistance to maximize success of local, state and federal partners in identification, prioritization and implementation of water quality projects
		Provide assistance to AAFM on agricultural water quality program development and implementation of Act 64 and TMDLs
		Maximize the achievement of important co-benefits in water quality investments
		Manage the programmatic aspects of the ECO AmeriCorps program
	Objective # 2	Strategies
	Provide for long term, sustainable funding to support implementation	
		Use water quality grant and loan funding programs to finance priority restoration actions, using state funds to leverage federal, local and private funds where possible; identify and secure additional funds, including grants funds to support implementation
		Work closely with LCBP to maximize coordination and efficiencies in funding implementation
		Provide support to address agricultural runoff controls through the RCPP grant program
		Provide management assistance to Clean Water Fund Board
	Objective # 3	Strategies
	Track activities for measuring progress	
		Develop and use a comprehensive tracking and accounting system to support Clean Water Fund, and the accountability framework in the Lake Champlain TMDL; develop tracking database to track statewide clean water restoration activities
		Establish and coordinate with Agency and/or interagency working groups in the development and use of tracking and accounting systems
		Develop procedures for populating tracking database utilizing existing reporting requirements and channels of data/information
		Establish and apply a standard methodology to clean water restoration activities captured in tracking database to account for the financial, programmatic, environmental and social outcomes associated with those activities
	Objective # 4	Strategies
	Report and communicate on State's progress in achieving and maintaining clean water	

		Prepare reports to various audiences about State's progress
		Develop a reporting framework based on the tracking database to meet reporting requirements
		Maximize coordination and communication among all state agencies involved in implementation
		Coordinate communications, such as the use of media releases, progress reports, websites, blogs, fact sheets and an annual Clean Water Implementation Program Report Card
		Maximize public engagement in project and TMDL implementation process
		Work with state agencies to use a new brand and marketing strategy to support Clean Water Initiative
		Use workshops, webinars, and other public events to engage partners and stakeholders

Lakes and Ponds Program		
Division Goal		
1. Protect Vermont's most pristine or special waters		
	Objective # 1	Strategies
	Identify lakes for potential designation as Outstanding Resources Waters	Establish a protocol for identifying lakes as Outstanding Resource Waters, consistent with V.S.A. 10 § 1424a.
		Engage the public in the process of proposing and securing ORW status for appropriate lakes.
		Two monitoring team members attend 2016 National Monitoring Conference to research state-of-the-art approaches.
		Assess current monitoring program to ensure identification of and ongoing monitoring of ORW.
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
	Objective # 1	Strategies
	Digest and disseminate data collected on our inland lakes in recent years to use in determining how we will measure compliance with the Water Quality Standards, Shoreland Protection Act, the Division's Goal #1, and priority setting within the program.	Process and analyze backlogged data from Spring P, Next Generation Lake Assessments and reservoir studies
		Update Lakes Score Card; Integrate updated Lake Score Card and long term data into new data portal (IWIS)
		Review littoral habitat assessment protocols with shoreland management assessment in mind
		Participate in finalizing Water Quality Standards amendments
		Consider all lake monitoring through the lens of new Water Quality Standards
		Monitor 13 sentinel lakes for climate change

	Objective # 2	Strategies
	Inventory, evaluate and enhance Program's attainment of its mandated obligations	Conduct inventory of federal, regional and state mandated obligations; create list of funding sources, all assessment and monitoring programs, reporting obligations, etc.
		Evaluate inventory of obligations; identify gaps; create staff workplans linked to mandated obligations
		Identify metrics/measurements for achievement of mandatory obligations
	Objective # 3	Strategies
	Enhance achievement of obligations through databases established/modified; lean events	
	Objective # 4	Strategies
	Preserve the natural lakeshore to protect and improve water quality, habitat and lake ecosystem functions	Conduct Shoreland Permit Program, Lake Encroachment Permit Program; Participate in Act 250 and Section 248 proceedings
		Develop processes to promote partnerships to conserve prioritized undeveloped shoreland; work to ensure lakeshore BMPs used in state and federally funded projects and State Parks and F&W access areas; work with Agency Landds Team to identify priority shoreland use and habitat areas for improved management and protection of natural conditions
		Develop, promote and teach shoreland BMPs
	Objective # 5	Strategies
	Monitor and assess lakes and ponds to report on current and long term water quality and habitat conditions, inform and engage public, and guide lake management policy decisions with relevant science.	Through the Lay Monitoring Program, collect weekly water quality samples and user survey data during June, July and August on 50 - 100 lakes, including TMDL lakes

		Obtain weekly nutrient enrichment and chloride samples from the core Lake monitoring sites from ice out to ice in; monitor aquatic plant species in lakes including rare, threatened and endangered species; Monitor tributary nutrient and chloride contributions within Lake Champlain Watershed; continue annual, core, long-term monitoring programs for inland lakes greater than 10 acres including Very High Quality Waters, Spring P monitoring and Summer Lake Assessment
		Develop and implement monitoring strategies to address immediate and emerging lake monitoring needs and threats (e.g. drawdown impacts, lakeshore development, climate change, AIS and nutrient criteria exceedances).
		Develop Lakes Biocriteria
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
	Objective # 1	Strategies
	Empower lake leaders to participate in monitoring and managing their lakes; building capacity so citizens can take direct action to help lakes	Train shoreland property owners as Lake Leaders and natural resource professionals as Lake Wise Evaluators to promote lake friendly shoreland management and assess property for Lake Wise certification
		Develop and implement voluntary shoreland management workshops for contractors
		Through the Lay Monitoring Program, collect weekly water quality samples and user survey data during June, July, August on 50-100 Lakes, including lakes with TMDLs
		Communicate spread prevention message through Greeter Programs, Access Area signs, protocols and outreach materials
		Maintain citizen monitoring for new AIS infestations through VIP Program and the development of AIS identification materials for priority audiences
		Develop outreach materials on aquatic invasive species management options

<p>4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation or remediation plans for Vermont's degraded waters using a combination of regulatory and non-regulatory tools</p>		
	<p>Objective # 1</p>	<p>Strategies</p>
	<p>Better integrate Program's priorities into tactical basin planning process</p>	<p>Identify priorities for lakes (statewide, basin-wide, lake specific)</p>
		<p>Craft priority-specific implementation table tasks utilizing appropriate scale; share priorities in basin planning process</p>
		<p>Identify other outlets to communicate strategies and priorities</p>
		<p>Identify data for use in priority development</p>
	<p>Objective # 2</p>	<p>Strategies</p>
	<p>Reduce and prevent the impacts of aquatic invasive and nuisance species to protect and improve water quality, aquatic and terrestrial wildlife habitat and lake ecosystem functions</p>	<p>Communicate spread prevention message through Greeter Programs, Access Area signs, protocols and outreach materials</p>
		<p>Support enforcement of aquatic invasive species transport law;; enhance rapid response permit with DEC & F&W</p>
		<p>Detect new AIS infestations through VIP Program, staff led surveys and distribution of AIS identification materials for priority audiences</p>
		<p>Control and manage AIS populations</p>
		<p>Promote knowledge and value of native aquatic species through outreach materials and workshops</p>
		<p>Conduct zebra mussel monitoring and Cyanobacteria monitoring on Lake Champlain and inland lakes</p>

Monitoring, Assessment and Planning Program		
Division Goal		
1. Protect Vermont's most pristine or special waters		
	Objective #1	Strategies
	Conduct rulemaking to protect Vermont's most pristine or special waters	Conduct rulemaking to reclassify surface waters in USFS lands to A(1)
		Conduct public rulemaking to designate two surface waters as Outstanding Resource Waters
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
	Objective # 1	Strategies
	Update Water Quality Standards	Develop a use-based classification structure for WQS
		Complete public rulemaking to update WQS; seek accompanying statutory changes in Legislature
		Update Vermont's Anti-degradation Implementation Procedure in light of WQS changes
	Objective # 2	Strategies
	Enhance public access to water quality data	Develop web-enabled, publicly available water quality data summaries and pollution source assessments
	Objective # 3	Strategies
	Continue to conduct primary and ongoing priority monitoring efforts	Complete chemical and taxonomic analysis for 2015 field samples during 2016.
	Objective # 4	Strategies

	Continue to conduct primary and ongoing priority assessment efforts	Produce 2016 Integrated Assessment Report and List of Priority Waters implement assessment and listing approach for chlorides in affected streams
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
	Objective # 1	Strategies
	Enhance high quality waters through criteria, assessment and listing	Utilize new WQS nutrient criteria in reasonable potential analyses for NPDES permits Develop and implement assessment and listing approach for chlorides in affected streams
4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation of remedial plans for Vermont's degraded waters using a combination of both regulatory and non-regulatory tools		
	Objective # 1	Strategies
	Continue to conduct primary and ongoing priority planning activities	Identify Very High Quality Waters for three basins in 2016
	Objective # 2	Strategies
	Develop TMDLs and promote implementation plans	Develop Lake Memphremagog TMDL Revise tactical basin planning process to implement efficiencies and business process improvements identified in Lean events Formalize roles and responsibilities of program staff to maximize efficiency in the implementation of restoration efforts, including implementation of the Lake Champlain TMDL Participate in EPA 303d Vision by maintaining WQ Measures 27 and 28 information

		Continue to promote primary and ongoing TMDL priorities
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	A	B	C
1	Rivers Program		
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3	Division Goal		
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5	1. Protect Vermont's most pristine or special waters		
6		Objective # 1	Strategies
7		Protect open river corridors and floodplains in perpetuity	Annually increase the number of land conservation (easements and fee simple) and buyouts in river corridor and floodplain protection and restoration; i.e. securing river corridor, channel management and riparian buffer provisions in land conservation projects
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9		Objective # 2	Strategies
10		Protect existing and natural river flows by avoiding new dams and flow diversions	Define flow protection requirements and advise new project proponents so that only those projects that can fully meet WQ standards move forward.
11			
12		Objective # 3	Strategies
13		Protect existing open river corridors and floodplains through regulation	Provide technical assistance to an increasing number of communities each year to protect floodplains and river corridors through municipal development reviews
14			Define floodways to include Flood Hazard Areas and State-mapped River Corridors and recommend protection to the No Adverse Impact Standard.
15			
16		Objective # 4	Strategies
17		Provide river corridor and floodplain management training	Establish a regional certified floodplain technician program
18			Implement a training program for RPC staff and other planners to establish greater statewide capacity for assisting municipalities with river corridor planning and protection
19			
20		Objective # 4	Strategies
21		Provide river science and river corridor protection presentations, workshops and webinars; provide rivers and roads training	Conduct outreach and train municipalities and contractors in the use of the SRMPP and authorizations under new stream alteration rules and general permit.

	A	B	C
22			Develop a 3 tiered outreach and training program by offering courses to VTrans Operations Technicians, municipal roads workers, contractors and other river technicians
23			Attend public meetings and workshops to educate the public and other agencies on the science and policy of river, river, corridor, floodplain, and flow protection
24			
25		Objective # 5	Strategies
26		Develop and maintain the FloodReady web page and the Flood Resilient Communities Program	Enhance the Flood Ready webpage to promote cross agency flood resilience planning and implementation tools to increase municipal adoption of enhanced floodplain, river corridor and riparian buffer protection bylaws and mitigation measures
27			Enhance the Flood Resilient Community Program with funding and tech assistance incentives for municipalities to adopt regulations for floodplains, river corridors and riparian buffers.
28			
29		Objective # 6	Strategies
30		Enhance local, state and federal protections of existing fluvial processes and channel morphology toward dynamic equilibrium conditions	Complete an audit and modification of state and federal agency funding and technical assistance programs to ensure that the state is not underwriting developments in river corridors and floodplains
31			Secure adoption of enhanced model floodplain and river corridor protection bylaws that exceed the NFIP minimum requirements from the current 20% to 35% of all Vermont municipalities
32			
33			
34	2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
35		Objective # 1	Strategies
36		Maintain river corridors and floodplains through municipal and Act 250 regulation	Review all development proposals under municipal and Act 250 jurisdiction within river corridors and floodplains and limit further encroachments / fills to meet No Adverse Impact Standard
37			
38		Objective # 2	Strategies
39		Maintain river corridors and floodplains through state regulation	Further develop and refine implementation of state floodplain rule and protection procedures

	A	B	C
40			Increase program's capacity from 3 - 5 fully-trained floodplain managers to regulate municipally exempt activities and Act 250 developments and advise municipally regulated development
41			Establish MOUs with VTrans and AAFM to regulate developments within their purview to be consistent with state floodplain rule
42			Implement general permits
43			Develop and implement both field and web-based project authorization capacity and data management systems
44			
45		Objective # 3	Strategies
46		Conduct stream geomorphic assessments and river corridor planning and enhance the accessibility of data, maps, and projects	Obtain LiDar data to modernize inundation and river corridor mapping statewide for rivers and streams
47			Conduct Phase 1 and Phase 2 stream geomorphic assessments and bridge/culvert assessments and use data to complete river corridor plans
48			Maintain Dam Inventory
49			Integrate Phase 2 field assessment data, river corridor protection and restoration project information and statement wide river corridor and mapping data to support municipal resiliency plans, road erosion assessments, tactical basin plans and project identification within state, regional, and local hazard mitigation plans.
50			
51		Objective # 4	Strategies
52		Provide NFIP technical assistance and Community Assistance Visits	Assist municipalities with administration of the National Flood Insurance Program and ensure compliance with municipa regulatory obligations under the NFIP by conducting audits.
53			
54		Objective # 5	Strategies
55		Maintain stream geomorphic processes and equilibrium conditions through regulation and technical assistance	Promote bed and bank stabilization, bridge and culvert repair, woody debris removal at crossings and maintenance of channel conveyance consistent with the Standard River Management Principles and Practices
56			Continually update the Standard River Management Principles and Practices
57			Achieve FEMA recognition of state adopted river management and stream crossing codes and standards for conducting emergency protective measures
58			Promote municipal adoption of codes and standards
59			Increase program's capacity to provide technical and regulatory assistance for stream alterations

	A	B	C
60			Develop and implement both field and web-based project authorization capacity and data management systems
61			Establish a River Operations Center within ANR and State Incident Command Systems prepared to manage and authorize emergency measures
62			Work with AAFM and NRCS to establish streambank stabilization practices consistent with ANR polices as per Act 65 revisions to 10 V.S.A. 1021
63			
64		Objective # 6	Strategies
65		Maintain flows at existing hydropower and snowmaking projects	Increase program staffing to deal with large number of hydro licenses and snowmaking approvals up for renewal
66			Begin relicensing of hydropower facilities and snowmaking withdrawals up for renewal
67			Update DEC's 1993 Flow Procedure to reflect the science and experience of protecting instream flows and aquatic habitats over past 20 years
68			
69		Objective # 7	Strategies
70		Inspection of hydropower operations and water withdrawals	Increase compliance inspections and studies at both licensed and unlicensed hydropower facilities to enforce existing 401 conditions and achieve compliance with Water Quality Standards
71			Establish 10 V.S.A. 1003 review process rule
72			Create an internship to inventory withdrawals and diversions
73			
74			
75	3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
76		Objective # 1	Strategies
77		Enhance riparian, river corridor and floodplain function	Assist in the design and implementation of an increasing number of projects that relocate or reduce the footprint of structural encroachments and fills within river corridors and floodplains
78			Provide technical assistance to watershed groups and conservation districts to enhance the planting riparian buffers by using available stream geomorphic data and river corridor plans
79			
80		Objective # 2	Strategies

	A	B	C
81		Enhance habitat features as part of instream river management and flow and reservoir management	Take every opportunity to incorporate habitat enhancing features in river management projects consistent with the River Management Principles and Practices, including culvert jump pools with rock weirs, culvert sills to maintain natural stream bottoms and bed and bank revetments with fish habitat
82			When existing hydropower facilities are being relicensed use the state 401 certification process to ensure that facilities for fish passage will be constructed
83			When existing hydropower facilities are being relicensed use the state 401 certification process to enhance downstream flows and water level management to meet the water quality standards
84			
85		Objective # 3	Strategies
86		Enhance recreational amenities at hydropower projects	Ensure that hydropower certifications include developed portages and other public access amenities
87			
88	4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation of remedial plans for Vermont's degraded waters using a combination of both regulatory and non-regulatory tools		
89		Objective # 1	Strategies
90		Restore floodplains	Actively pursue the design and implementation of projects that restore floodplains by raising stream beds, creating floodplain cuts, or removing berms and levees
91			Actively pursue the design and implementation of projects that completely remove structural encroachments and fills within rivers, river corridors and floodplains, including the removal of buildings, berms, derelict dams or stream crossings, and the replacement of culverts with bridges
92			Target federal and state capital funding to priority restoration areas identified in tactical basin planning
93			

	A	B	C
94		Objective # 2	Strategies
95		Restore streams and rivers from a geomorphically unstable condition to an equilibrium condition	Ensure the replacement of undersized culverts and bridges meet both the equilibrium and connectivity performance standards in the GP
96			Assist in the implementation of stream restoration projects using natural channel design techniques to ensure vertical stream stability and floodplain function
97			
98		Objective # 3	Strategies
99		Restore river reservoir habitats	Restore flows from peaking to run-of-river operations
100			Stabilize reservoir levels
101			
102		Objective # 4	Strategies
103		Target federal and state capital funding to priority restoration areas identified in tactical basin planning	Work to link high priority projects to available federal and state funding

Stormwater Program		
Division Goal		
1. Protect Vermont's most pristine or special waters		
	Objectives -----	Strategies -----
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
	Objective # 1	Strategies
	Manage runoff from new/redeveloped impervious surfaces	Implement GP 309015, 3-9010; individual permits
	Objective # 2	Strategies
	Manage runoff from construction sites	Implement CGP 3-9020; individual permits
	Objective # 3	Strategies
	Manage runoff from industrial facilities	Implement MSGP
Objective # 4	Strategies	
Manage runoff from municipal storm sewers	Implement MS4 GP	
Objective # 5	Strategies	
Manage runoff from municipal highways	Issue MRGP (Municipal Roads General Permit)	
Objective # 6	Strategies	
Manage runoff from state highways	Issue TS4 GP	
Objective # 7	Strategies	
Manage runoff from CAFOs	Implement CAFO GP per NPDES delegation and MOU with AAFM	
Objective # 8	Strategies	
Inspect regulated facilities	Inspect per Compliance Monitoring Strategy	

	Objective # 9	Strategies
	Enforce permit violations	Update Program Compliance Policy,
	Objective # 10	
	Implement protective technical standards	Revise Vermont Stormwater Management Manual
	Objective # 11	
	Implement protective technical standards	Review EPSC Manuals
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
	Objective # 1	Strategies
	Address municipal road runoff in unimpaired watersheds	Develop and issue "MRGP (Municipal Roads General Permit)
	Objective # 2	Strategies
	Address state highway runoff in unimpaired watersheds	Develop and issue TS4
4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation of remedial plans for Vermont's degraded waters using a combination of both regulatory and non-regulatory tools		
	Objective # 1	Strategies
	Address runoff from existing developed land in unimpaired watersheds	Develop and issue Developed Lands GP
	Objective # 2	Strategies
	Address stormwater contribution to Lake Champlain	Implement via MS4, TS4, Municipal Roads GP, Developed Lands GP
	Address stormwater contribution to stormwater-impaired waters	Implement via MS4, TS4, Municipal Roads GP, Developed Lands GP

Wastewater Program		
Division Goal		
1. Protect Vermont's most pristine or special waters	-----	-----
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
	Objective # 1	Strategies
	Meet P&C List of Commitments	P&C List requirements will be implemented over the next five years as NPDES permits are reissued. Most list requirements address issues that need to be incorporated and implemented through permits.
		Strategies
	Objective # 2	
	Meet EPA's Permit Priority List requirements for issuance of NPDES permits	The wastewater program has identified 45 permits for reissuance each year over the next five years. Permits will be issued in the year following adoption of the relevant Tactical Basin Plan the receiving water. The Program further identifies to EPA approximately 15 permits each year that it commits to issuing, which are drawn from each year's pool of 45 permits.
	Objective # 2	Strategies
	Satisfy EPA's Compliance Monitoring Strategy Requirements by providing compliance oversight and assistance to municipal and industrial WWTFs	Use EPA's Inspection Targetting Model to rate each municipal and industrial WWTF without regard to major/minor status; Develop alternative compliance monitoring strategy based on this risk-assessment in order to satisfy EPA in light of staff limitations
	Objective # 3	Strategies

	Conduct process design reviews to help insure that WWTFs and pretreatment facilities comply with permit limits and provide adequate redundancy and reliability	Design reviews for facility upgrades and for the applicability of pretreatment permit requirements for new industrial discharges to municipal collection systems will be conducted as they arise and as expediently as possible.
	Objective # 4	Strategies
	Decrease the time spent on issuing new NPDES pretreatment permits	Applications for new pretreatment permits will be prioritized, as they involve businesses that are eager to commence operations and represent opportunities for additional employment and tax revenues in the state.
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
	Objective # 1	Strategies
	Assist NPDES permittees in accomplishing voluntary facility upgrades or optimization	Continue to work with FED, municipalities, and their consulting engineers in the review of effluent characteristics in relation to the requirements of any TMDL under which they must operate. Evaluations to include general facility condition and needs for process optimization for nutrient removal.
	Objective # 2	Strategies
	Promote the control or elimination to the greatest extent possible of the number of CSO outfalls and CSO events	Continue efforts to adopt the 2015 revisions to the CSO Control Policy as a new rule. Provide technical assistance to municipalities in evaluating the condition of collection system and determining what work must be done to minimize or eliminate their capture stormwater, work with FED to secure project funding, and evaluate the potential for physical elimination of as many outfalls as possible where such an action would not exacerbate releases from other points.

<p>4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation of remedial plans for Vermont's degraded waters using a combination of both regulatory and non-regulatory tools</p>		
	<p>Objective # 1</p>	<p>Strategies</p>
	<p>Through NPDES permits and compliance oversight and assistance, implement the wastewater related requirements of the Long Island Sound, Lake Champlain and other TMDLs</p>	<p>Reissue NPDES permits in concert with tactical basin planning process rotation so that permit conditions are based on most recent available data</p>
		<p>Target inspections on facilities that are most in need of an inspection or technical outreach. Focus on need, rather than absolute numbers conducted.</p>
		<p>Formalize roles and responsibilities of program staff to maximize efficiency in the implementation of TMDL</p>

Wetlands Program		
Division Goal		
1. Protect Vermont's most pristine or special waters		
	Objective # 1	Strategies
	Designate Class I Wetlands for the highest level of protection.	Finalize the procedure for evaluating wetlands for classification to Class I
		Identify those wetlands with Class I potential in Basin plans for further research
		Submit 5 wetlands for reclassification
2. Improve and expand the ongoing maintenance of Vermont's existing high quality waters		
	Objective # 1	Strategies
	Implement permitting for the protection of wetland function and values	Further develop and refine implementation of state wetland rule and protection procedures
		Create procedures for defining a "minimal impact", reviewing "cumulative impacts", practicable site avoidance, practicable function avoidance, practicable minimization of impacts, and compensation thresholds.
		Create and implement general permits. GP for solar, stormwater retrofits, agricultural BMPs, septic replacements.
		Develop and implement both field and web-based project authorization capacity and data management systems
		Properly adjust staffing on this task as development pressures change
	Objective # 2	Strategies
	Ensure permit compliance	Develop data management system and standard letters
	Objective # 3	Strategies

	Improve wetland identification for project planning by enhancing wetland mapping	Develop standard protocol for receiving shapefiles of delineated wetlands
		Coordinate with Vtrans and Fish and Wildlife to obtain additional wetland shapefiles.
		Explore funding and modeling opportunities for statewide mapping improvements
	Objective # 4	Strategies
	Successfully compensate for wetland function and value loss	Work with EPA and ACOE to implement, monitor and improve In Lieu fee program.
	Objective # 5	Strategies
	Continue to conduct monitoring efforts	Collaborate with MAPP and Lakes to realize efficiency.
		Obtain additional grants for monitoring
3. Increase opportunities for the enhancement of existing high quality waters to an improved condition		
	Objective # 1	Strategies
	Implement non-native and nuisance plant control plan review	Create standard plans for conservation groups which regularly control invasive plants.
		Coordinate outreach efforts with Lakes program, Forest and Parks and Fish and Wildlife.
		Create standard review procedure.
4. Aggressively pursue restoration of currently impaired waters through the development and timely implementation of comprehensive TMDLs, and implementation of remedial plans for Vermont's degraded waters using a combination of both regulatory and non-regulatory tools		
	Objective # 1	Strategies

	Implement wetland restoration plan review	Create standard review procedure.
		Properly staff program.
	Objective # 2	Strategies
	Coordinate Statewide restoration efforts with partners	Train staff in restoration techniques
		Identify restoration opportunities using the 2008 restoration report as a framework and coordinating with Basin planners