

# Narratives

## Executive Summary

The Vermont Department of Environmental Conservation (VTDEC) proposes to place 15 full-time and 10 half-time AmeriCorps members (20 MSY) with municipalities and non-profit organizations throughout the state of Vermont to implement strategies to protect and improve water quality in the Lake Champlain watershed, an important water resource that is currently impaired by excess phosphorus. Specifically, AmeriCorps members will assist in providing general education and outreach to community members on water quality issues and solutions, implementing watershed restoration projects such as buffer plantings and floodplain reconnections, and making tangible improvements to public lands through the utilization of best management practices for stormwater management. Through this direct service, AmeriCorps members will gain the skills and experience needed to be competitive in the state's growing green jobs field.

Furthermore, the AmeriCorps members will leverage an additional 100 community members who will be engaged in outreach, education, and implementation strategies in their communities.

This program fits in with the CNCS priority of Governor/Mayor Initiative with a focus area of Environmental Stewardship.

The CNCS investment of \$263,384 will be matched with \$217,130, (\$104,630 in state funds and \$112,500 in local funds).

## Rationale and Approach/Program Design

### B. Program Design (50 percent)

#### 1. Problem/Need (9 points)

Lake Champlain, the nation's 6th largest naturally formed lake, is an important resource for Vermont and the northeast region. The Lake is a major economic driver for tourism and recreation, provides drinking water for over one-third of Vermont's entire population, and provides critical habitat for numerous aquatic organisms. Unfortunately, under the Federal Clean Water Act, Lake Champlain is considered "impaired" by phosphorus pollution, resulting, among other things, in toxic algal blooms that harm animals and people, as well as compromise recreational uses, tourism, and economic development.

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In an effort to address this issue, the US Environmental Protection Agency and the State of Vermont have been working together to develop a Total Maximum Daily Load (TMDL) limit on phosphorous entering Lake Champlain. This TMDL will require significant investments in water quality over the next 25 years. It will also require a number of innovative strategies, many of which are spelled out in the recently released Vermont Clean Water Initiative report. These strategies include: (1) increasing the capacity of state and local partners to meet clean water goals; (2) updating accepted farming and logging practices; (3) improving stormwater runoff management in parking lots and roads; and (4) restoring and protecting river corridors, floodplains, wetlands, and forest cover.

Implementing the above strategies is an enormous task. The Lake Champlain watershed is roughly half the land area of Vermont and phosphorus loads are generated across nearly all land uses including agricultural, residential, commercial, and forested. Recent estimates suggest that cleaning up Lake Champlain will cost in excess of \$155 million dollars over the next decade. Our ultimate success will be dependent on the strength of our partnerships, the knowledge of our citizens, the skill of our workforce, the resources brought to bear, and the tangible improvements made to the landscape.

This proposal seeks to strategically utilize AmeriCorps members to help priority communities take the necessary actions identified in the above mentioned plan. VTDEC will work in partnership with state agencies (Agency of Natural Resources, specifically the Department of Forests, Parks, and Recreation, and the Agency of Agriculture, Food and Markets), nonprofit partners (Watersheds United Vermont and Vermont Association of Conservation Districts), the Governor's Office, and Mayor's throughout Vermont to provide meaningful service opportunities that further the goals of the State in restoring Lake Champlain and lead to successful experiences for our AmeriCorps members.

Utilizing AmeriCorps members at this critical time will provide a much needed boost to our water quality improvement efforts and is a perfect fit with our state's priorities. This program becomes particularly valuable when considering the growth of the green job sector and the need to prepare the workforce adequately for not only Vermont but the pressing water quality problems facing the nation. The skills gained by AmeriCorps members will be an invaluable asset as we work as a state, and a nation, to mitigate our environmental impacts today and into the future.

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### 2. Theory of Change and Logic Model (17 points)

The long-term outcome of ECO Vermont is to improve water quality in Vermont, specifically in and around the Lake Champlain watershed. Vermont's 2014 Draft Priority Waters List identifies at least 372 surface waters as impaired, altered or stressed. Nonpoint source pollution, including surface water run-off, is a major cause of this condition.

Restoring these waters and their designated uses is a high priority for the State and will require a combination of mandatory and voluntary actions. A number of these actions are identified in the Lake Champlain Phase I Total Maximum Daily Load (TMDL) Implementation Plan (attached) and watershed-specific Tactical Basin Plans published by the Watershed Management Division of the State of Vermont. Three main actions include addressing nutrient export from agricultural operations, mitigating stormwater runoff from developed lands (including both rural and urban areas), and managing rivers and floodplains for dynamic equilibrium.

The majority of these efforts are expected to occur at the local level. Unfortunately, the capacity of local partners, such as municipalities and non-governmental organizations, to take on this work is limited. These partners, while highly motivated, often have meager budgets and inadequate staffing. A recent survey of the 22 member organizations of Watersheds United Vermont, all watershed-based organizations in Vermont, shows an average full-time equivalent of 1.27 per organization and an average budget of \$62,273 (WUV, 2014). While an outstanding 95% of Vermont residents indicate that water quality is "very important" or "moderately important," more than any other surveyed policy issue, and many support that adequate funding be dedicated to water quality throughout the state the sentiment has yet to translate into substantial investments in water quality to date.

VTDEC asserts that the strategic placement of AmeriCorps members with various local partners throughout Vermont, in conjunction with support and technical guidance from VTDEC staff, will increase the number and effectiveness of actions taken to improve water quality in Vermont. Members will assist with: project identification, development and implementation; program delivery; education and outreach; project fundraising; volunteer recruitment and management; and technical support. These efforts will result in increased capacity to bolster ongoing efforts and undertake new

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initiatives and programs.

We specifically propose to deploy 5 MSYs to address nutrient export from small, medium and large farm operations, primarily in the Lake Champlain Watershed. A number of organizations, including the University of Vermont Extension Service and the Natural Resource Conservation Districts are already engaged in this work and would benefit from having a member assist them with: farmer education and outreach; best management practice identification and implementation; and, project tracking. We expect these efforts will lead to a change in or intent to change behavior by 25 individuals (National Performance Measure EN3.2). All activities will be tracked and verified by the host sites.

Ten MSYs will be placed with municipalities to mitigate stormwater runoff from developed lands, again with a primary focus on Lake Champlain. There are 136 municipalities affected by the quality of Lake Champlain. A major emphasis will be placed on the drainage of runoff from impervious cover, the management of back road runoff, and the improvement of public spaces and forests. Our vision is that each member would assist with: prioritizing, developing and implementing projects; mobilizing volunteers, community partners, and landowners; conducting assessments; identifying retrofit options; and, seeking grant opportunities to fund the work. It is anticipated that members will improve a total of 10 acres of public land (National Performance Measure EN4.1). All activities will be tracked and verified by host sites.

Five MSYs will focus on river and floodplain restoration and protection efforts. Riparian buffer plantings will make up the majority of this work as a large number of Vermont's watershed-based organizations and Natural Resource Conservation Districts have programs geared towards the establishment of buffers along waterways. Buffers assist in the filtering of pollutants from surface runoff and help stabilize streambanks and shorelines. Members will assist with: landowner education and outreach; assessments; development of restoration plans; volunteer coordination; project follow-up; and, projects reporting. We estimate that member efforts will result in a total of 2 miles of miles of waterway improved (National Performance Measure EN5.1). All activities will be tracked and verified by host sites.

Finally, career preparation is a significant part of the member experience. According to an Analysis of Green Jobs conducted by the Vermont Department of Labor in 2013:

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Green jobs play an important role in Vermont's economy. Vermont has the second highest concentration of green jobs in the nation. The Professional and Technical Services industry leads the state with the highest concentration of green jobs. This industry also has the highest growth rate since the recession started in December of 2007 and is expected to continue growing.

A skilled workforce is needed to meet this increasing demand. VTDEC is uniquely positioned to provide technical and professional training to all the ECO Vermont members, while community hosts and ECO Vermont Topic Leads mentor members in applying, improving and refining their skills. ECO Vermont is designed to have several training and networking opportunities throughout the members' terms of service. The desired outcome is that all of ECO Vermont's members will continue with environmental stewardship either professionally or as a leader in their community after service is completed. We have good evidence from Minnesota's GreenCorps model that many of their program alumni are employed, or in school in an area related to their service following their AmeriCorps placement. We expect at least 5 members will be placed in green jobs within 30 days after finishing the program (National Performance Measure EN2.1). VTDEC will keep in contact with all members after their service term has ended to determine where they eventually become employed. We understand that measurements for this final National Performance Measure will not be readily available until the second year of program implementation.

For more detail information, please refer to the attached Logic Model.

### 3. Evidence Base (8 points)

We have strong evidence that ECO Vermont will serve a great need in Vermont. The way it is structured will lead to positive outcomes, both in terms of environmental stewardship and career preparation for our members. The two studies we are submitting reveal: (1) the need for greater intervention strategies to reduce phosphorus loading in Lake Champlain; and (2) demonstrate the successes and recommendations of a model program operating in the state of Minnesota around issues of environmental conservation.

Strong Evidence: US Environmental Protection Agency (EPA) Phase I Total Maximum Daily Load

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(TMDL) Phase I Implementation Plan (March 2014), prepared by Vermont Department of Environmental Conservation. This recently released plan outlines the interventions required in the Lake Champlain watershed to meet phosphorus reduction targets. Specific, targeted, proven interventions are outlined in the report and include: expanded use of green stormwater infrastructure and low-impact development, improved management of roadways, implementation of best management practices on farms, and continued and strengthened river corridor and floodplain protection. The study shows the parts of Lake Champlain with the poorest water quality and will be used as a means to place members and select and prioritize projects. The study also gives background to the federal Clean Water Act and how Vermont's unique situation fits into it.

Strong Evidence: Minnesota GreenCorps Program Evaluation (2009-2013), prepared by MN GreenCorps and Minnesota Pollution Control Division. Much of the ECO Vermont program is modeled after the Minnesota GreenCorps program, recognizing that both states share many of the same goals of environmental conservation. This evaluation provides evidence that a state-coordinated conservation service program can be effective at engaging stakeholders, creating broader civic engagement, initiating and completing projects, and providing job training in the environmental and sustainability fields. There are also a number of lessons learned in this evaluation, which will shape how we build our program, particularly in the areas of: (1) performance measurement; (2) member-matching process with host sites; and (3) effectiveness of orientation and training with the use of Topic Leads and individual mentors. We have reached out to Minnesota GreenCorps on several occasions, and they in turn have been very helpful in sharing advice and guidance about their process.

#### 4. Notice Priority (3 points)

ECO Vermont is a Governor-Mayor Initiative. Governor Peter Shumlin and key Vermont Mayors in high-priority watersheds in the cities of Burlington, St. Albans and Winooski, recognize that phosphorus run-off impacts water quality. A recent press conference (January 2015) of the Vermont Mayors Coalition announced water quality improvement as one of their top two priorities. They each find value in ECO Vermont's program objectives and endorse the program as a whole. In addition, ECO Vermont has partnered with Watersheds United and the Vermont Association of Conservation Districts to identify host sites and potential projects at which members will serve. Please find each of their letters of support attached.

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### 5. Member Training (4 points)

There will be extensive opportunities for member training. Following the model of Minnesota GreenCorps and VHCB AmeriCorps, ECO Vermont will be planning a three-day orientation, bi-monthly one-day trainings on issues related to watershed management, green infrastructure, and agricultural best practices as well as professionalism and service reflection; and a wrap-up closure retreat. Orientation will include a review of all prohibited activities, which will be given by the AmeriCorps State Commission. Special attention will be given to how to avoid influencing legislation and getting involved in protests and advocacy. At each gathering, there will be opportunities to review AmeriCorps rules and expectations, reflect on AmeriCorps service, recommit to the AmeriCorps mission, and build upon the community spirit of members. ECO Vermont and VHCB AmeriCorps have created a plan to collaborate in providing member orientation and closure trainings. Their expertise and well-established presence in the state is a valuable resource as our program gets its bearings.

Minnesota GreenCorps structures quarterly trainings for their members by tapping into the knowledge and guidance of Topic Leads who help with building content for the trainings and serve as mentors to AmeriCorps members. We propose to do our trainings slightly differently, having one-day trainings every two months. As a state agency, VTDEC has a network of researchers and practitioners who will serve as Topic Leads. MN GreenCorps has had much success, as the program helps meet their agency goals while adding value to training the next generation of thought leaders. We will refer to this model in how we will approach training and link members to mentors in the field.

### 6. Member Supervision (3 points)

The strength of the program will depend upon the success to which ECO Vermont can build and support good working relationships with site supervisors. It is a high priority for this program, especially in its initial roll-out, to adequately prepare site supervisors for what is expected of them and to ensure, to the best of our ability, a good match for them and the AmeriCorps members. Communication will be key. We aim to achieve good matches through appropriate outreach during host site selection, being proactive in providing in-person training for host site supervisors at the beginning of the service term, performing at least one site visit to check in with supervisors and every

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member physically at their service sites, and engaging in a complete evaluation process at the conclusion of the term. Job descriptions will be provided by each host site at the start of the service term. Members will use the OnCorps system for tracking service hours and activities, which will be reviewed by supervisors, and signed off by the ECO Vermont Program Director. In addition, we will offer monthly conference calls available to members to troubleshoot problems and evaluate progress on the National Performance Measures we have identified. We recognize the importance of regular, high-quality check-ins with supervisors and members, especially being a new program. Answers to frequently asked questions will be posted in an identifiable section of our website for site supervisors. We seek to create an atmosphere of approachability and genuine care as members and host site supervisors settle into their relationships with each other.

We are currently in the midst of developing a survey for town leaders to measure what specific needs their community has identified that will fit with the priorities VTDEC has set for addressing water quality issues. The survey will include questions about municipalities' particular water quality needs, current projects they have undertaken, ideas for future interventions they are exploring, and any needs in terms of supporting a member that would be required. This survey will help us refine additional possible service sites in addition to the nonprofit partners and state departments we have already identified.

### 7. Member Experience (3 points)

The member experience will be a combination of traditional training and additional opportunities to demonstrate and apply what they have learned in their roles as ECO Vermont members. VTDEC has over 300 staff with a majority of them working in a water-related field. Our staff will be a valuable resource to members and provide additional opportunities to learn about careers in the environmental field as well as learn from our years of experience. We anticipate many will serve as formal mentors to members in individual pairings and others will advise as Topic Leads during bi-monthly trainings. VTDEC has a number of employees who have served as AmeriCorps members, in addition formal training opportunities, we will provide and facilitate networking opportunities for members to connect with VT DEC staff.

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The trainings we have planned will have future applicability in mind for members to use in current projects and in future employment. The trainings will include goal-making and reflection opportunities at each juncture, in addition to check-ins about their host sites. ECO Vermont members will have a chance to connect with members from other AmeriCorps programs in Vermont to further build upon the esprit de corps. We are collaborating with Vermont Housing and Conservation Board to learn from them how to orient and train our members to have a successful AmeriCorps term, and we look forward to providing networking opportunities between both member organizations.

We will set up optional conference calls for members to talk with each other about problem-solving, give opportunities for additional networking, and provide opportunities to connect with each other outside of the in-person trainings. This is a carryover from Minnesota's GreenCorps that they reported was very beneficial. It also contains the hope to confront problems as they arise rather than allow the issue to fester in an isolated fashion.

Depending on the exact geographic locations of member placements, we plan to hold occasional regional meetings to bring members and mentors together to build their relationships with each other and expand their networks.

Through rolling out this new program and Vermont's new water quality goals, our plan is to "brand" ECO Vermont as a part of the solution to cleaning up Lake Champlain. Members will feel part of a broader vision, with a number of opportunities to gain support, comradery and connections with each other, environmental professionals and Vermont communities. The root of success for ECO Vermont is establishing strong community connections through civic engagement. The importance of these values and involvement with local communities is one of our top priorities as it is a proven method to initiate social change and allow members to participate in a shared purpose.

Member recruitment will occur both within and outside local communities. The municipality, or other host site, will be engaged in recruitment from the beginning of the process and will provide suggestions for local recruitment of members. We will advertise positions in local newspapers and at Vermont universities and colleges. Furthermore, VTDEC has recently forged a new partnership with the University of Vermont to collaborate on more service-learning opportunities. We plan to utilize this partnership to identify students who may have an interest to continue work in the natural

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resources field by becoming ECO Vermont members.

### 8. Commitment to AmeriCorps Identification (3 points)

ECO Vermont will develop a communications plan that includes how to create awareness in local communities about both the members and the program. Once a member is placed in a community, the host site will: (1) post the member on their organization's website, and (2) be urged to contact the local newspaper to run a story on the new member and project. In addition, a webpage for ECO Vermont will be created on the Department of Environmental Conservation's website to describe the program and will feature blog postings of members' reflections and accomplishments. VTDEC will issue press releases when major project milestones are achieved, in hopes of spreading the knowledge of the program statewide.

ECO Vermont members will have sweatshirts, t-shirts and other material with logos that identify them as members of ECO Vermont and AmeriCorps. In addition, each member will have related AmeriCorps signage to display in office spaces. Branding this program with a consistent message and member identification is important to make this program effective and trusted in local communities.

Throughout the recruitment and placement processes, and during the service term itself, ECO Vermont members will be reminded what it means to be in AmeriCorps and the value they bring to their communities as AmeriCorps members.

### **Organizational Capability**

#### C. Organizational Capability (25 percent)

##### 1. Organizational Background and Staffing (10 points for new applicants)

As a state agency, the Department of Environmental Conservation has the staffing, management structure, and support to get this program started and sustained. While administering the program itself is new to the Department, some of the current staff involved in its creation are former AmeriCorps members and are familiar with the operational needs of a successful program. Department staff members are motivated and have a high level of accountability as our performance and budget is overseen by the Vermont General Assembly. The Department is the recipient of a number of federal grants and has business practices in place to ensure proper internal controls. In addition, the federal grants administrator has been working closely to ensure all parts of this

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application are complete and in compliance with standard business procedures.

ECO Vermont has reached out to several community partners and plans to continue outreach efforts over the next few months to refine program design and compile potential service plans for members. In addition to the dedicated support of VTDEC, as part of the program design, we are developing partnerships with the following organizations: (1) Vermont Association of Conservation Districts, Watersheds United Vermont and the Vermont Agency of Agriculture Food and Markets -- primarily to assist with the identification and implementation of projects; (2) VHCB AmeriCorps to collaborate on member and supervisor training, member and host site matching; and (3) Mayors and town leaders in key communities in the Lake Champlain watershed -- as key collaborators and leaders their communities to support the efforts of ECO Vermont members.

If awarded AmeriCorps funding, ECO Vermont will be poised to hire a Program Director to formalize host site selection and member recruitment. The Program Director will be an employee of the State of Vermont and overseen by the central office of Planning and Management in VTDEC. In the meantime, a planning oversight team consisting of several members of VTDEC will be assembled in January to lay the foundation for the program until a Program Director can be hired. Logistical steps for that team include: recruiting the remaining host sites, maintaining a sheet of Frequently Asked Questions for potential members and host site supervisors, securing public and private funding commitments, and preparing a work plan for a Program Director.

### 2. Compliance and Accountability (15 points for new applicants)

ECO Vermont will have a Program Director who will ultimately be responsible for ensuring that the program is in compliance programmatically with the AmeriCorps rules and who will provide support to members and site supervisors. The Program Director will schedule site visits with site supervisors and members, follow up with inquiries and issues, arrange all trainings, and oversee final submittal of timesheets through the OnCorps reporting system. ECO Vermont will also utilize a Department federal grants specialist with expertise in fiscal grant management conducting oversight of management of funds and quarterly financial reporting.

The Program Director will address alleged non-compliance as soon as any issue is identified. To

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monitor compliance with AmeriCorps rules, the Program Director will conduct a site review of each member at the two-month mark and again at the halfway mark. A site visit will occur sometime between these reviews, or sooner if needed. In addition, staff from the Department of Environmental Conservation Commissioner's Office will meet with the ECO Vermont Program Director to assess program activity on a quarterly basis. Part of the check-in will be to ensure proper documentation and adherence to the rules is occurring. The program will be especially vulnerable in its early stages, and we recognize the importance of using the most effective techniques to monitor compliance and offering the right level of support for all involved.

A team of program-oriented and financial staff, along with management and oversight directly from VTDEC's Commissioner's Office, will serve as a strong system with multiple levels of accountability. The Department of Environmental Conservation currently manages over 60 federal grants from a range of federal agencies including the US Environmental Protection Agency (EPA), the Department of Defense, Federal Emergency Management Agency (FEMA) and the US Department of Agriculture. No financial issues have been identified through federal auditing in over six years. In addition to a commitment to financial accountability, VTDEC is also engaged in Results Based Accountability (RBA) practices and is deeply vested in having strong performance outcomes.

All ECO Vermont members and host site contracts will be reviewed by the Department's General Counsel, in addition to any sub-contracting agreements for legal concurrence.

Special attention will be given to make sure members are not replacing jobs in the State of Vermont or any other entities that are engaged in collective bargaining agreements. The work performed by ECO Vermont members is not work that VTDEC or our partner organizations could effectively do on their own.

Department staff, along with the ECO Vermont Program Director, will perform an evaluation of the program at the completion of the first year of the program. While we do not anticipate hiring an outside consultant, funds are set aside in the budget in the event that we cannot adequately perform the evaluation with existing resources.

### **Cost Effectiveness and Budget Adequacy**

D. Cost Effectiveness and Budget Adequacy (25 percent) --

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### 1. Cost Effectiveness (18 points)

The budget for this program includes a comprehensive plan to design, implement and execute a successful program. The Grantee portion of the match is 45% from a combination of local funds (host site matches), state and private funds. The Department plans to create a new position to coordinate this program and to utilize existing business and office procedures and staff, to the extent possible, to support ECO Vermont members. Although it is not specifically included in the budget or outlined in the budget narrative, VTDEC staff will invest a significant amount of time overseeing projects, training and mentoring ECO Vermont members throughout their service terms. As the program develops, ECO Vermont will continue to reach out to private funders and foundations to support the operating budget for this program.

The total program budget for one year includes \$217,130 from Grantee (host site matches - \$112,500, and \$104,630 from VTDEC and/or foundation cash match), \$263,384 from CNCS. The average cost per MSY is \$13,169.

### **Evaluation Summary or Plan**

Department staff, along with the ECO Vermont Program Director, will perform an evaluation of the program at the completion of the first year of the program. While we do not anticipate hiring an outside consultant, funds are set aside in the budget in the event that we can not adequately perform the evaluation with existing resources.

### **Amendment Justification**

n/a

### **Clarification Summary**

Based on clarification questions, the following edits have been made to the grant application:

1) The cost per MSY has been slightly reduced to \$13,169. Because this is a new program, the cost per MSY is close to the maximum allowable cost. We anticipate this cost to decrease in subsequent grant years as the Department determines how to leverage additional funding for the program and utilize our staff resources to support the program.

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2) Please confirm the EIN number entered on the 424 screen.

VT DEC W-9 with EIN number has been sent as an attachment. The Department of Environmental Conservation has an EIN number, it is 36000274 which is the same number on the FaceSheet.

3) If the program has had an A-133 completed, please forward a copy to the CNCS grants officer.

State of Vermont Form A-133 has been sent as an attachment.

4) Section IB., Personnel DEC Staff benefit Package-Please breakout the 38% fringe rate.

This breakout is included in the budget narrative.

5) C. Travel/Staff Travel-Travel to CNCS Sponsored Meetings- Please clarify the purpose and calculation. We have budgeted \$2000 to send two staff to CNCS sponsored meeting. The purpose of staff travel to CNCS sponsored meetings is to learn from other programs and CNCS about effectively implementing and operating an AmeriCorps program.

Details have been added to the budget narrative.

6) Member Travel-Member Accommodations-Please provide more detail in this line item with the expenses included and the calculation for the total. The detail should include the number of meetings and trainings and the costs associated with each.

Details have been added to the budget narrative.

7) E. Supplies, Member Service Gear-Please provide a calculation for the total included in this line item. Details have been added to the budget narrative.

8) G. Staff training-Include only staff training in this line item and provide more detail on the costs

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associated with the various expenses. Details added to the budget narrative.

9) Member Training- Please provide more detail on the costs associated with the various expenses included in this line item.

Details have been added to the budget narrative.

10) Section III, Approved Indirect Cost Rate-Please provide a copy of the federally approved indirect cost rate to the grants officer. Only federally approved indirect cost rates may be applied here.

A copy of the federally approved indirect cost rate for State FY16 is attached. The rate is decreasing from 33.43% in FY15 to 22.85% in FY16. This change decreases the indirect amount requested from \$12,500 to \$11,383.

11) For EN5.1, waterways must be assessed by the managing entity/land manager as having been improved to an acceptable level as defined by the sponsoring agency or land manager in accordance with their natural resources plan. Please revise the instrument description to meet the requirement.

The performance measure outcome tracking has been modified to include State of Vermont Watershed Management Division to validate miles of river improved by estimating nutrient loading reduction and using chemical and biological stream assessments to assess improvements to waterways.

12) D. Strategic Engagement Slots. We carefully considered editing our application to create opportunities for persons with disabilities. While we decided not to move forward at this time with a proposal, we plan to continue development and include proposals for persons with disabilities in coming years.

13) At this time, we can not add additional no-cost MSYs. Because we are a new program, we have selected to start our program with a manageable size.

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## Continuation Changes

n/a

## Grant Characteristics