**Comments for FY2016 319 Nonpoint Source Preliminary Project Proposal**

**Sponsor:** Lincoln Conservation District

**Project Title:** Tobacco River Restoration Project – Phase 1 Final Design and Implementation

**319 Request:** $271,746

**DEQ Prj Mgr:** Eric Trum (406) 444-0531 [etrum@mt.gov](mailto:etrum@mt.gov)

* 319 funding is competitive this year. Your funding request needs to be adequate, but not excessive.
* Prior to filling out the Final Project Proposal form, do the following:
  + Reread the Call For Project Proposals for FY2016, especially Attachment A – Project Scoring Sheet
  + Reread the Instructions for Completing 319 NPS Preliminary and Final Project Proposals (the Form Instructions)
  + Contact your DEQ Project Manager (noted above) for additional assistance
* Your Final Project Proposal must clearly demonstrate that all aspects of your project meet the following eligibility requirements:
  + Address nonpoint source pollution
  + Address impairments identified in Montana’s 2014 List of Impaired Waters
  + Implement goals and objectives identified in the 2012 Montana Nonpoint Source Management Plan
  + Directly implement projects or activities identified in a DEQ-accepted Watershed Restoration Plan (WRP)
* Proofread your Final Project Proposal. You may wish to read it out loud or ask a colleague to read it and provide comment.
* Complete all elements of the Final Project Proposal form. Pay special attention to the information requested in Section 1, as it seems to be a common source of errors. In Section 1 of the Final Project Proposal form, you do not need to include SWCDMI mini-grants in the list of open contracts.
* Section IV: Scope of Work must contain a separate task for each of the activities identified below where applicable. Attachment B of the Call For Project Proposals for FY2016 contains example template language for each of the four tasks:
  + Monitoring – For proposals involving on-the-ground projects, monitoring should evaluate the success of the project at reducing nonpoint source pollution. For projects addressing nitrogen, phosphorus, or sediment, the monitoring task must include estimation of annual pollutant load reductions. For E&O projects, monitoring should include an evaluation of the activities’ effectiveness in reaching the target audience and achieving the desired outcomes.
  + Education and Outreach (E&O) – For proposals involving on-the-ground projects, E&O activities should be directly related to the project. To a limited extent, project sponsors may apply for funding for E&O projects that are not specifically related to an on-the-ground project, provided that the E&O projects are identified in their Watershed Restoration Plan.
  + Operation and Maintenance, Landowner Agreements – This only applies to contracts involving on-the-ground projects. Landowner agreements must address project design and implementation, revegetation of disturbed areas, operation and maintenance (for the life of the practice), and site access.
  + Contract Administration – Deliverables include status reports, annual reports and a final report as well as appropriate billing and contract management. The 319 funds requested for administrative activities must not exceed 10% of the total 319 funds request in your proposal; however, local match associated with administrative activities can exceed the 10% cap.
* Review all task timelines, the project milestone table, and other date-related information in the Final Project Proposal. Dates must be consistent with the anticipated 319 funding schedule. Funding is not likely to be available until late June or July, 2016, and contract work needs to be completed within 2 to 3 years.
* Remember to include all applicable attachments (see Section IV of the Final Project Proposal form).
* Late or incomplete Final Project Proposal Forms will not be considered. If you have any questions please call your DEQ Project Manager well before the Final Project Proposal due date of September 28, 2015.

*Other Comments*

* Be sure to include a draft of the Watershed Restoration Plan (WRP).
* In addition to sedimentation/siltation causing impairment on the Tobacco River, it has a non-pollutant impairment listing for physical substrate habitat alterations.
* Further describe how the phasing of the project will take place and how this phase can function as a discrete stand-alone project.
* Further describe why this is the appropriate next step and the necessary approach (as opposed to a more passive approach) for addressing and improving the existing impairments on the Tobacco River.
* Further describe the efforts of the landowner to make this a showpiece for other projects, including efforts to alter grazing management to benefit riparian systems, developing a riparian easement to permanently protect riparian areas, public access potential through adjacent rails to trails corridor, and signage that would increase public education and outreach.
* Although current designs suggest that there will be no rise in the base flood elevation as a result of the project. We suggest contacting your local floodplain administrator to ensure that there will be no further unanticipated costs or analyses needed. Note: As part of the reforms implemented under the Homeowner Flood Insurance Affordability Act of 2014 (HFIAA), CLOMR/LOMR review/processing fees for habitat restoration projects are now exempt. This change is reflected in FEMA Standard 616, which went effective July 31st, 2015.
* Consider whether the administrative fees ($8,750) for this project are sufficient for reporting and documentation. The call for project proposals allows up to 10% of the 319 funding to be applied to administrative costs. Additionally, please check your budget carefully – the administrative fee identified in “Project Funding” is inconsistent with your Task 1 “Project Management and Grant Administration”.