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

**Sponsor:** Park Conservation District

**Project Title:** Brackett Creek Sub-Watershed Sediment Reduction

**319 Request:** $94,050.00

**DEQ Prj Mgr:** Mark Ockey (406) 444-5351 [mockey@mt.gov](mailto:mockey@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*

* If $94,050 in 319 funds are requested, $62,700 in non-federal matching funds would be required, as opposed to the $58,000 identified in the Preliminary Project Proposal.
* It appears that the project area is in a Zone A Special Flood Hazard Area (SFHA), as defined by FEMA. Prior to submitting a Final Project Proposal, contact your local floodplain coordinator to determine what kind of engineering/surveying analyses might be necessary for construction. Make sure that you have adequate funding (319, match, other) to cover all foreseeable costs.
* Based on a DEQ site visit, there is some uncertainty as to whether or not active headcutting and channel incision might be occurring within the project area and might also be moving up from stream reaches below the project area. Consider working on the project in phases to ensure adequate time to get through the surveying, design, permitting, and cost estimation processes. For example, consider applying for FY2016 319 funding for surveying, design, permitting, cost estimation, and outreach and education, and then seeking additional funding in a subsequent 319 cycle to complete the on-the-ground implementation work.
* In past years, Park CD has struggled to demonstrate the necessary administrative and communication skills to prepare a complete, competitive 319 project proposal. This was a significant contributing factor leading to several failed attempts at obtaining 319 funding for projects in the Shields River watershed. DEQ commends Park CD for making a substantial effort this year to communicate early and often. DEQ encourages Park CD to continue to seek out and work closely with DEQ staff and other available resources, including MACD staff, the Montana Watershed Coordination Council, and DNRC’s Conservation and Resource Development Division.
* Consider requesting the full 10% allowed for contract administration costs.
* Increase your funding request for Task 6 Education and Outreach, and add a deliverable for the Park CD Administrator, one Park CD Board member, and one Shields Valley Watershed Group member to each attend two professional development trainings (e.g. MWCC Symposium/training, MACD/DNRC-sponsored training for CD Administrators, or other similar events).
* We recommend broadening your base of partners and support. In addition to current resources, connect with the FWP Regional Fisheries Biologist (Scott Opitz), Trout Unlimited, and other sources of public and private expertise and support for project development, design and implementation.
* Consider the use of additional woody vegetation besides willows to help stabilize the creek banks.