

Fiscal Year 2024 (Round 2) Nonpoint Source Project Comment Summary

On February 12, 2024, the Montana Department of Environmental Quality (DEQ) issued the *2024 Round 2 Call for Nonpoint Source Pollution Reduction Applications* (FY2024 Round 2 Call). The funding supporting the FY2024 Round 2 Call comes from an EPA Clean Water Act §319 grant and money allocated from the 2023 legislative session to the Montana Department of Natural Resources and Conservation (DNRC) Renewable Resource Grant and Loan program.

In response to the Call, DEQ received 16 applications, 1 of which arrived after the submittal deadline and could not be accepted or evaluated.

On April 18, 2024, DEQ hosted an Agency Review Panel to gather input from state and federal agency representatives to help guide DEQ’s selection of which projects to fund. Each applicant was given the opportunity to engage with the Panel in a brief Q&A session in the morning. The Panelists scored the applications based on a rubric provided by DEQ, and then spent the afternoon discussing the merits of each application.

Table 1 – Agency Review Panel Members

Member Name	Member Affiliation
Nina Denny	Montana Department of Natural Resources and Conservation
Heather Henry	Montana Department of Environmental Quality, Total Maximum Daily Load Section
Kylee Hughes	Montana Department of Natural Resources and Conservation, Renewable Resource Grant and Loan Program
Austin McCullough	United States Fish and Wildlife Service, Montana Ecological Services
John Peterson	Montana Department of Agriculture, Groundwater Section
Hannah Riedl (Panel Chair)	Montana Department of Environmental Quality, Nonpoint Source and Wetlands Section
Nikki Sandve	Montana Department of Natural Resources and Conservation, Planning, Implementation, and Communications Bureau
Keenan Storrar	Montana Department of Environmental Quality, 401 Certification Program
Adam Strainer	Montana Department of Fish, Wildlife and Parks, Fisheries Division Habitat Bureau Chief
Lauren Sweeny	Montana Department of Environmental Quality, Standards and Modeling Section
Lindsay Volpe	Montana Department of Natural Resources and Conservation, Renewable Resource Grant and Loan Program
Cory Wolfe	United States Department of Agriculture, Natural Resources Conservation Service

Other Agency Review Panel Meeting Attendees

Attendee	Affiliation
Jake Atkinson	DEQ Nonpoint Source and Wetlands Section
Heather Barber	Bitterroot Water Partnership
Rayelynn Brandl	Clark Fork Watershed Education Program
Ashley Brubaker	Trout Unlimited
Steve Carpenedo	DEQ Nonpoint Source and Wetlands Section
Torie Haraldson	DEQ Nonpoint Source and Wetlands Section
Ben LaPorte	Big Hole Watershed Committee
Meagan Larson	Bitterroot Water Partnership
Tiffany Lyden	DEQ Nonpoint Source and Wetlands Section
Chris Mahony	USDA Natural Resources Conservation Service
Lilly McLane	Gallatin Watershed Council
Mark Ockey	DEQ Nonpoint Source and Wetlands Section
Connor Parrish	Trout Unlimited
Paul Parson	Trout Unlimited
Dr Chris Pavlovich	Clark Fork Watershed Education Program
Brenna Rietmann	Montana Association of Conservation Districts
Tess Scanlon	Trout Unlimited
Adam Switalski	Clark Fork Coalition
Margarite Thomas	City of Kalispell
Andy Ulven	DEQ Water Quality Planning Bureau

Reviewer Comments

DEQ compiled comments provided by members of the Agency Review Panel and comments provided by DEQ Nonpoint Source and Wetlands Section staff. The comments and suggestions below reflect the opinions expressed by reviewers, and do not necessarily represent the views of DEQ, EPA, or any specific partner entity. Responses to questions posed by reviewers varied in their level of completeness and will ultimately be addressed during contracting; therefore, they are not provided in this summary.

Project Name: **Camp Creek Headwaters Restoration**

Project Sponsor: Trout Unlimited

Project Representatives: Connor Parrish (TU)

Comments

- Have you considered leaving the livestock/wildlife exclusion fencing up permanently?
- Do you have support from FWP for the BDA design?
- Would the landowner be willing to contribute financially to the cost of the fencing?
- Who will be responsible for long-term maintenance of the fencing and the BDAs?
- Some reviewers would have liked to have seen a larger match contribution associated with the project.

- Are there ways to reduce expenses associated with the proposed fencing?
- Is natural beaver recolonization a possibility for this project area?
- How will the BDAs be maintained?
- It's unclear how/if this project will be used to encourage other landowners to do similar projects.
- Will there be any long-term E&O benefit from this project?
- If a contract is awarded, the applicant will need to become registered with the System for Award Management (SAM).
- If a contract is awarded, the applicant will need to obtain adequate liability insurance.

Project Name: **Canyon Creek Stream Restoration and Monitoring**

Project Sponsor: Trout Unlimited

Project Representatives: Ashley Brubaker (TU)

Comments

- Do you have support from FWP for the project?
- If you install a fish barrier, what kind of structure would you use?
- What is the condition of the downstream fish habitat?
- Would beaver recolonize the area naturally? Would beaver be allowed to recolonize after the project is implemented?
- Do you have any federal funding involved in the project?
- Would there be a grazing management plan included in the project?
- Reviewers generally supported the intent of the project, but felt more planning was needed. DEQ encourages the applicant to reapply once more is known about the fate of the dam.
- The monitoring budget was significantly higher for this project than for others. However, reviewers thought it would be beneficial to future projects to get a better understanding of how well LTPBR and BDA structures improve water quality.
- The proposed monitoring would likely require development of a DEQ-approved sampling and analysis plan.
- Several of the project partners did not provide letters of support.
- What are the root causes of pollution (e.g., why has the stream downcut and become incised)?
- Why are BDAs and PALs the best technique for this project area?

Project Name: **Spring Creek Farms: Camp Creek Restoration**

Project Sponsor: Gallatin Watershed Council

Project Representatives: Lilly McLane (GWC), Chris Mahony (USDA, NRCS)

Comments

- The DEQ application requires a letter of support from each landowner involved in the project, even if the project will only be used as match. Unfortunately, a letter of support was not submitted for the downstream (Warm Spring) portion of the project. Absent a letter of support from the landowner, the downstream portion of the project cannot be considered eligible for inclusion in the application. The upstream part of the project remains eligible.

- Is there a reason why a bypass channel is being proposed instead of restoring Warm Spring Creek in its current location?
- Reviewers generally had a difficult time understanding what was being proposed. In the future, please consider breaking projects on separate landowners' land into two projects and submitting a supplemental project form to allow for more space to explain the details of each project.
- DEQ strongly recommends that applicants submit a draft application for review a week or so before final applications are due.
- Has the cost of floodplain permitting been factored into the total project cost?

Project Name: **Miller Creek 7 Mile Restoration**

Project Sponsor: Clark Fork Coalition

Project Representatives: Adam Switalski (CFC)

Comments

- Have you factored County floodplain permitting costs into the request?
- Are you/have you sought funding from other sources to cover the overages you're experiencing?
- Please describe any grazing management plans for the project area.
- What materials will be used to harden the stream crossing?
- Funding is necessary to cover unforeseen costs. Since DEQ has already approved the project once, it makes sense to provide the additional funding to ensure the project gets finished.
- FWP is currently picking up fish out of the lower end of Miller Creek and transporting them past a dewatered reach so they can reach the headwaters.

Project Name: **Elkhorn Ranch Bank Revegetation and Fencing Project**

Project Sponsor: Big Hole Watershed Committee

Project Representatives: Ben LaPorte (BHWC)

Comments

- What is the potential for ice damage or damage from high flows to the proposed plantings?
- The cost for cutting willows seems high. Would it be possible to use volunteers to help reduce the cost of obtaining willow cuttings?
- If you received partial funding, which parts of the project would you prioritize?
- If you installed livestock exclusion fencing, would natural regeneration be enough to restore willow habitat?
- Given the width of the river, it seems unlikely that shading from willows will have a measurable impact on stream temperature.
- Mt Haggin seems like a long way to go to gather and transport willows.
- Some reviewers felt the fencing was the most beneficial aspect of the project.
- Please make sure to account for the possibility of ice damage in the winter.
- This project would be a great way to build trust with local landowners.

Project Name: **Ninemile Reach 7 Placer Mine Reclamation**

Project Sponsor: Trout Unlimited

Project Representatives: Paul Parson (TU)

Comments

- Are the landowners contributing to the project?
- Will this project address all of the impacts up in this section of the Ninemile, or will there still be some work left once Reach 7 is complete?
- Are there any Bull Trout in the stream?
- Have you seen improvements in sediment, temperature, habitat or other impairment conditions in previous sections of the project?
- Is there any grazing within the project area?
- Do you anticipate additional research and monitoring collaboration with the University of Montana?
- It's great to see the mainstem work finishing up. It's been an exceptionally good project.
- This project was difficult to find on the internet. It would be great to have a bit more of a web presence with better search engine optimization. There is a great cautionary tale to tell for folks to consider when contemplating resource extraction activities in the future.
- This project has good partner support.
- The restoration techniques used so far have been very successful at restoring natural processes and conditions.

Project Name: **24 0322 Spring Creek Stormwater Treatment at Meridian North Drainage**

Project Sponsor: City of Kalispell

Project Representatives: Margarite Thomas (City of Kalispell)

Comments

- Have you pursued State Revolving Fund money for this project?
- If your project received partial funding, would the project still move forward?
- To what extent have previously installed similar structures been shown to remove sediment?
- The project addresses a point source discharge, and the funding source is intended to address nonpoint source pollution.
- Other funding resources may be more appropriate for this project (e.g., the State Revolving Fund, loan options).

Project Name: **Flint Creek Phase 3 Habitat Restoration Project**

Project Sponsor: Trout Unlimited

Project Representatives: Tess Scanlon (TU)

Comments

- Is the funding request solely for the reach downstream of the bridge?
- Why does the preliminary design show a considerable amount of work on the upstream end of the project and less on the lower half?

- Will the corrals near the bridge be removed, or set back?
- If you were to receive partial funding, which parts of the project would you prioritize?
- What is the source of the “other” column funding in your budget?
- Is there a potential to reduce excavation costs?
- It was unclear from the application that the project did not include implementation of the work proposed for upstream of the bridge.
- Reviewers appreciated the connection between this and previous phases of the project.
- Reviewers appreciated the public visibility of the project and the potential to dramatically reduce sediment loading to Flint Creek.
- Has the cost of floodplain permitting been built into the budget?
- If awarded a contract, the applicant will be required to obtain adequate liability insurance.
- Is the landowner contributing to the project?

Project Name: **Addressing Spike in NPS Pollution Inputs Post-Wildfire in the Tolan Creek Drainage of Impaired East Fork Bitterroot**

Project Sponsor: Bitterroot Water Partnership

Project Representatives: Heather Barber (BWP)

Comments

- Has the Forest Service already started work in the area?
- Why did the Forest Service decide to treat to “storage” instead of “decommissioning”?
- How are the cut and fill slopes stabilized under the “storage” scenario? Will it successfully reduce sediment pollution?
- How much sediment pollution is currently coming from the road, vs from other parts of the burned landscape? Are roads the most significant source of nonpoint source pollution within the watershed?
- Are any of the crossings you are proposing to replace currently acting as fish barriers?
- Please work with the Forest Service and FWP to determine whether removing existing fish passage barriers will jeopardize genetically pure native fish populations.
- Some reviewers suggested that the Forest Service should contribute more to this project.

Project Name: **Educating, Engaging, and Empowering a Collaborative to Innovatively Address NPS Pollution in the Bitterroot**

Project Sponsor: Bitterroot Water Partnership

Project Representatives: Heather Barber (BWP)

Comments

- Please describe the Teton Valley outreach document. Where did it originate? Would you reprint it, or create something specific to the Bitterroot?
- Please describe the structure of the group you plan to convene.
- The application was well-written and easy to understand.

- Great job proposing a project that looks at the long game and seeks funding to have community conversations that are necessary but whose effects are often difficult to quantify.
- The project didn't seem to have specific deliverables stemming from the proposed meetings, though this may simply be the nature of the beast with these types of efforts.
- The hourly rate proposed for the consultant's work on the project seems high.
- If awarded a contract, the applicant will need to become registered with the System for Award Management (SAM) and obtain any necessary liability insurance.

Project Name: **Sun River Water Quality Program**

Project Sponsor: Sun River Watershed Group

Project Representatives: *no representative present*

Comments

- Please describe how the presentations associated with the rain barrel project incorporate nonpoint source pollution.
- What is your process for recruiting volunteers?
- Some of the proposed work is scheduled for this summer, and funding likely won't be available until this fall. How will this impact your proposed project?
- This is a relatively small request for funding.
- What is your process for training water quality monitoring volunteers.
- Baseline monitoring not tied to an on-the-ground project is not eligible for nonpoint source funding.
- The rain barrel project is a repeat from previous years.
- It would have been great to have the applicant available for question and answer during the Agency Review Panel meeting.

Project Name: **Seeley Lake Non-point Source Coordination, Outreach and Education**

Project Sponsor: Clearwater Resource Council

Project Representatives: *no representative present*

Comments

- Some of the proposed work is scheduled for this summer, and funding likely won't be available until this fall. How will this impact your proposed project?
- Some of the budget items were unclear.
- It would have been great to have the applicant available for question and answer during the Agency Review Panel meeting.

Project Name: **Process-based, low-tech restoration education and project implementation training for landowners**

Project Sponsor: Montana Technological University Clark Fork Watershed Education Program

Project Representatives: Rayelynn Brandl (CFWEP)

Comments

- What is your process for finding landowner participants?
- How much time would be spent by landowners completing online modules vs one-on-one with staff.
- How would this work differ from existing LTPBR and BDA training currently available?
- Which parameters would you include in your monitoring program?
- Will there be a cost for people to access the Guide?
- Will this project also have funding from other sources?
- The project will provide some great ongoing coaching for landowners interested in LTPBR.
- If water chemistry data will be collected, a DEQ-approved Sampling and Analysis Plan (SAP) will need to be developed and data will need to be uploaded to DEQ's data portal.
- Very innovative approach.
- The application was well-written.
- Educational materials and other publications produced using nonpoint source funding must be made available for copy, reproduction, and use by DEQ, EPA, and the general public.

Project Name: **Rolling Rivers Trailer Education and Outreach**

Project Sponsor: Montana Association of Conservation Districts

Project Representatives: Brenna Rietmann

Comments

- What will be done to ensure trailers aren't stolen in the future?
- Has MACD reviewed the Flathead Sourcebook or other potentially already available training materials? These existing materials should be used whenever possible, rather than trying to develop new publications.
- Please describe the metrics you will use to gauge the impact of deploying the trailers.
- What are local CDs contributing towards this effort?

Project Name: **MWCC Strategic Watershed Program & Education Planning with a Twist of Public E&O**

Project Sponsor: Montana Watershed Coordination Council

Project Representatives: Amy Seaman

Comments

- It would be interesting to track the number of people you engage with at successive art walks.
- Have you considered tabling at the Art Walk alongside the local watershed group?
- It's unclear whether strategic planning is an appropriate fit for this funding source.
- It's unclear how "Spectrum Reach" fits into the project.
- Nonpoint source funding cannot be used to pay honorariums.
- Not enough information was provided in the application to determine what work would be done under Task 3.

General Comments on This Round of Nonpoint Source Project Funding

- Agency Review Panel members would like additional guidance on how to fill out the scoring sheets.
- It would be helpful for reviewers to have questions in the application form match up more linearly with questions in the scoring sheet.
- It would be helpful to ask applicants to more clearly outline the nonpoint source goals for their project and the metrics they will use to determine whether those goals have been met.
- Some applicants expressed a desire for more time and opportunity to respond to questions from the Agency Review Panel.
- Applicants and reviewers would benefit from greater clarity on how DEQ considers financial need when evaluating potential projects.