



## Q&A – FY2024 319 GRANT PROJECTS PROGRAM

This document will be periodically updated between now and October 6<sup>th</sup> as DEQ responds to questions regarding the FY2024 Call for Applications. As DEQ staff respond to questions from the public, we frequently provide answers that could apply to a broad spectrum of projects. This Q&A document is intended to provide make these answers more accessible to other applicants who may have similar questions. Please reach out to Mark Ockey at 406-465-0039 or [mockey@mt.gov](mailto:mockey@mt.gov) if you have additional questions.

**Q:** Does match have to be secured prior to applying for 319 funding?

**A:** No. This is not a requirement. However, applicants should at least have some idea of where they may be able to obtain matching funds.

**Q:** Do landowner agreements have to be in place prior to applying for 319 funding?

**A:** No. Landowner agreements are frequently listed as a task to be done once a 319 contract is signed.

**Q:** To whom should letters of support be addressed?

**A:** We are flexible, as long as it's clear that the letters pertain to the project for which you are seeking funding. "DEQ", "DEQ 319 Grant Review Panel", and "Mark Ockey" are probably the most common.

**Q:** Should I ask the folks providing letters of support to send them directly to DEQ, or should I ask them to send them to me so I can submit them with the rest of the application?

**A:** DEQ will accept them either way. However, it is good practice to have them sent to you to upload, just so you can make sure they don't get lost in the mail. Letters of support received by DEQ after 5pm on October 6<sup>th</sup> will not be considered.

**Q:** My watershed group would like to do some riparian revegetation work on a couple of streams within our watershed. We have spoken with a few landowners, but probably won't have any specific project sites secured prior to when applications are due. Can we go ahead and apply for funding now, and identify specific project sites later?

**A:** This may be allowable within the scope of the FY2024 Call for Applications, but the project would not likely compete well. It would probably be better to wait to apply until sites have been clearly identified and landowner support can be verified. The one possible exception to this recommendation would be if you were to apply for funding to run a mini-grant program (see Section 5.2 of the Call for Applications). However, mini-grant programs must have a multi-county focus.

**Q:** Can 319 funds be used to fund projects on Tribal lands?

**A:** Yes, provided that the projects will reduce nonpoint source pollution in a stream, lake or wetland that flows off Tribal lands and then contributes to an impairment identified on Montana's 2020 List of Impaired Waters?

**Q:** Does DEQ consider an EPA-approved Tribal nonpoint source plan as being equivalent to a DEQ-accepted Watershed Restoration Plan for the purposes of determining 319 funding eligibility?

**A:** Yes.

**Q:** My organization recently had to cancel an existing 319 contract because the landowner backed out. Will this negatively affect our chances of getting future 319 funding?

**A:** Generally speaking, No. There are some things that are beyond the control of the sponsoring organization. Landowners can change their minds, a flood could come through and wipe out the project site, and anticipated sources of match can fall through. Provided that you didn't deliberately insult the landowner, bust open a dam to cause the flood, or tried to rely on lottery tickets to come up with match, your opportunities for future funding will not be impacted.

**Q:** Can poor performance on previously held state funding agreements affect my organization's chances of acquiring 319 funding?

**A:** Yes.

**Q:** Can 319 funding be used to support project design and engineering, even when construction might not occur under the same 319 contract?

**A:** Yes.

**Q:** If I complete design work or construction before signing a 319 contract, can I claim those expenses as match or bill them against the contract?

**A:** No.

**Q:** When can 319 funding be used to pay for water quality monitoring?

**A:** Only when monitoring the water quality effects of a particular project. 319 funds cannot be used to support watershed characterization studies, pollution source identification monitoring, or long-term trend monitoring.

**Q:** Can I use 319 funds to buy lunch for volunteers at an event?

**A:** No. 319 funds cannot be used to purchase food.

**Q:** If I am in the process of developing a Watershed Restoration Plan, but don't yet have one, can I still apply for 319 funding?

**A:** If you do not have a DEQ-accepted WRP or an EPA-approved Tribal nonpoint source plan by the application deadline, you must submit a draft prior to applying for funding. DEQ staff will review the draft and estimate the likelihood of it being ready prior to January 31, 2024.

**Q:** For grant administration, does DEQ require time tracking for this task, submission of a timesheet, and an hourly rate justification like DNRC? Or can I just apply for the blanket 10%/\$12,000 (whichever is cheaper) and just request 10% of the invoiced amount on each report?

**A:** 319 funds, including those applicable to grant administration, are provided on a reimbursement basis. In other words, funding requested needs to be tied to specific expenses incurred, and those expenses need to be tied to work done to implement the specific activities identified in the contract. DEQ generally doesn't require submission of a timesheet and an hourly rate justification. However, we do expect contractors be able to document expenses if asked to do so (e.g. in the event of an audit).

**Q:** If I have an Americorps volunteer working on a project, can I report the difference between a published value of volunteer labor rate and the Americorps volunteer's federal stipend rate as nonfederal match?

**A:** Yes.

**Q:** I was wondering if education and outreach deliverables are a requirement for on-the-ground projects? Or if we did not include education and outreach plan for the project, would this negatively impact consideration of our application?

**A:** Yes, we do require all applicants for on-the-ground project funding to include an education and outreach task (see page 9 of the Call for Applications, under “Education and Outreach Requirements”). There is a \$5k cap on 319 funding for this task. Typically, we see folks do things like holding a site visit tour for local landowners to try and interest other people in doing similar work on their land, or perhaps post updates and photos of project progress on the group’s website or Facebook account, or even organize a work day where the public can come work on some aspect of the project. The nice thing about in-person E&O activities is that you can count participant’s time as non-federal match. For example, if you have 10 volunteers show up to help plant a new riparian buffer, and they all work for 4 hours, you can estimate what it would have cost to hire 10 workers to come provide labor (about \$20 per person, per hour, for 4 hours, or about \$800) and then report that figure as non-federal match.

**Q:** Does DEQ have a specific rate for calculating the value of volunteer labor (e.g., for calculating in-kind match from volunteer participation)?

**A:** No. The rule of thumb we recommend is to use an estimate what it would cost to go out and hire someone (salary + benefits) to do the same work.