



2025 Nonpoint Source and Wetlands Pollution Reduction Applications

DRAFT Phase NPSW Feedback

Project: The EcosySTEM Project – Community Outreach and Education in the Clarkfork and Yellowstone

Applicant: Ripple CEES Montana Tech

General Comments:

- Responses are dense blocks of text. Improve readability by breaking into that respond to each component of the question.
 - Funding would not be available until fall 2025 – timeline shows summer academy starting June 2025, is that timeframe workable?
 - Is the summer academy a new or existing program?
 - Training teachers in PSA development seems kind of out of place if the goal is actually to get teachers to integrate NPS pollution science into their classroom lessons?
 - Budget shows Communication support/PSA production/print/social media line item of 150 staff hours – can you provide more details or how that will be used?
 - It would be great to coordinate on messaging for PSA development. Describe the type – would it be for TV, radio?
 - It is unclear how you will monitor their effectiveness at influencing behavior change. I like the student pledges and info that could be gleaned there, but the application seems to speak to a different type of data collection.
 - Good information and explanation on page 6 about what and how you plan to evaluate. Include some of this in behavioral change question on page 4.
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Project: Central Clark Fork WRP Development

Applicant: Clark Fork Coalition

General Comments:

- Identify match source in budget table.
 - Applicant has not indicated that they will meet the non-federal match requirement.
 - 9 HUC10 watersheds – this is a lot! Can you explain why these nine were selected, and why a more focused approach is not the next best step.
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Project: Grant Creek Restoration

Applicant: Clark Fork Coalition

General Comments:

- On the project partners page and budget sheet, please clarify if landowner contributions are cash or based on land value.
 - Will a wetland/conservation easement be part of this project? If not why?
 - I like the wetland creation component
 - Application mentions pre project BEHI only. Pre Project and Post project BEHI should take place.
 - The project site is on the downstream end of the watershed. DEQ typically encourages groups to restore upper reaches of a stream before addressing lower reaches. Working from upstream to downstream helps prevent scenarios where upstream degradation inhibits the success of downstream restoration. It also tends to encourage restoration efforts that focus on the root causes of nonpoint source pollution instead of treating the symptoms. Please explain why it would be better to work in the opposite direction on Grant Creek.
 - In the design typical for vegetated matrices, very little of the willow cuttings appear to be buried deep enough to maintain contact with groundwater during baseflow conditions. Consider burying them deeper so at least 1/3 of the cutting is buried lower than the baseflow water surface.
 - The design typical call for willow cuttings that are between ¼ and 1 inch in diameter. Please consider increasing the required diameter to between ½ and 1 inch. This may help improve survival rate.
 - Please specify that the willow cuttings must be locally sourced from within the Missoula valley.
 - In Project Implementation response, explain the goal of wetland creation. The wetlands in designs are open water ponds. They could be great wildlife habitat but would not be considered wetlands from a mitigation standpoint. Emergent wetlands would better treat pollution.
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Project: Upper O'Brien Creek Stream Restoration Implementation

Applicant: Clark Fork Coalition- Adam Switalski

General Comments:

- Application states that impairments include sediment / siltation and alteration in stream-side vegetative cover due to a legacy of forestry and road construction. Do not see Obrien

creek in 2020 impairment listings. App should clarify they are suspected impairments and that the stream is listed as concern in WRP.

- The application states that pre-project BEHI will be completed before the project begins on restoration treatment sites. Should have post BEHI as well which will estimate the sediment load reductions (tons/year) achieved through implementation of the proposed restoration activities and management practices.
 - No private landowner LOC (2025/2026 task)
 - Check mark on required attachments for providing the WRP support letter
 - I like the wetland creation component although have concerns about how close it is to the road. The unnamed trib that will feed it was part of the fire? How much water from the unnamed trib will be diverted? How will you ensure it doesn't get filled with sediment?
 - Photos are helpful. Would be interpreted better if the Site number was given for each photo.
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Project: Evergreen Water and Sewer District Education and Outreach Project

Applicant: Flathead County Water and Sewer District No 1. Evergreen

General Comments:

- Additional Info response on page 6 is too long and gets cut off by the box. Shorten response.
- Be wary of including information extraneous to the EO project. For example, in Additional Info – page 6 – you say in Evergreen there is shallow groundwater, high density septic and close proximity to surface water. All factors that imply replacing septic is an unsustainable next step. Be prepared to justify that if you include it in the app (but I don't think it's relevant to EO).
- Curious how their mobile exhibit compares to the Rolling Rivers trailer or the septic model that NSPW has developed. \$25k just feels expensive. It is a huge portion of their budget and very little detail was provided to explain what they'd like to build. Groundwater models exist and can be used to demonstrate septic impacts.
- Water and soil sampling will require a Sampling and Analysis Plan and would need to be tied to the replacement project. Be sure to detail in the budget.
- What is the match source? Document on budget.
- Even though you go into more detail further down in the application, at least mention the behavior change you are looking to address in your project description.
- How did you identify and come to the consensus on your identified barriers to behavior change?
- Consider how you could really assess the extent of behavior change you are looking to address
- What would be some measurable goals and outcomes from this effort?

- Funding comes available in October 2025, so consider how that impacts your draft anticipated timeline.
 - Unclear on what kinds of educational material you are going to be using or creating to increase awareness. Please be more specific.
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Project: Evergreen Septic Tank Replacement

Applicant: Evergreen Water & Sewer District

General Comments:

- 1337 pages? Consider which attachments are truly necessary for reviewers to understand the project.
- No WRP letter
- Sampling and analysis plan required for soil and water testing. What water will be tested?
- In project implementation task description, explain why septic system replacement is the next best step, despite shallow groundwater and near surface water. (e.g. emphasize how cinder block septic tanks are significantly worse than traditional)
- ID the match source in the budget table. OSG should be listed as “other funding” source (it is federal).
- Is this truly a \$500,000 project? Between the school, Cynthia Drive, and Shady Lane? The budget table should capture total project costs. Alternatively, the project implementation task description on page 11 should reflect what is captured by the budget.
- What measurable and clearly defined goals can you clarify as part of this project?
- While septic tank replacement is important, a goal of NPSW funding is to restore natural stream, lake, and wetland processes. What can you incorporate or describe in your application that might help achieve this?
- Project effectiveness should also consider some time bound criteria and goals
- I encourage you to dig deeper into how to address and track community engagement further than participation logs and surveys
- How will you ensure the long-term protection of this effort – who will fund the schools’ septic maintenance? How to ensure funding for future maintenance?
- Why is the replacement of so many systems the best option compared to the most WQ protective option (a centralized system).
- Please include notes in the additional information on what the funds would actually go towards and identify other funding sources that are in the works (secured or not).
- What types of outreach/publications are you going to be using or developing?

Project: Flathead Lake Buffer & Retention Pond

Applicant: Flathead Lakers

General Comments:

- Biostation providing WQ monitoring and analysis. E coli, nutrient, and TSS sampling will require a SAP and upload to WQ Data Portal
- Is there a known E coli issue at the park and golf course? What actions are being taken to reduce pollution at the source, before the buffer?
- On page 5 of the application, under “Project Purpose”, you indicate that your project will address nitrogen, phosphorus, mercury and PCBs. If your project will be addressing each of these impairment causes, please explain elsewhere in the application how the project will address each of these impairment causes.
- On Page 12, please be more specific in which education and outreach activities you will engage in. For example, how many workshops will you sponsor, how many tours will you hold, what volunteer activities will you support, and who will be your target audience(s)? Such a well used park holds many EO opportunities
- Please make sure the Project Timeline accurately reflects the duration of activities described in the task descriptions elsewhere within the application.
- The proposed buffer width is 10-20 feet wide. DEQ’s design standards, found on page 7 of the Call for Applications, require a minimum 35 foot buffer, 35 feet is the minimum buffer width for effectively filtering out stormwater related pollutants.
- Great to see the engagement and participation from CSKT on the design, permitting assistance, native plant selection ,and E&O. How can the collaboration from this project help future work with CSKT?
- Try to be more concise in your description of the EJ section as it cuts off the last paragraph!

Project: Big Sky Water Conservation Program – Marketing Campaign

Applicant: Gallatin River Task Force

General Comments:

- Suggest submitting as an E&O project (with a CBSM approach) instead of capacity building project.
- Clarify when you plan to hire contractor to start the CBSM research steps. Is it before the grant begins? If so, clarify what steps of CBSM will the grant cover in terms of contractor costs. If grant is intended to cover contractor starting the CBSM research steps, suggest doing that first, in advance of launching a new communications and marketing campaign.
- State match source on budget sheet. Did you mean for District Fees to be some NF Match some Other?

- Budget sheet – Project Planning contractor fees shown as 319 \$, but show match source.
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Project: South Fork Moose Tracks Stream Restoration Project

Applicant: Gallatin River Task Force

General Comments:

- Letters of support were not included in application. LOS demonstrate community commitment and the projects potential for success.
 - Check mark and provide all required attachments (landowner LOS)
 - Pre- and post-construction water quality data collection will require a Sampling and Analysis Plan.
 - Thank you for providing extra match.
 - Clarify how the proposed solution in the Project Implementation Task response addresses the root causes of the problem (e.g. upland and bank erosion, vegetation removal, roads, resort development, recreation). Part of this clarification should include discussion about the resort is doing to address these root causes. Otherwise, why put in this project if pollutants are still entering from above?
 - Please describe education and outreach activities with measurable outcomes that will target landowners (e.g. tours, public meetings, social media post, press release).
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Project: Education and Outreach in the Lolo Watershed

Applicant: Lolo Watershed Group

General Comments:

- Project name is E&O but on page 2 the type of project marked is Capacity Building. Seems to fit more in Capacity Building – if so, don't need to fill in the answer boxes for E&O project on page 4. Suggest moving some of content to Capacity answer boxes on page 3 and additional info box on page 6.
- In Activity Description you say “develop workplan, funding strategy and potentially apply for grants” but then budget says “develop workplan and apply for grants”. Is it potentially or definitely? Clarify if the consultant will be developing a workplan for your organization or a workplan for the staff person that your board intends to hire.
- Contract may not be available until Oct 2025; will that be a problem?
- DEQ has previously funded a Lolo speaker series through the EO minigrant program. Sell to reviewers why we should fund it again. How many have you hosted in the past? What was turnout like? What is your end goal for the participants? What are the range of topics (because we can only fund NPS topics)

- When discussing LWG capacity issues (in “Need and Opportunity” section) acknowledge the role other watershed groups have played and LWG’s role and relationship to them. Have there been/are there opportunities for LWG’s board to influence the role of, for example, CFC’s project manager working in Lolo? It seems you could clarify roles (ie that CFC’s role has been to partner with the USFS, LWG’s goal is to facilitate private landowner projects?) What is the impetus for a watershed group specific to Lolo—do landowners comprise the board?
 - The 2nd and 3rd paragraphs in your behavioral change response are about capacity, that discussion belongs in the “Need and Opportunity” response
 - This comment was if the project would be evaluated as an E&O project, rather than capacity building. (If submitting as capacity building, may not apply.) The behavior change goal you have for this project is “better practices at home with lawns and properties.” Don’t make this a “Hopefully”. Flesh out how your speaker series reduces barriers and promotes benefits of adopting these behaviors. “Better practices” is also vague. Be specific about the lawn and property maintenance behaviors you are going to promote.
 - I recommend selling in your app also the behavior change you will promote through the road and fishing day speaker series
 - Budget – facility rental only for 4 events, timeline says one speaker per quarter for 2 years (so maybe should be 8?)
 - Unclear if the NPS social media post costs and event follow-up survey items were intended as volunteer match or to use grant dollars to pay someone?
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Project: Rolling Rivers Mini-Grant Program

Applicant: Montana Association of Conservation Districts (MACD)

General Comments:

- Insufficient match
- DEQ and MACD have an existing agreement that funds maintenance of Cascade, Richland and L&C CD trailers (\$4,000 in this task). Please justify how \$25k to fund maintenance of the other four CD’s trailers is justified.
- How is this program different than if a CD applied for a MACD E&O mini grant? (also funded via 319)
- What goals for this work have you identified?
- With DEQ placing an emphasis on E&O and behavior change methods, how does this application fit into those priorities?
- Identifying and support from project partners and CDs would help justify this ask help the panel understand why this funding is needed outside of the existing MACD E&O grant or existing agreement with DEQ to fund trailer maintenance.

- How did you come to the 25K for the mini grants? What types of supplies for maintenance and costs?
 - How will this effort be sustainable over time?
 - This may be a better fit into the existing MACD E&O mini grant if CDs were to apply for rehabilitation of the trailers to ensure the continuation of education resources rather than a focus on maintenance
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Project: Ranching for Rivers

Applicant: Montana Association of Conservation Districts (MACD)

General Comments:

- Project area states this is a statewide grant program. Funding must either implement an accepted WRP or demonstrate how the project is reaching an underserved market.
 - Insufficient match
 - In implementation task description, you need to better sell the R4R program. Not all review panel members are familiar with it. How much funding was available and distributed last year? How many miles of stream did that improve? What landowner benefits have been documented? Does this funding request cover 1 year?
 - I like the change in direction to empower the CDs
 - For project effectiveness monitoring – with this program going on for a while, you should be able to anticipate what most of your projects will likely need and a general outline of what would be expected for monitoring. In addition to fine-tuning for each individual project.
 - In your description of the program - mention some of the main evaluation criteria – what is valued as part of this program? What are some of the main goals and how do they get at the root cause of NPS pollution and restore natural processes?
 - Mention that each project also has a long-term maintenance agreement to ensure the sustainability of the effort.
 - Consider also including post project tours or other community engagement methods as part of your E&O efforts to lead towards specific behavior change
 - Really support the idea of reaching out individually to the landowners on what they would want more technical training on
 - Can you justify your ask of 120K for project implementation? Do you have landowners/CDs and projects lined up that you anticipate being a good fit for this program? How do past years demonstrate that you can meet that expectation?
 - Clarify that MACD will be doing statewide outreach for projects in addition to the outreach with CDs for project applications
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Project: WQ Education and Outreach Mini- Grant Program

Applicant: Montana Association of Conservation Districts (MACD)

General Comments:

- Call directly states no statewide EO programs. EO projects must implement a WRP or demonstrate they are reaching an underserved market (if not implementing a WRP, there is a risk that EPA will not accept that EO mini grant).
 - No project partners? (what about CDs, Watershed groups, MWCC, DNRC, DEQ?)
 - In implementation task description, you need to better sell the miniG program. Not all review panel members are familiar with it. How much funding was available and distributed last year? How many and what EO projects did it fund? What behavior change resulted? Spend more time explaining mini-grant program and accomplishments and serving important need for smaller, more nimble projects with partners. Since application form doesn't really address mini-grant applications, try to put bulk of explanation in Implementation Task. Explain that other tasks in application form are not really applicable for mini-grant project.
 - Insufficient match. For requested amount, minimum \$75,159 NF match required
 - Clarify that intent is for 2 rounds of E&O mini-grants – Spring 2026 and Spring 2027.
 - Not sure offering MACD grant webinars in the Education/Training section strengthens application.
 - Add more explanation to answer boxes – some of current answers are pretty brief.
 - Use Project Effectiveness box to discuss more about individual mini-grant pre/post assessments, and also the project effectiveness survey/evaluation tool that MACD will do to understand how individual funded activities contributed to further engagement or led to implementation of additional education, outreach, projects, etc (see scope of work language in current FY 2022 grant).
 - Page 4 – Connection to previous grant. List current grant (ie FY 2022 Education and Outreach mini-grant program \$64,400), explain it was intended to offer two rounds of funding (2023 and 2024), was able to utilize leftover funds from previous FY 2021 mini-grant award to stretch dollars and offer 3rd round of funding in 2025. Explain MACD hasn't applied for mini-grant funding since FY 2022. MACD typically applied annually for E&O mini-grant funding since 2010. FY 2022 was first year of applying for more than one year (more efficient for contracting and reporting). With the requested FY 2025 funding, MACD will again be able to offer at least two rounds of funding (2026 and 2027).
 - Budget: suggest rounding numbers to whole dollar amounts.
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Project: Big Hole Watershed Non-point Source Reduction and Floodplain Connectivity

Applicant: Montana Conservation Corps

General Comments:

- Are the proposed projects on private or public lands?
 - Be sure to describe how projects are addressing identified impaired waterways
 - Pg 8 of app form - A landowner agreement will be required and be sure to indicate if that will be completed prior or after if contract is awarded. Grazing plans will need to be incorporated into the plans where cattle are going to be present/excluded from waterways
 - What are the long term maintenance needs and plan for funding to ensure project longevity and success?
 - What lessons have you learned with your previous LTPBR work and how are you incorporating it into this project?
 - How were these projects picked? What was the criteria and what made these rise to make the priority list? (for both BHWC and the Forest Service)
 - It is unclear why 3 interns and 2 BSWC members are needed for this project/50 BDAs. Why can't the BSWC members take on the work of the intern? 319 funds already support cost share for BSWC members through a grant with MWCC. How is this different or why should they be funded here and not that program?
 - Be clearer in your project implementation description on how many projects you are doing. 3 BDA and livestock fencing projects, 1 just fencing?
 - What are the root causes of the issues you are looking to fix? If the root cause issue is grazing related, where is the funding request to implement grazing BMPs?
 - What would be an alternative plan if unable to award the full 250K ask?
 - What goals do you have for this overall effort? How will you evaluate success?
 - What funding does MCC typically use to support crew work and why apply to DEQ 319 funding for this work?
 - BSWC cost share line item is more expensive than positions we fund through BSWC program
 - Need to define match source and if match is secured on budget. Where is the "other funding" coming from?
 - Put captions on pictures at the end – where are these and what would be the anticipated project?
 - Project effectiveness task response is vague and way too expensive. See example contract language below the response box, and example threshold value above response box.
 - \$220,580 for 50 BDA structures is exorbitant
 - No EO component. How will you raise awareness about this project and generate interest in additional work?
 - Elk Creek and Lower Meadow LTPBR map implies you'll be directing road run off directly into the stream. Please clarify this aspect of your project.
 - Trail Creek and Hogan Meadow LTPBR shows side channel activation and sod plugging. Please clarify this aspect of your project in the application.
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Project: Bangtail Creek Restoration Project

Applicant: MT Freshwater Partners

General Comments:

- Overall, more detail will strengthen this application.
 - Add project extent to DEQ StoryMap at the link provided.
 - Letter of support from landowner are required for final phase of application. Project partner land landowner letters can be a source of understanding whether “the project includes appropriate levels of landowner and partner involvement”, and whether “potentially applicable permitting entities been identified and consulted” scoring elements. Ideally, the landowner/manager will describe their intended contributions to the project in their letters, and you can also describe as thoroughly as you can in the “Contributions to Project” column of the Project Partners section of the final application. Confluence Consulting the “technical” author of WRP, but hired by CD/watershed group (right?) so letter from them also needed.
 - Proposed project effectiveness monitoring is neither time-bound nor descriptive of what would quantitatively trigger adaptive management as written. Tie to causes of impairment you listed on Page 5.
 - Review project timeline - Implementation cannot begin without signed landowner agreements, permits and DEQ-approved final designs, pre-project monitoring (BEHI, etc.) should happen before implementation.
 - Review in-kind match of time in budget. I think ranch manager/landowner hourly rates could be higher, but estimates of their time spent on some tasks might be high.
 - Confluence Consulting wrote the WRP on behalf of the Shields Valley Watershed Group. Please obtain a letter of support from the Shields Valley Watershed Group in order to satisfy the WRP author letter of support requirement.
 - In the Project Partners section, if Tim Niccum is the ranch manager for the Hayhook Ranch, please combine “Hayhook Ranch” and “Ranch Manager – Tim Niccum” into a single entity.
 - In the Project Implementation Task, your response to the question must be contained within the space provided. Appendix A of the 2025 Call for Applications contains the following instructions: ***Space for answering application questions is deliberately limited. Do not change font size to include more information. Do not type “see attached document” into the answer boxes and then attach a separate document with longer answers.***
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Project: Shields Capacity

Applicant: Montana Freshwater Partners

General Comments:

- Proposal includes several appropriate next steps to addressing NPS pollution.
 - Project goals are fairly well-defined and measurable, but consider making identification of the barriers to participation in NPS reduction projects a goal of your landowner outreach efforts.
 - While letters of support are not required, a letter from FWP that explains how the use of these funds for YCT work will streamline or otherwise be beneficial to permitting NPS projects.
 - NPSW staff is interested in better understanding the fisheries data gap. What permit specifically is impacted by this data gap? Why is gathering the fisheries data the only/best way around this permitting limitation?
 - Rather than collect fisheries data on streams, could a component of this be gathering research to justify certain practices (e.g., BDAs do not necessarily benefit brook trout)?
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Project: Blacktail Creek Restoration Project

Applicant: State of Montana, Department of Justice, Natural Resource Damage Program

General Comments:

- You have indicated that your organization does not have adequate liability insurance for the risks associated with your project. If your project ultimately receives funding, you will need to demonstrate that you have adequate liability insurance.
- On page 4 of the application, you appear to have provided the DEQ Assessment Unit ID number instead of providing the 12-digit HUC number as requested.
- Blacktail Creek is not on the current list of impaired waters. Please focus on tying the project benefits to nonpoint source reductions in Silver Bow Creek.
- 319 funding typically can't be used to fund projects that are focused on infrastructure protection. Consider focusing on the need to prevent the headcut from moving upstream where it will have a severely negative impact on currently healthy stream morphology and riparian and instream habitat.
- In your education and outreach task, you reference RIPPLE as a partner, but they are not identified in the Project Partners section and it's unclear whether you have reached out to them.
- In your education and outreach task, consider narrowing your focus to hone in on specific audiences using specific education and outreach tools.
- It's unclear whether the budget you provided includes the costs associated with the BCC Pond component, which in previous conversations with DEQ was determined to be part of the stormwater infrastructure covered under Butte's MS4 discharge permit and therefore not eligible for 319 funding or to be used as match funding for a 319 grant. Please review the budget, maps and other application documents to ensure you are only referencing the

stream grade stabilization project, and not anything that might be tied to the BCC Pond component.

- Please consider increasing your willow stake planting density.
 - Willow stakes should be installed with at least 1/3 to 2/3 of their length buried **below the low water level** to ensure sufficient moisture for spontaneous rooting.
 - State match source on budget table. Is \$150,000 Future Fisheries, or the \$30,000? Other Funding should be funding going towards the project that cannot be counted as NF match (such as federal funding or other NF match that is already matching other grants).
 - The 319 grant program focuses on nonpoint source pollution prevention through restoration of natural processes. The proposed grade control structure does not restore natural processes.
 - DEQ strongly encourages 319 grant applicants to focus on the root causes of nonpoint source pollution. What is the root cause of this headcut and associated sediment pollution (straightening from the golf course?). How does your proposed solution address this root cause (can the project footprint be expanded to aggrade and re-meander the stream)?
 - Include photos of existing headcut. The footprint of headcut treatment is small. Are there opportunities for more comprehensive stream restoration?
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Project: Brackett Creek Restoration and Erosion Reduction

Applicant: Trout Unlimited

General Comments:

- Make sure to provide and check mark all required attachments
- Love the in stream flow lease component
- Landowner funding not identified in budget table (indicated on application form)
- If project is shovel ready in October 2025, will the project planning deliverables ID'ed in budget table already be complete? If so, cannot count activities that occur before contract signature as match.
- Will the timber bridge be replaced? Designs say removed. Or is the bridge to be removed the one associated with the road?
- Edge of farmed field indicated in designs abuts eroding banks. Is the landowner willing to establish a larger buffer?

- Sediment monitoring is well-written as time-bound and quantifiable! You can include repeat photos/drone flights or other methods for veg monitoring and use survival rates for triggers for adaptive management.
 - Like the direct connection to the WRP sediment ranking.
 - Would be good to make a component of E&O go beyond raising awareness and attempt to understand the barriers (trust? money? something else?) to behavior change (i.e. doing projects) in the watershed.
 - More detail needed in the budget. Match sources, even if not secured, help with review in gauging partner commitment. Also, project planning tasks and landowner agreements that are already done can't be used in the contract.
 - Nice to see landowner letter saying they will contribute cash to the project! Maybe get one that is addressed to 319 with more details on commitment.
 - Looks like all or part of project is in a FEMA mapped floodplain. Suggest discussing with county floodplain administrator to understand potential floodplain permit logistics and cost.
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Project: Canyon Creek Stream Restoration and Monitoring

Applicant: Trout Unlimited

General Comments:

- Did not check mark all required attachments: Landowner (but did provide) and WSG?
 - Love the in stream flow lease component
 - Project Implementation description – describe root cause of the nonpoint source pollution issue and how your project addresses this.
 - Monitoring is focused on floodplain connectivity, fish/habitat and BEHI. All good, but budget?
 - EO is “mold breaking” but what *are* the deliverables? Non-targeted audience, lacking CBSM.
 - What is the plan for the culverts? Describe in implementation task. This uncertainty was part of the deal-breaker for the application last year.
 - Inexpensive, good project, although I'm not convinced the beaver aren't doing a fine job themselves.
 - Budget does not show landowner funding as indicated on application form
 - Monitoring needs to be time-bound and address triggers for adaptive management.
 - Upper reaches (3, 4,5) bank is against an eroding hillside – discuss how LTPBR will be designed to interact with this.
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Project: Trout Unlimited Shields Watershed Capacity

Applicant: Trout Unlimited

General Comments:

- What is NF match source? ID in budget
 - I think your application sufficiently addresses why groups in the Shields should receive capacity funding, but consider the questions “why should TU receive capacity funding and not X Shields local organization?” and “why can’t existing funding resources be used to support TU staff” with responses in your application
 - Identifying high quality projects is a great way to utilize funds. Keep in mind that many of the potential fund uses mentioned in the application (monitoring and surveying) would require a sampling and analysis plan. Is SAP development in the budget?
 - Try to reframe line items in budget to reflect deliverables that have a tie to NPS pollution reduction and a future on the ground project.
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Project: E Fork Cherry Creek Restoration

Applicant: Trout Unlimited

General Comments:

- The root causes of the nonpoint source pollution problem are accurately identified, and project should address these and restore natural stream processes
 - NPS goals need to be defined in a measurable way.
 - Wildlife grazing could be a barrier to establishment in a 2-3 year period. Adaptive management should be included in landowner agreement.
 - Proposed evaluation metrics for E&O success involve measuring attendance/awareness rather than identifying barriers to future similar projects.
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Project: Joe Brooks TU Cottonwood Planting and Fencing

Applicant: Trout Unlimited, Ashley Brubaker

General Comments:

- Check mark and attach all required attachments
 - You must have a letter of support from the author of the watershed restoration plan, or a reasonable explanation as to why you were unable to obtain one.
 - You must include a letter of support from the landowner.
- If JBTU will be taking a lead role on the project, why are they not the applicant?

- If JBTU is going to take a lead role on the project, but they won't be the applicant, they at least need to provide a letter of support.
 - In the Project Implementation task, please quantify the amount of work you intend to do. This could be done in terms of minimum feet of fence, number of trees planted, number of acres of cottonwood gallery protected, number of whips harvested, or number of sites addressed.
 - Clarify if all plantings will be from nursery grow out, or are some also simple cutting transplants? Justify the need for nursery grow out.
 - In the Education, Outreach and Training task, please flesh out some of the details. How many volunteer days will you have? How many volunteers will you hope to reach? How will you find and engage with volunteers? How many blog posts and newsletter articles will you generate? Are there specific groups within the watershed that could be especially helpful? What are the barriers to folks volunteering? What do you hope volunteers will take away from your education and outreach activities?
 - Budget – Please add more specific details in the body of the application to justify the costs described in the budget template. What permits are required for cottonwood planting? State NF match source on budget sheet.
 - Project Effectiveness Monitoring Task description – Vague. See description examples of thresholds and example task language. Would be more competitive to include survival and browse thresholds for adaptive management
 - Additional monitoring – fish?
 - The USFS just completed a Watershed Condition Framework Watershed Restoration Action Plan. Why did this work not get implemented under that effort? If fencing is required to protect plantings from livestock grazing, and grazing is identified as a root cause of impairment, what has/will be done to address this?
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Project: NF Spanish Creek & Wetland Restoration

Applicant: Trout Unlimited

General Comments:

- Please fix the project location so reviewers can easily find the project site.
- Maybe be more specific in monitoring for what effect the restoration will have. i.e. estimating sediment retention, there are methods to estimate sediment reduction not requiring WQ sampling. Also having monitoring parameters to inform adaptive management will bolster this section.
- I like the additional monitoring of increased flow and changes in GW.
- Can you clarify if ditches are drains or supplies? If they are supply lines, will filling them help restore wetlands?

- E&O – section is a little weak. Providing tours to interested parties to me means they need to approach you. I think be proactive and plan these tours and target neighbors. I do like the video idea, thinking a little about an effective distribution plan and how to measure impact could be beneficial.
 - Consider moving staff time under implementation task into planning task.
 - Please add/quantify specific deliverables for the Education, Outreach and Training task.
 - Love the instream flow lease component
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Project: Rowton Bank Stream Restoration

Applicant: Winnett ACES

General Comments:

- Under the FY2025 319 Grant Call For Applications, it appears unlikely that the Lower Musselshell project would meet the eligibility requirements, and if deemed eligible, it would likely not score well enough to obtain funding. DEQ has the following concerns with respect to funding this project under the current Call for Applications.
 - Eligibility: The FY2025 Call for Applications states that “All projects must reduce or prevent nonpoint source pollution by restoring and protecting natural processes and conditions”. The Musselshell River is actively migrating in response to channel straightening that occurred as a result of unusual, but natural flooding. The proposed project would attempt to prevent natural channel migration that needs to occur in order to support natural channel and habitat formation processes.
 - Feasibility/Sustainability Concerns: When staff visited the project site on 3/3/2025, floodwaters had receded considerably (landowner estimated they had gone down 5 vertical feet in the last few days), but flows were still roughly 2400 CFS (based on Mosby USGS gauge station data). Large pieces of the bank were actively calving into the River as a result of streambank undercutting and sheering from high water. Full-grown cottonwood trees had been uprooted by recent floodwaters and deposited on the eastern streambank. The Musselshell is a really big river once it gets down by Mosby, with a lot of power, very tall cutbanks, highly erosive soils, and extreme annual fluctuations in flow. During the site visit and subsequent discussion(s) with the project sponsors, DEQ staff learned that further engineering work or hydraulic analysis would not be undertaken. Instead, implementation would be guided by a FWP Fisheries Biologist who would be onsite during construction. It is unknown at this point which excavation company will be hired to do the installation, and whether they will have experience with the proposed treatment technique. There are also some unknowns with respect to a shale layer that appears to underlay part of the project area, which could affect the stability of the floodplain bench and the ability to get woody vegetation established in some areas. The willow planting called

for in the PER will likely be postponed for a later time. Given the complexity of the project site and the uncertainties associated with the project design, DEQ staff have significant concerns over whether the project will be successful if implemented as planned. It's likely that the Agency Review Panel would have similar concerns.

- Recommendation: DEQ staff are conscious of the tremendous amount of work that goes into garnering the support of a landowner, working through permitting issues and design constraints and trying to find funding for construction. However, it is our opinion that this particular project may not be an appropriate fit for 319 grant funding.