2026 Nonpoint Source Pollution Reduction Applications

DRAFT Phase Application Feedback

General Comments for All Applicants:

- Observe the 20-page limit for optional attachments
- Ensure that for tasks marked complete prior to contract for the coordination/planning and landowner agreement tasks on the application form, you are not then requesting grant or match funding to complete those tasks on the budget form
- Project effectiveness task description on application form needs to include success criteria and adaptive management thresholds.
- Education and outreach efforts associated with on-the-ground projects should generally always have the metric of generating additional project interest or improved land management.
- Ensure you have input your project information to this website.

Project: Cottonwood Creek Restoration Project Phase 1

Applicant: Big Blackfoot Chapter of Trout Unlimited

General Comments:

- In the final application, rather than an emailed statement of support, please provide a more detailed letter of support from the landowner.
- Please describe the stream conditions that would exist at this site under natural conditions and how the proposed design works towards restoring those conditions.
- Please provide details regarding the intended riparian buffer, including the approximate location/width, to what extent it will be grazed, and how it will be revegetated.
- The current design includes placement of large woody debris, but the design does not appear to include planting of vegetation capable of sustaining large woody debris production.
- Stated that Mannix have already developed the grazing management plan. Consider including it as an attachment or at least excerpting key changes from previous grazing practices through each phase of the project including post-project.
- Good cost-effective project with great match.

Project: Pattee Creek Riparian Revegetation Project

Applicant: City of Missoula

General Comments:

- In your final application, observe the 20-page limit for optional attachments
- Please note the following minimum design standard from page 7 of the Call for Applications: "Projects involving riparian or wetland buffer creation must have a minimum buffer width of 35 feet, as measured from the ordinary high-water mark. If the buffer must be less than 35 feet in some places to accommodate bridges, water gaps or other infrastructure, the buffer should be made proportionately wider in other areas." Please eliminate the parcels identified on the map and quantified in narrative that will not be able to meet this buffer width.
- Project effectiveness monitoring will need to include DEQ's methods provided in example task language: vegetation mortality monitoring, pre- and post-construction photos.
- If you don't know which landowners you'll be working with yet, how do you know the 6 proposed sites will measure project effectiveness? We can only fund monitoring that evaluates project effectiveness. Your monitoring sites appear to bracket stormwater infrastructure, and nonpoint source funding cannot be used for monitoring required to implement a permit. Your budget does not contain a line item to implement the proposed monitoring plan. Is this captured by WEN $4976? Please clarify the intent of this component.
- Landowner agreements will be required for this project. Please incorporate into budget.
- Application form implies all planning will be complete prior to the contract, but your budget claims $2,370 in match. Please correct either the application form or the budget.
- What are plant handouts? How is this different from "plants" under implementation? How will you ensure "plant handouts" benefit water quality?
- Please include "afters" with the before photos of previous landowner you have work with to sell the effectiveness of your proposal.

Project: Lower Grant Creek Phase 2

Applicant: Clark Fork Coalition

General Comments:

- Have you reached out to NRCS to inquire about their new regenerative grazing pilot program? They may be able to cover portions of your budget.
- The Phase 1 design plans provided are old and do not reflect final design plans. In addition, please remove sheets from design plans that don't have to do with the current proposal. For Reach 4 figures please annotate what will be completed in Phase 1 vs Phase 2, since Reach 4 is included in both phases.
- Phase 1 of Grant Creek was awarded $130,000 with $20,000 of that going to planning and design. Design costs for Phase 2 seems high given much planning has already gone into this part of the project. Justify this expense. Draft design plans are marked as completed on application form but requesting $20k in budget.
- Panelists will wonder why you are coming back in for funding. Explain how last year's successful application led you to this proposal. What specific lessons were learned on Phase 1 and how have these design/plans been adapted?
- Admin cannot exceed $12,000 or 10% of total funding request.
- Please ensure project follows the minimum design standard from page 7 of the Call for Applications: "Projects involving riparian or wetland buffer creation must have a minimum buffer width of 35 feet, as measured from the ordinary high-water mark. If the buffer must be less than 35 feet in some places to accommodate bridges, water gaps or other infrastructure, the buffer should be made proportionately wider in other areas."

Project: Flathead Watershed Restoration Capacity Building

Applicant: Flathead Lakers

General Comments:

- Application needs more clarity about why this capacity building proposal is not redundant with efforts conducted during watershed restoration plan development. For the budget requested and activities proposed, I would expect an updated Watershed Restoration Plan as an outcome.
- ~10% of budget request is to support volunteer recruitment and events, but no project implementation is planned under this proposal. What will the volunteers be doing, and are 50-100 really necessary if projects have not yet ramped up?

- Timeframe of one year seems short to accomplish goals. Partner coordination, screening, project identification tasks seem doable, unclear that actual restoration projects using volunteer time to implement the projects could also occur.
- Provide more clarification in budget to explain specific line items (in Additional Information column)
- Are stewardship events intended to be volunteers helping with restoration projects? Align project narrative with language on budget form.

Project: Gallatin Stream Team

Applicant: Gallatin Watershed Council

General Comments:

- The activity description (pg 2) says data is "directly relevant to identifying and understanding nonpoint source (NPS) pollution impacts". Why is recruiting more stream team volunteers an appropriate next step for reducing nonpoint source pollution? The vision for capacity building funding is that it results in on-the-ground projects. How will your proposal do this? Here and/or in Need and Opportunity (pg 3) explain how this data will be useful to and how it will ultimately improve local capacity to develop and implement on-the-ground projects to prevent/reduce these impacts.
- Is this source of data likely to go away without this funding? Consider additional metrics in Measurement and Sustainability (pg 3) that capture amount of credible data being provided for impairment decisions, source assessment, evaluation of the Focus Watershed effort, etc. Include emphasis on the value of volunteers in this work.
- Line 16 of budget table – provide additional detail on the calculation of match sum and 319 ask. What is "maintain volunteer resources"? Other metrics under Effectiveness Monitoring? The easier this table is to understand, the better.
- It is our understanding that the monitoring site at the mouth of Camp Creek may be threatened. Losing that site would be a huge loss for measuring the effectiveness of the Camp/Godfrey NWQI/Focus Watershed effort. Tell THAT story (validated from GLWQD) as it relates directly to nonpoint source project effectiveness monitoring, and may enable a leg up in the Focus Watershed funding pool (although this proposal could not wholly be considered that way).

- 144 hours seems like a lot to host training and appreciation events. “Recruit, coordinate, and manage volunteers” shows up twice, unclear why. Clarify if the BSWC member’s workplan will solely be focused on Stream Team to help justify the cost for “Program oversight for BSWC”. Overall, the funding request is high when considering the bulk of the work is intended to support *volunteer* monitoring. Justification/clarity for each line item, and ideally reducing the cost, will improve your proposal.

Project: West Fork Madison Side Channel

Applicant: Trout Unlimited

General Comments:

- Why is a grazing management plan involved? Remove from budget and planning task check list, or include in project narrative description of this root cause and how the project will address
- I like the inclusion of human fencing to address this root cause of the problem. It seems vehicle rut decompaction will be required to ensure vegetation success and to eliminate a flow pathway. Include, or explain why this is not necessary.
- Great match, but this is an expensive project for its footprint. Anything to lower costs will benefit your score.
- Has the side channel been monitored to see if it is used as a rearing area or for refuge during high flows? If so how has this informed restoration treatment?

Project: Hyde Ranch Fencing and Riparian Enhancement Phase 1

Applicant: Trout Unlimited

General Comments:

- If possible, provide a map showing the location of proposed fencing, water gaps, riparian plantings and stock tanks.
- Please note the minimum buffer width requirement in DEQ’s minimum design standards in the Call for Applications.

- Please clarify if the intent of the project to treat the spring-fed ditches as streams? If ditches have continual flow from springs, they may be an important cold water source to Rey Creek. Will eventually building a wetland between the ditches and Rey Creek negate some of their temperature benefit?
- Have you looked into NRCS wetland enhancement programs as a possible means of creating wetlands to help address some of the sediment loading from the spring-fed ditches?
- Provide more specific details (quantities) in your education and outreach task.
- Consider adding cottonwood plantings, especially along the Madison River.
- Will the livestock fencing be exclusion fencing, or are you proposing to create riparian pastures?
- Please clarify how many additional phases of work are anticipated to be required for this landowner

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Project: East Fork Bitterroot Restoration on Lazy J Cross

Applicant: Bitterroot Water Partnership

General Comments:

- Conceptual designs show minimal willow trenching/revegetation. Project narrative should justify this approach—why you believe fencing alone will be sufficient.
- The original 319 project on Lazy J Cross was very successful (and included a lot more willow trenching than in this proposal). Including before/after and documenting the success of willow trenches installed would benefit the application.
- Grazing management plan seems necessary, but not included in planning portion of application
- How is this section of the property currently being managed? What is the root cause of lack of riparian cover and erosion risk? How will the project address the root case?
- Why is this an important next step to address the NPS pollution? How will this help restore natural processes?
- Tease out your monitoring/NPS goals for this project more – success criteria should be time-bound and assess each project objective with adaptive management thresholds (see details under project effectiveness task)
- Include the minimum fence buffer of 35 feet per the design standards

- Consider including a map that shows all of Lazy J Cross Ranch to get a sense of how the project fits into the previous one/property as a whole
- In your budget you mention costs to remove old fence and install new fence. Be sure to describe that in implementation – is this replacing inadequate current fencing?
- Any landowner in kind match?
- Make sure you are using the correct 2026 form to ensure you are answering all questions (looks like you used the 2025 form) (*no co-benefit answer included*).

Project: Canyon Creek Restoration Phase 2

Applicant: Trout Unlimited

General Comments:

- Please expand on the Project Implementation Task. Is dam removal the only activity of this proposal? The application states that one mile downstream of dam is negatively affected by the sediment deposition. Will this project implement work downstream of the dam? If not, clarify how this downstream issue will be addressed, or has been addressed in the first phase. Will you be removing the beaver dam that is partially blocking flow around the culvert? Will beaver be able to remain in the project area? Will revegetation take place? Include information in the Project Implementation Task.
- Describe how often the new ford will need to be crossed to help the panel understand the appropriateness of a hardened crossing.
- I recall that the dam removal could not happen with your past application because FWP needed more time to determine if it was an appropriate barrier to remove. Include that narrative (why this needed to be phased out) in your project description.
- How many years does TU hold an instream flow lease on Canyon Creek?
- Photos indicate livestock currently have access to the stream. Is exclusion fencing included in this proposal? If not, how will long- term riparian protection be ensured following implementation of the Grazing Management Plan? Having you considered NRCS regenerative grazing pilot program for funding support?
- DEQ will help refine a monitoring strategy however please provide preliminary information of how you will determine effectiveness of project. You can give minimum expectations. E.g. a minimum 25% reduction in suspended sediment within 2–3 years post-removal, based on BEHI. Achieve a minimum 60% survival of

riparian plantings after 1 year, and 60% after 3 years, or you can show measurable improvements in channel stability using cross-section and longitudinal profile surveys and improvement in Rosgen channel stability indicators or similar geomorphic metrics within 3 years.

Project: Upper Cameron Creek Beaver Mimicry

Applicant: Bitterroot Water Partnership

General Comments:

- Use the 2026 application forms, not 2025 versions.
- Include more description how this relates to previously funded project. For example, what lessons did you learn about revegetation. Focus previously was willow trenches, but does not seem to be the approach with this proposal. Explain why (reed canary grass?). Additionally, how will grazing management developed under initial project meld with new grazing management planning?
- Would expect BEHI to be part of sediment monitoring
- On your map of proposed work – consider including the ID units that you refer and include the phased treatments to help get a better sense of the project phases as a whole
- Why this 2-mile section on the property? What is happening upstream that is causing this (what is the root cause)? How will this impact downstream section?
- Design needs to include a 35 ft vegetated buffer per design standards
- What are the anticipated maintenance needs for proposed treatments? State if beavers are expected to take over maintenance.
- What are the plans for each of the 3 years of proposed treatments?
- Tease out your monitoring/NPS goals for this project more – success criteria should be time-bound and assess each project objective with adaptive management thresholds (see details under project effectiveness task)
- Any landowner in kind match?
- On page 5 of the Supplemental Project Form, identify the specific impairments on East Fork Bitterroot River that the project is intended to address.
- Please be aware that collection of water temperature data as identified in the proposed deliverables for the Project Effectiveness Monitoring Task will require the development of a DEQ-approved sampling and analysis plan (SAP) if one is not already in place and there will be a requirement that all data be uploaded to the

Montana EquIS Water Quality Exchange (MT-eWQX) data portal. Preparing a SAP and uploading data to the portal requires a significant amount of time. The proposed budget does not currently reflect this. Additionally, temperature data can be noisy and this project may not generate a large enough signal to demonstrate temperature change.

- Fill out the Co-Benefit Considerations box. Discuss benefits the project will have for the landowner, for natural resource values beyond simply water quality, for fisheries, etc.
- It would be great to have a letter of support from the local FWP fisheries biologist.
- On the "Upper Cameron Creek Restoration Project Overview" map, please label the restoration units you identify as 1, 2 and 3 in the relative elevation model figures.
- Great job on the revegetation aspect of this project! 15,000 willow/cottonwood cuttings will go a long way towards restoring beaver habitat and the long-term sustainability of the project as a whole.
- Great job with the nonfederal match and volunteer engagement!!!

Project: Shields Loop Campground Fencing and Riparian Planting

Applicant: Trout Unlimited

General Comments:

- No funding was allocated to developing a Grazing Management Plan. Need to explain why it is not part of your budget if it is a required component for projects interacting with livestock management. How will the USFS incorporate the project with existing grazing allotments?
- This type of work seems much needed throughout the Shields River downstream. Elaborate on your EO activities to convince the panel that this project will generate interest from private landowners. THAT should be your measure of success.
- Conceptual designs need clarification how livestock won't access riparian area through the south east corner (does not show existing or proposed fence line).
- Acknowledge how recreation is impacting the project reach. Will fencing be required within the livestock exclusion area to prevent damage from campers? If not, why not?

- Conversely, acknowledge how the wetland upstream of the fenced area will be protected (or not?)--here's where the grazing management planning can play a big role. The more comprehensive the project, the better.
- On page 4 of the application, please specify the 12-digit Hydrologic Unit Code(s).
- Provide at least a few details in the Project Effectiveness Monitoring Task (see example task language below the text box for ideas). Presumably you had more specificity when you were determining budget amounts for the Effectiveness Monitoring task?
- The draft application doesn't address planting density or species composition. Include this information to justify the budget expense line item for "Potted plants". Also, was consideration given to using willow and cottonwood cuttings as a means of increasing planting density without increasing costs?

Project: Bangtail Creek Restoration Phase Two

Applicant: Halle Nienhaus (Montana Freshwater Partners)

General Comments:

- Nice work explaining the connection between this project and other projects within the same watershed.
- In the second text box on page 12, you include the statement "The tour will generally discuss nonpoint source pollution, its impacts, and how community members can take proactive steps to combat it using readily available solutions." The use of the term "generally" seems to suggest a casual emphasis. This topic deserves greater emphasis.
- Effectiveness of EO activities should include a measure of interest in projects generated.
- In the text box on page 14 of the application, provide a clearer connection between the "barriers to landowner participation" identified by MFP and how MFP will address these barriers through implementation of this project.
- In the project budget table, fill in the "Match Source" column for each row in which match is identified.
- You appear to have mislabeled one of the Flathead Creek Bank photos.
- The nonfederal match is 14%, which is close to the minimum 10%.
- Love that you have letters of support from landowner AND manager

Project: Lower Boulder River – Shaw Dam Removal and Riparian Restoration

Applicant: Trout Unlimited

General Comments:

- Great job on describing co-benefits of the project and collaborating with many local partners.
- The removal of the dam, head gate and irrigation ditches are dependent on the water rights changes from the two landowners. It looks like LR ranch water rights is complete but not Golden Sunlight Mine. Since the project depends on this water right, please estimate when Golden Sunlight Mine water rights change will be completed in the Project Partners section. Is it guaranteed, and what is your contingency plan if they don't follow through?
- In the application you outline education and outreach activities including tours and volunteer days. However, no funding has been allocated to volunteer coordination or event tour planning in the budget sheet.
- Please ensure project follows the minimum design standard from page 7 of the Call for Applications: "Projects involving riparian or wetland buffer creation must have a minimum buffer width of 35 feet, as measured from the ordinary high-water mark. If the buffer must be less than 35 feet in some places to accommodate bridges, water gaps or other infrastructure, the buffer should be made proportionately wider in other areas."
- Currently you are requesting funding for only the implementation task. We will need 319 funds (e.g. $100) allocated to each task. Please put small amount of funds towards each task that would be completed under a DEQ contract.
- Please be aware that collection of water temperature, DO and invertebrate sampling data as identified in the proposed deliverables for the Project Effectiveness Monitoring Task will require the development of a DEQ-approved sampling and analysis plan (SAP) if one is not already in place and there will be a requirement that all data be uploaded to the Montana EquIS Water Quality Exchange (MT-eWQX) data portal. Preparing a SAP and uploading data to the portal requires a significant amount of time. Additionally, temperature data can be noisy and this project may not generate a large enough signal to demonstrate temperature change. I would suggest removing from Project Effectiveness Monitoring task for this contract and leave in BEHI analysis.

- Please include proposed fencing on design plans and in narrative, describe how existing land use will be modified or able to coexist with the project.

Project: Flint Creek Phase 3 Conn Property Habitat Restoration Project

Applicant: Trout Unlimited

General Comments:

- The education and outreach activities planned for the project look great and it is okay to use match funding. We will need 319 funds (e.g. $100) allocated to each task. Please put small amount of funds towards each task that would be completed under a DEQ contract.
- What specific lessons were learned on past Phases and how have these design/plans been adapted?
- Design plans split phase three up (3A, 3B, 3C, 3D). 3A and 3B take place on Johnson Tuning Fork Ranch (JTFR). JTFR is not listed as a landowner in the application and no LOS was included. Is 3A and 3B apart of this Project? Please specify in Project Implementation Task. It would help to remove these design sheets from your attachments if they are not part of the proposed project.

Project: Lower Shields Riparian Restoration Project – Lawellin Project

Applicant: Montana Freshwater Partners

General Comments:

- This project came in on the same application as the Johnstone Project. Together, there is a request for $240,165. Minimum nonfederal match (10%) for this amount would be $26,695, and between the two projects you currently only have $25,545.20. Please increase the amount of nonfederal match or decrease the amount of 319 funds being requested.
- In the Project Implementation Task text box you describe using mechanical removal of reed canary grass, followed by scarification of the raw terraces and bars to

promote natural cottonwood and willow recruitment during flood events. Has this technique been used successfully in other projects? It would seem like this would promote natural reseeding of reed canary grass and other invasive species. Also, excavating out the reed canary grass could be extremely expensive, and it doesn't seem to be captured in the proposed budget.

- Based on aerial imagery, the cause of the loss of riparian vegetation appears to have been historical land clearing to make way for agriculture. However, confinement of the river channel seems to be a primary barrier to restoring a healthy, sustainable riparian corridor. The property immediately upstream of the proposed project area provides a good example of how the river can build and maintain diverse natural habitat if given the room to do so. Confinement of the river within the project area might make it difficult to sustain the benefits of the proposed plantings long-term as the stream will continue to bang against the banks or possibly downcut in order to dissipate energy and transport sediment down-valley. If the landowner is willing to consider the idea, a channel migration easement might be a more sustainable approach to addressing riparian health at this particular site.
- It is unclear from conceptual designs how livestock will continue to access water. Clarifying this may also clarify the need for the internal fence (proposal currently lacks justification for how internal fence benefits water quality). Also, please ensure new fenceline enables an average 35 ft buffer.
- Consider including description of outreach that has occurred with landowner on the otherside of the river. Will it be possible to incorporate this landowner into the design project? Have they already said no, or maybe they'd like to see how things go with the Lawellin property?

Project: Shields Watershed Capacity

Applicant: Trout Unlimited

General Comments:

- Please acknowledge what you were able to accomplish under the capacity building grant awarded last year (tie to metrics under current proposal), and how you are building on that with this proposal. Also need to build in a plan for building *sustainable* capacity beyond focus watershed designation.

- Anticipate the panel questioning why project implementation under the focus watershed effort is insufficient to generate additional projects. You say yourself, "this proven ability to identify, manage, and implement projects." If proven, why is additional capacity support necessary?

Project: Hound Creek Realignment and Floodplain Connection

Applicant: High Plains Conservation District

General Comments:

- You describe 3 projects in the application, please give further details as to why the realignment and floodplain connection project was determined to be the first phase to be completed.
- Please describe the root cause of pollution on page 11 of the application. Anticipating that degraded streamside vegetation from riparian grazing may be a part of that root cause, I think a more competitive project would be to remove the stressor from the stream first (ie fence all three phases and develop off stream water/grazing management plan so this is sustainable for the landowner). As a 2nd phase, do necessary in stream work. I also wonder about simplifying the instream work—could a laid back bank with a woody toe be sufficient *without* having to build a whole new channel? Try to address these alternatives in the proposal, or be prepared to answer questions from the panel.
- Consider including work upstream of the Phase I site to address the straightened channel that is likely contributing to erosion issues on the proposed bank. Without addressing the straightened channel, the project will still be under erosional stress
- A sampling and analysis plan will be required for water quality sampling (and this project is unlikely to result in demonstrable changes for the proposed parameters) and all data required to upload into the Water Quality Portal. Recommend removing sample analysis and water chemistry monitoring from proposal/budget.
- Budget describes *temporary* electric fence but proposal narrative implies this would be up a minimum 10 years. Recommend removing "temporary" from budget.
- Please adjust timeline – implementation task only covers 1st quarter?
- Budget shows significant grant and cash contributions by partners. Tell more of that story in the application narrative.
- Nice work obtaining high number of support letters.

- In budget: Define acronyms used, particularly those not included in application narrative (MRF, RAF, etc). Round costs to whole $ amounts. Missing E&O mileage in Total Project Cost column. Clarify that project implementation task costs come from Restoration Feasibility report.

Project: Sun River Watershed Capacity

Applicant: Sun River Watershed Group

General Comments:

- Acknowledge when the last WRP update occurred. 2022. When most WRPs are >10 years old, explain why an update is necessary now.
- Targeting MS4 communities (a point source) is a problematic use of nonpoint source pollution funding. Explain in your application why this is the appropriate audience for this funding. Education and outreach is already a required element of an MS4s stormwater permit.
- Please provide more information or examples for how engaging with the Little Shell Tribe will improve your organization's capacity to address nonpoint source pollution. What has and would engagement look like and what do you hope to achieve in working with the Tribe?
- #3 project activity is weak on its own and does not tie well to a next best step to reducing nonpoint source pollution. activities #1 and #2 will need to be strengthened.
- Rain barrels are a good way of engaging local citizens, but in Montana's dry, arid climate they tend to have very little impact on nonpoint source pollution. It would be more appropriate use of these funds to build citizen engagement through activities that have a more substantive impact on water quality.

Project: Grave Creek Rehabilitation Project Phase 1 - Hearn

Applicant: Lincoln Conservation District

General Comments:

- Inadequate match - $16,653 is the minimum 10% match. You can count your RRGL grant towards nonfederal match (assuming you don't plan to use RRGL as match elsewhere) in addition to LCD In kind. Include when you are expected to hear if awarded funded. What is the alternative if not awarded?
    - What about landowner in kind?
- I would expect BEHI measurements pre and post implementation to part of the project effectiveness evaluation for sediment reduction.
- Education/outreach – expand upon your plans for the stream channel youth and community education. What is the stream trailer and who owns it? Where will you do this education with youth? What about landowner tours and specifics about the Grave creek restoration site or opportunities for further landowner interest?
    - Consider describing what type of behavior change you are targeting and how these efforts are going to change that
    - Consider including metrics to evaluate the effectiveness – such as number of individuals reached, engagement rate, landowner interest, etc.
- Co- benefit section – anything additional you can mention regarding recent flooding in the NW MT area and how this may help decrease those impacts or help underserved markets?
- How is the property currently being used and managed?
- Include a description of what is upstream of the project site; what is impacting this flood pattern and identify what is the root cause of the erosion on this site.
    - Consider or describe how this can be a comprehensive project (addressing the root cause) and not just a one bank fix
    - 35-foot minimum riparian buffer required as a design standard
- Consider including a map that shows the prioritized reaches to demonstrate how this proposed project ties into the restoration efforts as a whole
- If this site is prioritized due to the risk for septic leachate, please include on the map the location of the tank in relation to the bank
    - Has the landowner considered moving the septic system? And why or why not is that an appropriate alternative?
    - Nonpoint source pollution reduction cannot be infrastructure protection projects. Page 12 project description should lead with a different purpose for the project.
- What specific lessons were learned on past Grave Creek restoration projects and how have these design/plans been adapted?
- For final submission, consider uploading directly, as the scanned version of the documents is difficult to read
- Please clarify whether the size of "large boulders" used for minivanes will be contextually appropriate. If boulders are larger than would naturally occur in Grave

Creek, they would cause unnecessary erosion. The minivanes and floodplain sill structures look not far from riprap, which is an ineligible activity.

Project: Upper East Gallatin Floodplain and Wetland Restoration

Applicant: Gallatin Watershed Council

General Comments:

- Please stick to 20-page limit for attachments. No need to include existing contract.
- Discussion of landowner contribution to the project (pg 6) is limited to their cash contribution to the previous design phase. Suggest additional description of how this represents a significant contribution to the current phase.
- The 4th bullet in the description of approved monitoring (pg 10) reads "Coordinate land access and laboratory analysis for sampling under the DEQ Wetland Effectiveness SAP". Please describe your proposal for continuing (or not) to include analysis costs in the project budget if new funds are added.
- In the description of Project Implementation (pg 11) and throughout application, suggest replacing/ supplementing the provided summary of the existing contract with a detailed description of the solution to the problems with the existing contract (funding sources, timeline, design modifications), so the reader can focus on what is new/different in this application. Demonstrate how you have explored every avenue to fund the project with existing resources.
- Please include budget from existing contract #223039 in the "Other Funding" column of your budget. This will help portray the full (old + new funds) budget and aid in determining if match and project admin calculations are correct, including what has already been funded, such as draft/final reporting.
- Budget table – Project admin task ask seems high for report writing (esp. final report, which is already included in existing contract) – break out overhead costs as its own line item, if appropriate.

Project: Lower Shields Riparian Restoration Project – Johnstone Project

Applicant: Montana Freshwater Partners

General Comments:

- This project came in on the same application as the Lawellin Project. Together, there is a request for $240,165. Minimum nonfederal match (10%) for this amount would be $26,695, and between the two projects you currently only have $25,545.20. Please increase the amount of nonfederal match or decrease the amount of 319 funds being requested.
- This project would include design and permitting for a greener alternative to traditional riprap at a site where channel migration is occurring at an accelerated pace. There is some value in finding and demonstrating the effectiveness of a more ecologically beneficial alternative to riprap. The root causes of the accelerated erosion at this site include the removal of native riparian vegetation to facilitate agricultural production, and the natural need for the river to migrate laterally in order to dissipate energy and transport sediment. The proposed project would only address one of these two root causes (the removal of riparian vegetation). Without addressing both root causes, this project will likely have a lesser chance for long-term success.
- This project has a strong infrastructure (pastureland) protection component, which may make it a better fit for other funding sources like DNRC's RRGL program.
- Please describe the current land use of the project site and how the design plans will address land use that may be contributing to bank stabilization. Livestock use seems to be occurring on the project site. Please explain why the design proposal is only addressing one eroding bank and not a comprehensive look at the full property.

Project: Lower Shields Watershed Capacity Development

Applicant: Park Conservation District

General Comments:

- Thank you for the well-defined deliverables.
- Great job connecting the proposed actions to how they will increase local capacity to address nonpoint source pollution.
- Love the support for partner projects. The CD's expertise in grazing and weed management is integral!
- Please provide a clearer explanation of the connection between the proposed project and the co-benefits with the Upper Yellowstone drought planning.

- Budget form: suggest some additional clarity in Match Source and/or Additional Info columns (PCD vs in-kind?). The easier this table is to understand, the better.
- Great letters of support!

Project: Lower Shields Project Development

Applicant: Montana Freshwater Partners

General Comments:

- Quantify as many of your proposed activities as possible. Clear contract deliverables make it easier to evaluate the merits of your proposal.
- In your proposal, you mention collection of water quality data as a potential activity. Collection of water quality data using DEQ nonpoint source funding would require the development of a sampling and analysis plan and uploading data to the Water Quality Portal, and it's unclear whether this expense is accounted for in your budget.
- The proposed project would maintain recent capacity, but it doesn't appear to build sustainable, long-term capacity. How are you planning to sustain capacity after the close of a potential 319 grant?
- Point out which activities/indicators are the same from your last proposal by quantifying results from the past capacity award.
- Be more succinct in writing. Focus on specific activities or types of activities.

Project: Montana Beaver Conflict Resolution Program

Applicant: National Wildlife Federation

General Comments:

- On budget table, please clarify which budget belongs to the MDT project versus the broader project.
- 10% match would be $10273 (or should pencil out across all applications)

- Please address how your project will "allow for the continued existence and future colonization of beaver." Will one of your eligibility criteria be that there is sufficient habitat nearby (define nearby) to support beaver remaining in the location?
- Convince the panel why this project is needed now. Have you received more requests than you have resources to support? Quantify that. Demonstrate that this is an ongoing project that has been successful
- Demonstrate how the proposal will help reduce NPS.
- It would be great to see landowner commitment captured in your budget for both proposals. Our most successful projects are that way because landowners love the project. One of your eligibility criteria for participating in your program should capture the landowner's level of commitment.
- Fix Applicant name
- Recommend a method to estimate sediment load reduction as the volume of sediment trapped behind dams.
- Justify that this project does more than maintain current populations of beaver on the landscape.
- How will the minimum 35 foot buffer be accomplished on these projects?

Project: Exclusion Fence on Unnamed Tributary to the Gallatin River

Applicant: National Wildlife Federation

General Comments:

- 10% match would be $473 (or should pencil out across applications)
- Application form indicates that planning and coordination will occur throughout the project, but it seems it only needs to occur in the first few quarters
- One of our minimum design requirements is "Projects must allow for the continued existence and future colonization of beaver." As written, this project is solely focused on excluding beaver from damming a culvert. Describe the habitat nearby that will enable beaver to continue coexisting at the site in general.
- Fix Applicant name
- If they are doing a training that has state workers they may be able to use their time as match that would help this project (confirm with agencies). Unless they are using federal HWY dollars.

- Need to ensure you will get all appropriate permits (spell out what has been required in past) for these projects. For example, what permits do exclusion fencing need/or flow devices? 310/124/318. 404? They are putting fill material in the river, does it qualify as NWP 3 maintenance?
- Justify that this project does more than maintain current populations of beaver on the site.
- How will the 35 foot buffer be accomplished on this project?

Project: Lake Helena Watershed Water Restoration Plan Update

Applicant: Lewis and Clark County

General Comments:

- Keep the focus on why your current WRP isn't reflective of current conditions and doesn't adequately serve your needs, rather than requirements for DEQ funding. 319 funding requires a WRP plan, but eligibility doesn't automatically expire after plan date.
- Don't duplicate narratives from your application form in an attachment. The space provided for each question on the form is intentional. Suggest using an attachment only to provide additional information if needed (e.g. content from pages 2-3 of your attachment)
- Move timeline narrative from your attachment into the space provided on the application form instead.
- Suggest adding more specifics for co-benefits – what drinking water supplies are downstream, recreation loss and human health risks from HABs, etc. (see Section 5.4 in Call for Applications).
- As the Call states, DEQ has funding to implement projects that could contribute to lessening the prevalence of harmful algal blooms. Capitalize on that in your application form. The timing for this WRP update would enable you to jump on this funding available for a limited time.
- Rather than community readiness assessment (referenced in your budget), we recommend reviewing Appendix D of the Call and incorporating Community Based Social Marketing
- Is match for admin task also staff time? Please populate match source for these line items.

Project: Upper Yellowstone Watershed – WRP Development (Phase 1)

Applicant: MT Freshwater Partners

General Comments:

- This proposal has strong ties to the intent of 319 capacity funds as "an appropriate next step towards preventing or reducing nonpoint source pollution".
- In Measurement and Sustainability (pg 3), you state: "Additional indicators of increased capacity will include strengthened partner relationships and enhanced understanding of priority nonpoint source pollution issues and data needs in the Upper Yellowstone Watershed." Clarify how these indicators will be measured.
- Love seeing "integration of WRP with newly developed hydrologic model"
- Strong co-benefits section.
- Nice letters of support.
    - Budget template – It's complex, but Monitoring and Assessment staff time is funded in part with DEQ's 319 program grant, so can't be counted as non-federal match. In general, suggest confirming with agency partners of intent to use staff time as match and request a letter of support.
    - Proposed timeline implies WRP development will only occur with monitoring and assessment staff—nonpoint source and wetlands staff like to be involved through the arch of WRP development. Recommend generalizing this to "DEQ staff"

Project: Growth and Development NPS Reduction

Applicant: Gallatin Watershed Council

General Comments:

- If you can make an explicit tie to implementing this project in the Camp/Godfrey watershed, it may increase your odds of tapping into Focus Watershed funding, though I don't think we'd be able to wholly consider this application that way.
- Panel likely will not know what a community readiness assessment is. Please include explanation—better yet, frame your project as community-based social marketing research (see Appendix D of the Call for Apps).
        - i.e. you've laid groundwork for steps 1&2 of CBSM, potentially this project could focus on CBSM steps 3&4

- "Develop Community Readiness Assessment questions to assess understanding of NPS pollution, stream and wetland stewardship, barriers to change, and perceived benefits," <-- please acknowledge that DEQ has already supported a pre-focus watershed community readiness assessment on the topic of NPS pollution broadly. It seems this proposal would enable us to conduct post-focus watershed community readiness assessment about NPS pollution generally, then hone in on community-based social marketing strategies to address development pressure specifically.
- Please explain how you will track development applications if these are typically not made public until a public comment period, which you specifically say you want to avoid being the starting point for engagement.
- Clarify whether you will need to subcontract to complete the CRA/CBSM work.
- The application does a great job identifying the target behaviors and the barriers you have identified through observations. Suggest clarifying how planned activities will address those barriers and lead to change.
- Issue with box formatting on form should be fixed now :)

Project: Libby Creek Concept Plan

Applicant: Lincoln CD

General Comments:

- Amazing landowner commitment demonstrated. Your pledge forms imply that only cash match will be accepted. Note that landowner time providing a service you would otherwise have to pay for, landowner equipment use, and landowner material donations are also eligible sources of match (in kind)
- Please discuss with Kootenai River Effort how this project could be incorporated as an update or addendum to the Watershed Restoration Plan and incorporate that into your application. I wouldn't want this effort to be disjointed from the WRP.
- I appreciate that your application describes the recommendations for Libby Creek from the WRP. Please include a status update on the projects it recommends. Have they been completed? Could DNRC be a partner on this project, committing to addressing the haul road?
- Erosion resulting from flood events themselves is natural. Please clarify in your application that you will not be developing spot treatments for specific eroding banks. The "root-cause assessment identifying dominant drivers of instability and appropriate stabilization approaches" should look wholistically at land use and *not*

result in rip rap as a stabilization approach. For example, if a bank is eroding because there is a pasture or field that has removed stabilizing vegetation, you would want to build a streamside buffer into the pasture, not just stabilize the bank. Another example, you would want to remove infrastructure from the streamside buffer, not stabilize the bank to protect it.

- I recommend including grant applications to implement high priority projects identified as a final deliverable.

Project: Polson Bay Golf Course Pollution Prevention Project

Applicant: Flathead Lakers

General Comments:

- In your Connection to a Previous Project response, please clarify if past E. coli monitoring at Boettcher Park has resulted in any E. coli detections and whether the project at the golf course (different property?) is expected to address some of this. You do an okay job of this in "additional monitoring" (still lacking clarification how the sampling at Boettcher Park is linked to activities at the golf course—a map could help), but it should be addressed when the reader first encounters the topic. Additionally, you might want to reconsider water quality monitoring as part of your project (see comments below), in which case Connection to a Previous Project is the best place to describe.
    - Please explain why additional fertilizer/irrigation water use reduction is not a feasible next best step for reducing pollution.
- Line 6 of budget says match source is landowner contribution, but additional info says it's Flathead Lakers commitment. Please clarify.
- Line 24 of your budget indicates sampling will take place in 2025 and 2026. 2025 is past and a potential contract would not be in place until late fall of 2026. Work done prior to the initiation of a contract cannot be reported as match. Please adjust line 24 as appropriate.
- In your budget table, you currently do not have any funding requested for several tasks. If a contract is awarded, you will need to at least have a nominal amount of nonpoint source funding tied to each task.
- Please look to ensure the check boxes on page 7 are populated. For some reason they are not showing in our file. Landowner Agreement page is also missing content.
- In the last text box on page 7 of your application, you describe the bioretention/retention pond as being 4 feet deep. In the Project Implementation

Task text box on Page 11 you describe the bioretention/retention pond as being 5 feet deep. Please clarify the depth of the proposed pond.

- In the last text box on page 7 of your application and in the first part of the Project Implementation Task text box on page 11 you describe the bioretention/retention pond as being 2,400 square feet, but in the lower part of the Project Implementation Task text box on page 11 you describe creation of a 1,000 square foot retention pond. The design map you submitted has two separate retention ponds. Please clarify the size of the proposed pond.
- Please explain how you determined how much storage capacity you will need in the proposed retention pond(s). Your explanation should include a description of the drainage area this pond will treat so reviewers have an idea of the appropriateness of its size
- Please explain the relationship of the proposed pollinator garden to nonpoint source pollution.
- In the Project Implementation Task text box on Page 11 you indicate that site preparation and engineering design work will begin in summer of 2026. If you are awarded a contract, the contract would likely not be initiated until late fall of 2026. Site preparation and engineering work completed during the summer of 2026 would not be eligible for reporting as match or submitting for funding reimbursement.
- In the Project Timeline, you show the project effectiveness monitoring task as extending through the third quarter of 2029. Your project administration task will need to extend as long as a potential contract remains open.
- Since you wrote the WRP, and you are the applicant for funding, you do not need to submit a letter of support for your own application. In the application form, noting that you authored the WRP is sufficient.
- You provided two copies of the topographic concept map and two copies of one of the site photos. One of each is sufficient.
- You provided approximately 30 pages of supplemental attachments. Please observe the 20-page limit.
- Please be aware that collection of water chemistry and E. coli data as identified in the proposed deliverables for the Project Effectiveness Monitoring Task will require the development of a DEQ-approved sampling and analysis plan (SAP) if one is not already in place and there will be a requirement that all data be uploaded to the Montana EquIS Water Quality Exchange (MT-eWQX) data portal. Preparing a SAP and uploading data to the portal requires a significant amount of time.
- Please clearly identify the location of the proposed riparian buffer plantings on the project map.

- Please describe the purpose of the bright green circles/shapes on the Topographic Concept Map.