

**Environmental Protection Agency  
Region 8 Non-Point Source Program  
Project Sponsors  
Project Proposal Guidance for  
FY 2000 and Beyond**

*Amended August 2002*

## **Executive Summary**

In the 1987 reauthorization of the Clean Water Act, Congress added §319 to help States, Territories, and Tribes respond to problems caused by nonpoint source pollution. Section 319 established baseline requirements for nonpoint source management programs and authorized national funding to support the implementation of approved State and Tribal nonpoint source management programs.

Region VIII provided guidance in 1996 to help guide project sponsors through the process of proposing a project for funding, including the content and format requirements, the review process, and an approximate schedule for the Regional review process. This guidance supercedes the 1996 Regional Nonpoint Source Guidance.

A significant change in the NPS program, and in this guidance, is the availability of additional (i.e., "incremental") §319 funds as a result of the Clean Water Action Plan (CWAP) of 1998. The CWAP requests that States and Tribes identify their highest priority watersheds for targeted funding of restoration activities, including among other things, the development and implementation of nonpoint source Total Maximum Daily Loads (TMDLs) for waterbodies on the States' 303(d) list. Current EPA Headquarters Guidelines reinforce this direction.

EPA continues to strengthen its support for State efforts to implement NPS TMDLs. A focused and sustained effort to restore impaired waters is essential. NPS TMDLs, together with watershed plans to implement NPS TMDLs, provide the technical underpinning for defining the problems and designing the solutions to our nation's most pressing water quality problems.

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## INTRODUCTION

In the 1987 reauthorization of the Clean Water Act (CWA), Congress added §319 to help States, Territories, and Tribes respond to problems caused by nonpoint source pollution. Nonpoint source pollution, or “polluted runoff” is created when rain, snowmelt, irrigation water, and other water sources run over the land, picking up pollutants and transporting them to local water bodies. Atmospheric deposition and hydrologic modification are considered sources of nonpoint pollution, as well. Nonpoint source pollution is also called “people pollution” because much of it is the result of activities that people do everyday. As a result, nonpoint source pollution is the biggest threat to our ponds, creeks, lakes, streams and rivers.

Section 319 established baseline requirements for state nonpoint source management programs and authorized national funding to support implementation of approved State and Tribal nonpoint source management programs and projects. EPA uses the existing section 319 allocation formula for the disbursement of funds (Appendix G, May 1996 Nonpoint Source Program and Grants Guidance).

“Base” funding now refers to all funding going to the state under Section 319 of the CWA, *except* for the incremental funding. “Base” funding under CWA §319(h) is provided to the states for three general purposes: 1) staffing and support to manage the nonpoint source (NPS) program; 2) implementation of projects to address identified NPS problems, and 3) a broad set of assessments and program development (limited to 20% of funding). Currently, §319 funding for Tribes is limited to implementation projects, and staffing and support.

Section 319(h) funds for implementation and assessment projects are distributed by the States competitively to support the most effective and highest priority projects, however, the emphasis should be on implementation projects to help restore water quality. Implementation projects can be in one of four general categories - watershed, information and education/demonstration, ground water and assessment/planning.

## INCREMENTAL FUNDING FOR DEVELOPING AND IMPLEMENTING NPS TMDLS

EPA continues to strengthen its support for State efforts to implement NPS TMDLs. A focused and sustained effort to restore impaired waters is essential. NPS TMDLs, together with watershed-based plans to implement NPS TMDLs, provide the technical underpinning for defining the problems and designing the solutions to our nation's most pressing water quality problems. These factors all point to the need to increasingly focus Section 319 grant dollars on implementing approved NPS TMDLs, under EPA's existing TMDL regulations and guidance, for nonpoint sources.

## FUNDING SPLIT

We recognize that some States have not yet developed sufficiently detailed watershed-based plans to help the States and their partners determine which management measures or practices should be implemented in particular places in the watershed to assure that the load reduction identified in a NPS TMDL is achieved and that all significant water quality problems in the watershed are successfully addressed. In such cases, a State may need to use more than 20% of its incremental funds to develop sound watershed plans that can then be implemented successfully. Where this is the case, the State and the Region should discuss the State's need to devote greater resources to completing watershed-based plans, recognizing at the same time the urgent need to focus most 319 funds on actual implementation efforts to achieve water quality improvements. Based on these discussions, the Region may authorize the State to use more than 20% of the incremental funds to develop these watershed plans.

## WATERSHED PLANS

*EPA Headquarters Guidance provides the following elements to include in the development of a watershed plan.*

To ensure that Section 319 projects succeed in restoring waters impaired by nonpoint source pollution, watershed plans that are developed with Section 319 funds should include the following elements. These elements will help provide reasonable assurance that the nonpoint source load allocations identified in the NPS TMDL will be achieved:

- a. An identification of the sources or groups of similar sources that will need to be controlled to achieve the load reductions established in the NPS TMDL (and to achieve any other watershed goals identified in the watershed-based plan);
- b. A description of the NPS management measures that will need to be implemented to achieve the load reductions established in the NPS TMDL (as well as to achieve other watershed goals identified in the watershed-based plan); an estimate of the load reductions expected for these management measures (recognizing the natural variability and the difficulty in precisely predicting the performance of management measures over time); and an identification of the critical areas in which those measures will need to be implemented to achieve the NPS TMDL;
- c. An estimate of the sources of technical and financial assistance needed, and/or authorities that will be relied upon, to implement the plan. As sources of funding, States should consider the use of their 319 programs, State Revolving Funds, USDA's Environmental Quality Incentives Program and Conservation Reserve Program, and other relevant Federal, State, local and private funds that may be available to assist in implementing the plan;
- d. An information/education component that will be used to enhance public understanding of the project and encourage their participation in selecting, designing, and implementing the NPS management measures;
- e. A schedule for implementing the NPS management measures identified in the plan that is reasonably expeditious;

- f. A description of interim, measurable milestones (e.g., amount of load reductions, or improvement in biological or habitat parameters) for determining whether NPS management measures or other control actions are being implemented;
- g. A set of criteria that can be used to determine whether substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether the NPS TMDL needs to be revised.
- h. A monitoring component to evaluate the effectiveness of the implementation efforts, measured against the criteria established under item (g) immediately above.

## **PROJECT PROPOSALS**

The State lead agency solicits project proposals from federal, state and local entities for both the base and incremental §319 funds. The State NPS Task Force plays a central role in this process. Before the request for proposals, the lead agency should determine project priorities by consulting the NPS management program document, and through discussions with the responsible entities.

With the availability of incremental funding, if a project is in a Category 1, or high priority watershed as identified in the State's 303(d) list or Tribe's Management Plan, the project may have greater eligibility for funding. All projects received by the States should be reviewed by the State NPS coordinator to determine how well the project will meet program priorities and help implement the State NPS management program, and which projects are in the high priority watersheds.

In addition, it should be determined if the proposed project strengthens, expands or balances the overall program goals and milestones found in the state NPS management program. Information on how the project supports or meets applicable goals, outputs, and milestones of the approved NPS management program document should be provided in the proposal.

Each proposal will consist of a narrative, a project summary sheet, milestone table, budget table, and maps. The narrative should provide comprehensive, clear and succinct information on the topic presented. Tasks identified within the proposal need to have the 319(h) expenditure identified in the narrative and also presented in the attached budget table. The milestone table should present each task with the associated timeline for completion and the actual outputs quantified. If the project is in a high priority watershed and will be funded with incremental funds, this should be noted on the Project Summary Sheet (Attachment 1).

If all the information is not available for a particular requested content item, the proposal should describe how the needed information will be collected and used. For the items or proposed activities that are not applicable or known for the project, provide an explanation or otherwise indicate in the proposal that the item has been considered, is not applicable, or is not known.

If the proposed activity is a continuation of an existing project, or is otherwise linked to a previously funded §319 activity, the proposal must describe the results or progress of the

previous project. This should include a summary page, deliverables received, status of the project and funding, and any other related grants received by the project sponsor. Documented satisfactory progress on existing or completed programs is a primary review criterion for evaluating continuation projects.

## **SCHEDULE**

### **State**

The following is the approximate schedule for proposal submittal, review, project implementation plan development and grant award:

States receive draft proposals	May - September
States and EPA review/comment on draft proposals	June - December
EPA provides funding targets which include reallocated funds	30 days after appropriation
States submit final proposals and grant applications to EPA regions	Mid-January
EPA regions approve proposals as PIPs and award grants	February - April

**This schedule may vary depending on whether a state applies for base and incremental funding separately. Base funding may be awarded on an expedited schedule, depending on appropriation dates.**

## **NON-FEDERAL MATCH**

Section 319(h)(3) provides that the Federal share shall not exceed 60 percent of the management program implementation cost and shall be made on the condition that the non-Federal share is provided from non-Federal sources. The match need not be on an item-by-item basis, but rather should be a single figure that covers the entire non-Federal share of the costs for implementation activities. The non-Federal match does not need to be contributed at the time of the grant award but the funds must be contributed in a timely manner as needed to meet the schedules established in work plan milestones. EPA Regions must verify that grantees have satisfied the match requirements upon review and submittal of the grantee's final financial status report. (Nonpoint Source Program and Grants Guidance...May 1996).

## TRIBAL

This section is based on specific tribal NPS guidance language for FY2002. Although it is already out of date, it is included here for planning purposes. Please consult the annual Tribal Nonpoint Source Guidance that is posted on EPA's Office of Water for specifics for the current year. National Nonpoint Source Website: <http://www.epa.gov/owow/nps/tribal.html>

### **Typical Timetable for Tribal Grants:**

Date Tribes to be Eligible for 319 Grants	January
Tribes Submit Base Grant Work Plans to Region	March
Tribes Submit Competitive Grant Proposals to Region	March
Region Forwards Proposals to Headquarters	March
Review Committee Discusses Proposals	April
Review Committee Forwards Ranking Scores to HQ	April
Headquarters Notifies Regions/Tribes of Selections	April
Tribes Submit Final Grant Application to Region	June

### **Statutory Tribal Funding Cap and FY 2002 Tribal Nonpoint Source Funding Level**

Congress has, for several years, authorized EPA to award nonpoint source pollution control grants to Indian tribes under Section 319 in an amount that exceeds the statutory cap (in Section 518(f) of the CWA) of 1/3% of the total 319 appropriation. This will enable all of the tribes that have approved nonpoint source assessments and management programs and "treatment-as-a-State" ("TAS") status (hereinafter referred to as "approved tribes") by January 30, 2002, to be eligible to receive Section 319 funding to help implement those programs. Congressional exceedances to the 1/3% authorization have so far been determined on a year to year basis, for one year only. As in the past, EPA will work with the tribes to continue to demonstrate that increased 319 funds for tribes can be used effectively to achieve water quality improvement. A total of \$6,000,000 has been authorized to tribes for FY 2002. This amount is based on three factors:

1. We will continue to support all eligible tribes with base grants.
2. We will award base funding to eligible tribes as follows:
  - a. \$30,000 in base funding will be awarded to eligible tribes whose land area is less than 1,000 square miles (640,000 acres).
  - b. \$50,000 in base funding will be awarded to eligible tribes whose land area is greater than 1,000 square miles (640,000 acres).
3. We will award the remaining funds to eligible tribes through a competitive process to support the implementation of priority watershed projects.

### **Summary of Discussion of Process for FY 2002 Grants to Tribes**

For complete information on the logistics of the annual funding process, please review “Guidelines on Awarding Section 319 Grants to Indian Tribes in FY 2002” located on EPA’s national Nonpoint Source website at: <http://www.epa.gov/owow/nps/tribal.html>

Tribes also have the option of submitting NPS proposals to the State for funding through the State NPS program.

### **1. Base Funding**

Each tribe that has an approved nonpoint source assessment and management program (and TAS status) as of January 30, 2002, will receive base funding based on the following land area scale:

<b><u>Square Miles (Acres)</u></b>	<b><u>Base Amount</u></b>
Less than 1,000 sq. mi. (less than 640,000 acres)	\$30,000
Over 1,000 sq. mi.(over 640,000 acres)	\$50,000

The base funding as outlined above may be used for a range of activities that implement the tribe’s approved NPS management program, including hiring a program coordinator; conducting nonpoint source education programs; providing training; and implementing, alone or in conjunction with other agencies or other funding sources, on-the-ground watershed projects. In general, this base funding should not be used for assessment activities.

This guidance is based on specific tribal NPS guidance language for FY2002. Although it is already out of date, it is included here for planning purposes. Please consult with the annual Tribal Nonpoint Source Guidance that is posted on EPA’s Office of Water for specifics for the current year. National Nonpoint Source website: <http://www.epa.gov/owow/nps/tribal.html>

### **2. Competitive Funding: Process and Schedule to Select Watershed Projects for FY 2002 Funding**

The remaining funds will be awarded to tribes that have approved nonpoint source management programs as of **January 30, 2002**, on a competitive basis to provide funding for on-the-ground nonpoint source watershed projects that are designed to achieve additional water quality improvement. Each selected project will be eligible to receive up to \$150,000, depending on the demonstrated need.

#### **Tribal Match Requirements**

The match requirement for Section 319 grants is 40 percent of the approved work plan costs, which include both the base funding and competitive funding components discussed above. In general, consistent with 40 CFR 31.24, the match requirement may be satisfied by allowable costs borne by non-federal grants, by cash donations from non-federal third parties, or by the value of third party in-kind contributions.

EPA’s regulations also provide that EPA may decrease the match requirement to as low as 10% if the tribe can demonstrate in writing to the Regional Administrator that fiscal circumstances within the tribe or within each tribe that is a member of the intertribal consortium are constrained to such an extent that fulfilling the match requirement would impose undue hardship. (See 40 CFR 35.635.)

In making grant awards to tribes that provide for a reduced match requirement, Regions should include a brief finding that the tribe has demonstrated that it does not have adequate funds to meet the required match.

### **Intertribal Consortia**

Some tribes have formed intertribal consortia to promote cooperative work. An intertribal consortium is a partnership between two or more tribes that is authorized by the governing bodies of those tribes to apply for and receive assistance under this program. (See 40 CFR 35.502.) The intertribal consortium is eligible only if the consortium demonstrates that all its members meet the eligibility requirements for the Section 319 program and authorize the consortium to apply for and receive assistance in accordance with 40 CFR 35.504. An intertribal consortium must submit to EPA adequate documentation of the existence of the partnership and the authorization of the consortium by its members to apply for and receive the grant. (See 40 CFR 35.504.)

### **Non-Tribal Lands**

The following discussion explains the extent to which Section 319(h) grants may be awarded to tribes for use outside the reservation. We discuss two types of off-reservation activities: (1) activities that are related to waters within a reservation, such as those relating to sources upstream of a waterway entering the reservation, and (2) activities that are unrelated to waters of a reservation. As discussed below, the first type of these activities may be eligible; the second is not.

#### **1. Activities that are Related to Waters within a Reservation**

Section 518 (e) of the CWA provides that EPA may treat an Indian tribe as a State for purposes of Section 319 of the CWA if, among other things, "the functions to be exercised by the Indian tribe pertain to the management and protection of water resources which are . . . within the borders of an Indian reservation." 33 U.S.C. § 1377 (e)(2). EPA already awards grants to tribes under Section 106 of the CWA for activities performed outside of a reservation that pertain to reservation waters, such as evaluating impacts of upstream waters on water resources within a reservation. Similarly, EPA has awarded section 106 grants to States to conduct monitoring outside of state borders. EPA has concluded that grants awarded to an Indian tribe pursuant to Section 319(h) may similarly be used to perform eligible Section 319(h) activities outside of a reservation if: (1) the activity pertains to the management and protection of waters within the reservation, and (2) just as for on-reservation activities, the tribe meets all other applicable requirements.

#### **2. Activities that are Unrelated to Waters of a Reservation**

As discussed above, EPA is authorized to award Section 319(h) grants to tribes to perform eligible Section 319(h) activities if the activities pertain to the management and protection of waters within a reservation and the tribe meets all other applicable requirements. In contrast, EPA is not authorized to award Section 319(h) grants for activities that *do not* pertain to waters of a reservation. For off-reservation areas, including "usual and accustomed" hunting, fishing, and gathering places, EPA must determine whether the activities pertain to waters of a reservation prior to awarding a grant.



## EVALUATION PROCESS

### State

Project proposals will be solicited by the State. Project sponsors will then submit project proposals to the State for review, ranking, and approval. Some states are assisted in this process by a NPS Task Force or Council.

Proposals approved by the State will be submitted to EPA Region VIII for review and approval. The EPA NPS Project Officer and State NPS Coordinator and project sponsor(s) will attempt to resolve problems and/or issues related to the proposal prior to EPA approval of the final proposal as a Project Implementation Plan (PIP). Additional members of the EPA staff such as representatives from Pesticides, Ground Water, and Mining Waste programs may review the proposal specific to their area of expertise prior to EPA approval.

The EPA NPS project officer will provide written comments as necessary on the proposals to the State NPS coordinator. Where the EPA project officer and the state coordinator agree informally on verbal comments and responses to comments, any changes discussed should be reflected in the project implementation plan prior to approval. Upon grant award, project approval and the release of individual project funds will be in writing.

The project evaluation will be based upon the general project criteria, the specific criteria provided for each project category, the actual content of the proposal as outlined in the project format section of this guidance. The policy papers issued by Region VIII will also be used in determining eligibility. Therefore, project sponsors should pay close attention to the criteria and policy information provided by the State.

### Tribal

Section 319 nonpoint source watershed grants are awarded to tribes through national competition. The process detailed here is for FY 2002 only, and may be subject to change in future years.

#### **Competitive Funding: Process and Schedule to Select Watershed Projects for FY 2002 Funding**

Remaining funds after disbursement of base amounts will be awarded to tribes that have approved nonpoint source management programs as of **January 30, 2002**, on a competitive basis to provide funding for on-the-ground nonpoint source watershed projects that are designed to achieve additional water quality improvement. Each selected project will be eligible to receive up to \$150,000, depending on the demonstrated need. The funds will be awarded using the process described below.

a. Watershed Project Review Committee

EPA established a Watershed Project Review Committee comprised of nine EPA staff, including three EPA Regional Nonpoint Source Coordinators, three EPA Regional Tribal Coordinators, two staff members of the Nonpoint Source Control Branch, and one staff member of the American Indian Environmental Office. The committee will then make funding decisions in accordance with the process described below.

b. Watershed Project Summaries

Tribes that have approved nonpoint source assessments and management programs as well as TAS status as of **January 30, 2002**, applied for watershed project funding by submitting watershed project summaries for proposed projects up to a maximum budget of \$150,000. (This funding is in addition to the base funding that each approved tribe received). Tribes that apply for funding for watershed projects submitted a brief (e.g., 3-5 pages) summary of a watershed project implementation plan by **March 4, 2002**, to the appropriate EPA Regional office for initial screening. (Complete grant applications are not submitted until after projects are selected, pursuant to review by the Watershed Project Review Committee, as described below.) The Regional office, by **March 18, 2002**, forwarded the proposals that met the required criteria to EPA Headquarters for distribution to the Watershed Project Review Committee. (E-mail versions are appreciated where possible because they can be shared among the reviewers most rapidly and easily.)

The watershed project summary should outline the nonpoint source pollution problem and the on-the-ground improvement to be addressed; the project's goals and objectives and the expected water quality benefit to the receiving waterbody; the lead implementing agency (either the tribe or another organization authorized by the tribe to be the project leader) and other agencies that will be authorized to expend project funds; the types of best management practices or measures that will be implemented; the projected implementation schedule; the project's budget items including construction costs; and the environmental performance measures that will be used to evaluate the success of the project. Each watershed plan summary should be clearly written with enough detail to show why the proposed project should be selected for competitive funding. This is critical to help ensure that the best projects are funded.

c. Selection Criteria for Funding Watershed Projects

In ranking the projects, each reviewer on EPA's Watershed Project Review Committee will consider the extent to which the following factors are present in each project:

1. The watershed plan summary includes a clear and specific identification of the on-the-ground improvement project and the water quality problem to be addressed, including the pollutants of concern and their sources (including critical areas to be treated, if known), and clearly describes the project to be constructed or installed.
2. Where relevant, the watershed project consists of implementation actions or load calculations that are intended to help restore an impaired waterbody for which an approved nonpoint source total maximum daily load (NPS TMDL) has been developed or the NPS components of mixed-source TMDL's. [Note: EPA recognizes that most tribes

have not yet developed NPS TMDLs. However, Section 319 funding may be used to develop and implement approved NPS TMDLs for any 303(d) listed waterbody. Where a tribe has developed a relevant water quality standard and NPS TMDL and seeks Section 319 funding to assist in the implementation of the NPS TMDL, that should be considered by reviewers to be a relevant factor supporting the funding request.]

3. The proposed project is listed as a priority implementation project in the tribal NPS management program.

4. The proposed project is designed to include cooperation and/or combination of resources with other agencies and other parties to provide additional technical and/or financial assistance to the project.

5. The watershed plan summary includes a clear and objective statement of the project's goals and objectives, in terms of controlling nonpoint sources and/or of improving/protecting water quality.

6. The summary identifies the best management practices or measures to be implemented and the location where these measures and practices will be implemented.

7. The summary outlines the construction cost of the project and the amount of Section 319 grant dollars that are requested, not to exceed \$150,000. Please note that a 40% non-federal match is also required. However, pursuant to Section 35.635(b), EPA's Regional Administrator may increase the maximum Federal share if the tribe or intertribal consortium can demonstrate in writing to the satisfaction of the Regional Administrator that fiscal circumstances within the tribe or within each tribe that is a member of the intertribal consortium are constrained to such an extent that fulfilling the match requirement would impose undue hardship. In no case will the federal share be greater than 90 percent.

8. The summary includes an implementation schedule.

9. The summary includes a statement of how the project will be evaluated to determine its success and to derive lessons that will assist the tribe (and other tribes) in future projects.

d. Award of Grants for Tribal Watershed Projects

Award Decisions

The Watershed Project Review Committee will hold a conference call by **April 8, 2002**, to ensure that all Committee members fully understand and agree on how to objectively apply the criteria discussed above. Rankings will be developed by considering all of the factors as a whole, in accordance with a weighting system to be decided upon by the Committee.

By **April 19, 2002**, the Committee will compile the ranking of proposed watershed projects based on the selection criteria and then forward their rankings to the Nonpoint Source Control Branch at EPA Headquarters. Headquarters will tally the Committee's rankings and then hold a conference call to provide a final opportunity for members of the Review Committee to discuss the rankings among themselves. By **April 29, 2002**, EPA will select the highest ranked proposals and announce to the Regions which tribes' watershed projects have been selected for funding. These tribes will be notified immediately by phone or e-mail, with a written letter to follow.

#### Final Work Plans/Full Grant Applications

Once a Region and tribe have been notified of the amount that will be awarded to the tribe, they will negotiate a final work plan consistent with 40 CFR 35.507. After making appropriate changes, the tribe must submit a final work plan to the Region by **June 10, 2002**. If a tribe fails to or is unable to submit an approvable work plan by June 10, 2002, the 319(h) grant will instead be awarded to the next highest ranking unfunded application. Regions should endeavor to finalize the grant awards no later than 60 days after receipt of a complete grant application with an approvable work plan.

## PROJECT CATEGORIES

Projects can be submitted under any one of four categories: Watershed, Information and Education, Groundwater, and Assessment/Planning. The EPA encourages pollution prevention activities in all types of projects. To determine the category under which to apply, consider the following descriptions.

### **Watershed Projects**

Watershed projects should be comprehensive and address major sources of nonpoint source pollution affecting water quality in the watershed. The project sponsors should be consistent with the State's NPS Management Plan as the proposal is developed. The primary project objective should be to reduce the pollutant load entering either surface or groundwater from nonpoint sources such that beneficial uses are restored or protected. The EPA encourages watershed projects that demonstrate new or innovative technical and institutional approaches that produce information that can be transferred to other areas.

Projects which involve testing newly developed and/or innovative BMPs which have not been approved by the EPA, are encouraged. These projects are designed to examine newly developed and innovative techniques and can be funded as watershed or information and education, or demonstration projects. Some additional Quality Assurance Project Plan requirements will be involved if 319 funds are to be used to collect environmental data. Check with the State NPS coordinator when in doubt.

### **Assessment/Planning Projects**

Section 319 funds are to be used primarily for the implementation of the State NPS Management Programs. However, limited 319 funding for implementation targeting, program and plan development, or associated assessments may be appropriate as provided by EPA Headquarters guidance.

States are authorized to use up to 20% of their Section 319 base (see page 3 for a description of base funding) allocation to carry out a number of activities that have generally been associated with nonpoint source assessments. For example, States may require additional assessment work either as part of specific watershed projects, or as part of an overall Statewide, regional, or ecoregional effort. Such additional assessment work will enable States to develop watershed proposals, more clearly identify and prioritize their nonpoint source problems, evaluate the effectiveness of their nonpoint source management programs, and measure progress toward environmental goals. (Nonpoint Source Program and Grants Guidance..., May 1996).

### **Groundwater Projects**

Groundwater projects should focus on protecting those groundwater resources that, if contaminated, would pose human health, welfare and ecological risks. Groundwater project priorities need to be identified in the State NPS Management Plan or an equivalent State Groundwater Management Plan as stipulated in the Region VIII Groundwater policy paper.

### **Information and Education Projects**

I&E projects generally involve one of two classifications of activities:

1 The development and distribution of information, e.g., publications, videos, establishment of internet web sites, or the development and presentation of various training activities. Project priorities need to be developed in concert with the State NPS information and education strategy and/or the I&E Coordinator as defined in the State NPS Management Plan.

2 The development of new BMPs or the demonstration of approved BMPs. EPA Region VIII prefers that demonstration projects be located within existing or proposed watershed projects. Need for the demonstration project should be specified in the State NPS Management Plan.

Information and Education activities in high priority areas are eligible for incremental funding, especially as they may relate to capacity-building for project implementation in a watershed.

## GENERAL PROJECT CRITERIA

The State NPS lead agency will submit to EPA only those projects that comply with the State NPS Management Plan, and meet the following general criteria:

1. Project Demonstrates a Water Quality Program Need

The project must clearly describe a NPS program need and resulting benefit. Prevention of pollution in impacted or threatened waters is also considered a benefit.

2. Project Complies With State Strategy and Priority

The proposed project should comply with the State strategy as reflected in the upgraded NPS Management Plan which references: explicit short- and long-term goals, objectives and strategies to protect surface and groundwater, priority watersheds and the watershed approach, the CWA §303(d) list of waterbodies in need of TMDLs, needs assessment, Pesticides in Groundwater State Management Plan and/or a Comprehensive Groundwater Strategy.

3. Project is Well Planned

The project should be an efficient and effective approach to achieve the State goals for maintaining and improving water quality. The tasks/activities should be logically presented, and the responsible entities and their contributions clearly defined.

4. Project Shows Program Coordination

The project should show the coordination of the organizations that will be most logically involved in, or affected by, the project.

5. Project Describes Products

The Project should describe the products of the project, including the final project report. Products need to be transferable to other projects or parties with similar interests. The project products should help contribute or lead to a measurable water resource benefit.

6. Project Costs Are Reasonable and Appropriate

The proposed costs should be reasonable and appropriate for the work being proposed. Costs that appear excessive need to be explained.

Proposed costs need to be appropriate for 319 funding. For example, proposed staffing activities that involve 319 financial support for personnel from other agencies to work on NPS projects need to consider the following EPA guidelines. Frequently, funding is requested from 319(h) to provide technical assistance from other governmental organizations (i.e., NRCS, State wildlife agency) as part of a NPS project. If this request is made, an explanation should be provided to

justify why the agency requires 319(h) funds to participate in the project/program. Examples of when 319 funds can be used to support other agency personnel are:

A new position is added to a field office staff to provide full-time technical assistance to a NPS project;

A new position is added to the existing staff to provide time for a person with relevant skills to work on the project;

The cost of detailing an existing employee to an office to provide technical or other assistance to the project. Only the costs of the detail, such as per diem and transportation, would be considered but salary would not be included.

7. The Project is in a Priority Watershed

For projects submitted for incremental §319 funding, the project must be located in a priority watershed as identified in the State's 303(d) list, or Tribe's management plan.

## SPECIFIC CRITERIA FOR WATERSHED PROJECTS

In addition to the general criteria specified above, EPA will use two categories of project-specific criteria in its evaluation process: 1) project suitability; and 2) project proposal content. These emphasize project appropriateness and areas to which special attention should be given as the proposal is developed.

### A. Project Suitability

- 1 The goal(s) of the project must focus on water quality improvement: restoration and/or protection of threatened waters.
- 2 The size and complexity (acres or number of operators/landowners) of the watershed/aquifer should be small enough that the project can address all or most sources of the pollution problem. Improvements in water quality or protection of designated uses should be a realistic outcome.
- 3 Cooperative projects are encouraged. However, if §319 is not the most appropriate source of funds for particular project activities, other sources should be researched. If other agencies are more pertinent sources, 319 should not be the major source of funds. EPA may be willing to consider supporting other agency training programs subject to need.
- 4 Section 319 funds may not be used to fund any urban storm water activities that are specifically required by a draft or final NPDES permit. EPA has issued several regulations defining what activities are subject to the NPDES permit application requirements of section 402(p)(2) of the CWA.
- 5 Stormwater Phase II final rule was published in the Federal Register December 8, 1999 by EPA. It expands the National Pollutant Discharge Elimination System (NPDES) to cover all small municipal separate storm sewer systems (MS4s) within urbanized areas as well as construction sites that disturb 1 to 5 acres (construction sites 5 acres and larger are covered by the existing storm water rule). Permit coverage for regulated small MS4s and construction sites between 1 and 5 acres will be required near the beginning of 2003. Until EPA, States or Tribes issue draft or final NPDES permits for the Phase II storm water sources, States may use Section 319(h) funds for those storm water discharges that are not addressed by existing, Phase I or II storm water program requirements. These include both Phase II discharges as well as aspects of Phase I activities that support but do not directly implement activities required by Phase I permits.
- 6 Projects which address some activities related to abandoned or inactive mines and mining wastes may be funded until specifically prohibited.
- 7 Activities under a notice of violation or enforcement agreement under the NPDES program may not be funded. Abandoned and inactive mines that have not historically

required an NPDES permit are eligible for funding if mines are addressed in the State NPS Management Plan.

8 Pollution prevention activities or actions which reduce threats to water quality are appropriate uses of funds.

9 In-stream, in-lake and near-stream restoration activities may be an important component of an overall watershed restoration strategy but should not be implemented without investigating and addressing the fundamental causes or sources of the problem.

10 The complete stream system dynamics of the watershed should be considered, particularly during the planning of in-stream or near stream activities. For example, the nature of the stream system and stream stability problems needs to be understood before recommending the installation of in-stream structures or habitat improvement. Thus, technologies and BMPs should be appropriate within the context of the specific watershed.

11 Projects that result in the development and implementation of TMDLs to address 303(d)-listed waters are encouraged.

12 Animal waste management projects. Facilities having greater than 1,000 animal units are required to be permitted under NPDES §402, and as such, are not eligible for funding under §319. In addition, facilities under 1,000 animal units, which have been issued a discharge permit by the appropriate State agency, or a notice of violation by EPA or the State, are not eligible for funding under §319.

## **B. Proposal Content**

1 The need for the project must be based on an assessment of current conditions, especially as they may deviate from water quality standards, including the narrative, use classification, numeric and antidegradation components of those standards. To support the need for the project, the assessment information may be obtained from water column chemistry data, photo documentation, habitat analyses, streambank and riparian area evaluations, toxicity tests, and/or biological indicators. Sometimes surrogate measures are useful methods to demonstrate need. For example, rapid housing and commercial development in a relatively pristine area and the associated potential water quality problems could be the basis for a pollution prevention project.

2 It is especially important that, wherever possible, measurable water quality goals be established at the beginning of each project to help determine the success or failure of the project. For example, this would contrast with goals established on such things as the number of BMPs put in place. For projects that can establish measurable water quality goals, it is important to be sure they are determined with enough detail to be helpful (e.g., "Establish a macroinvertebrate benchmark station within the watershed where you will try

to achieve a BCI value within a certain range after a number of years) instead of broad statements related to water quality goals (e.g., "restore the cold water aquatic life use".)

3 Attention should be given to the most efficient and effective use of funds. For example, streambank rip-rap may be relatively expensive and not provide additional values beyond those that may be derived from restoration techniques such as streambank stabilization with plant materials and improved land use practices. Where grazing is an issue, grazing management systems may be more efficient and effective than bank repair and in-stream structures. Some animal waste management systems are as effective but less costly than others. The important point is that the project sponsor must decide, and convince both the State Agency and the EPA that the proposed use of 319 funds is effective and efficient based on an examination of various approaches proposed to accomplish the project goals and objectives.

4 Each proposal needs to describe a well-planned monitoring strategy. At a minimum, the aim of this plan should be to detect how successful the project is in restoring or protecting a use. Similarly, monitoring should relate back to the water quality standards and or any TMDL-related endpoint that may be established.

5 Goals and objectives of the monitoring plan describe what questions, regarding the effectiveness of the project, will be answered. They are related to, but not always the same as, the project goals and objectives. Each project should develop a Sampling and Analysis Plan which is consistent with and linked to the appropriate EPA-approved State or Tribal Quality Assurance Project Plan (QAPP).

6 Each proposal needs to describe a well-developed information dissemination, or technology transfer, plan. Funding necessary to carry out this plan should be included in the proposal. Interaction and coordination with the statewide NPS information and education program and other similar statewide programs is important.

7 To be eligible for 319-funded cost share, land owners and operators must practice nutrient and pesticide management consistent with the Natural Resource Conservation Service's (NRCS) Field Office Technical Guide or other Federal/State/local standards, as appropriate to their operation.

8 The total Federal contribution of cost sharing may not exceed 75% of the total cost of the practice or activity.

9 Each proposal needs to describe how recipients of Section 319 funds to install Best Management Practices (BMPs) will assure proper operation and maintenance (O&M) of funded BMPs. (See section 3.6 - Format for Watershed Project Proposals).

10 The proposal should describe the steps taken to coordinate with and involve potentially interested parties in formulating and implementing the project.

11 A review of the potentially required permits needs to be conducted and documented.

12 The proposal must identify critical watershed and/or aquifer areas and explain how they were determined.

13 For 303(d)-listed waters impaired solely or primarily by nonpoint sources, approved NPS TMDLs should be included as objectives to be met by the project. TMDL implementation may involve individual landowners and public or private enterprises engaged in agriculture, forestry, or urban development. (Memorandum: “New Policies for Establishing and Implementing Total Maximum Daily Loads (TMDLs)”, signed by Robert Perciasepe, Assistant Administrator, Office of Water, EPA, August 8, 1997). The proposal should also briefly outline the prioritization process by which the landowners will be chosen for funding assistance.

## **FORMAT FOR WATERSHED PROJECT PROPOSALS**

### **1.0 PROJECT PROPOSAL SUMMARY SHEET**

A Project Proposal Summary page will precede each proposal. The format to be followed has been provided (Attachment 1).

### **2.0 STATEMENT OF NEED**

2.1 Discuss the project water quality priority as specified in the NPS Management Plan, the Unified Watershed Assessment, (if applying for incremental funding), the Clean Water Act (CWA), the §305(b) Report, and/or the CWA §303(d) list. Describe the need for the project, and the existing or potential water quality problem(s). The information should include a listing of the pollutant type, water quality standards violated or threatened and the uses of the water resource not being met or being threatened (e.g., kind and amount of recreational use, drinking water supply for how many people, spawning stream). The stream and/or aquifer water quality classification should be provided, if available.

If the waterbody being addressed is included on the State's 303(d) list of impaired and threatened waters, the need for, and the approach being used, for the development and/or the implementation of a TMDL should be included.

When an intermittent stream is involved in the project, either as a pollutant load contributor, or as a 303(d) listed segment requiring a TMDL, describe the proximity of the stream to the water body being impaired and the portion of the pollutant load being contributed by the intermittent stream.

2.2 Identify the waterbody, and provide descriptive information that might be useful regarding the water resource which will aid in judging the value of the project. Example information pertinent to a stream includes hydrologic unit code (HUC), stream order, flow characteristics, geomorphic stream classification, physical condition and stream stability. Information concerning lakes/reservoirs should include lake size, trophic status or other measures of lake health and any additional descriptors derived from previous investigations (e.g., Clean Lakes projects, advanced wetland identification, etc.). These may be summarized rather than referenced in the proposal.

In addition, describe aquatic habitat health. There should be a description of the baseline information and data sources with an assessment as to the quality (accuracy/precision) of existing data.

2.3 Provide maps (especially Geographic Information System (GIS) maps) showing the location and size of the waterbody and watershed and/or aquifer. Information incorporated on the map should include land uses, land ownership, project location, and important water resources (including major wetlands). Also, provide information on

locations of present, past and future sampling sites, sources of problems or critical areas and other pertinent information such as wells, natural springs, and point sources.

2.4 Provide general information on the watershed such as topography, elevation, land ownership, land use, precipitation (with seasonal distribution), other climatic information, soils, geology, erosion rates, aquifer vulnerability, source water and wellhead protection areas, vegetation conditions, and man-made features. Include available information that is relevant to the type of watershed water quality problem.

For example, for agricultural projects: list crop types, irrigation systems, physical condition of stream, types of enterprises (cow-calf, horse, sheep), management systems, Animal Unit Months (AUMs), range site, range condition and trend. Section 319 funds may not be used to increase acreages under cultivation.

For silvicultural projects: provide miles of temporary and permanent roads within 100 feet of perennial drainages, acreage of timber sales within 100 feet of perennial drainages, percent of watershed under timber management, elevation and aspect of cut.

For urban projects: list type of urban development, acreage of various land uses such as parks, housing, industrial areas.

For mining projects: provide volume, locations, and chemistry of tailings and adit discharges, and groundwater-surface water relationships.

2.5 Provide available information that defines the type of watershed water quality problem (chemical, biological, physical/habitat). Identify, to the extent possible, the source(s) of the pollutant or cause of the environmental degradation, and the relative contribution of these sources. If chemical or sediment constituents are involved, provide available loading and concentration information. If problems are related to physical/habitat decline, document the cause of the degradation. Include information on the timing of the pollution problem (e.g., storm-event related, low flow or continuous).

For example, for agricultural projects, if irrigation return flow is the source, provide information on the flow, concentrations of the pertinent constituents and their loads.

For silvicultural projects, if erosion from forest practices such as timber cutting and road construction is resulting in habitat disruption from excessive sediment load to the adjacent waterbody, provide the appropriate documentation connecting the land use practice with the degraded or potentially degraded beneficial use.

For urban projects, if increased development will be threatening water quality, define the current sources and anticipated sources and project loadings.

For mining projects, if abandoned mine tailings are a source of water quality impairment provide the chemistry of tailings, adit discharges, loading and concentrations of the important constituents, and groundwater-surface water relationships to the extent that they are known.

### **3.0 PROJECT DESCRIPTION**

3.1 Describe the environmental and programmatic goals(s) for the watershed and the project. There is a distinction between environmental and programmatic goals; avoid confusing the two, substituting programmatic for environmental goals. Goals are broad statements linked to the project need and are achievable through measurable objectives. Goals may describe, for example, BMPs to be implemented and why; new tools to be developed and for whom; the benefits expected to be derived in terms of water quality, aquatic habitat, and stream stability; and changes in public attitudes or awareness of NPS problems and solutions.

One example of an environmental goal would be "Restore the recreational health of the Green River by decreasing nutrient loads that contribute to over-enrichment." which would be based on environmental objectives such as "Achieve a biomass concentration of 150 gm/m<sup>2</sup> as a summer time instantaneous reading and 100 gm/m<sup>2</sup> as a summer time 60-day average reading in the selected monitoring locations." This would be backed up by programmatic goals such as "Identify and implement appropriate grazing practices to reduce the amount of sediment and nutrients entering the Green River" and programmatic objectives such as "Sponsor a demonstration project of seasonal management of livestock on the Clear Fork of the Green River."

Both types of goals/objectives are crucial to a TMDL in that the environmental goal/objectives provide a water quality standards target the programmatic goals/objectives describe the means by which we get to our water quality target.

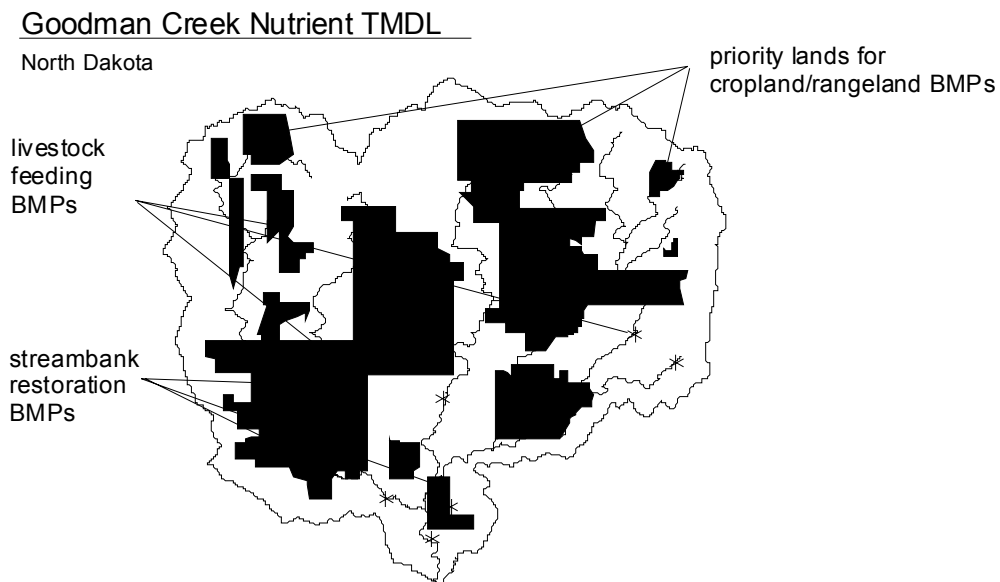
If a TMDL is being developed for the project, the environmental goals/objective of the project could also serve as the water quality standards endpoint for the TMDL. The TMDL endpoint can be expressed in any number of ways, such as pollutant concentration, pollutant load, desired biological condition, stream morphological condition, an acceptable amount of benthic sediment or suspended sediment, or an acceptable amount of benthic or suspended algae.

3.2 List and provide a narrative description of each objective and task. Objectives specify in more detail what is to be accomplished to help meet the goal. Each objective should have at least one associated task to be performed to accomplish the objective. Tasks are specific activities that include milestones, outputs, responsible parties, and costs. Reference can be made to the milestone or budget table for the specific quantities of products.

Objectives and tasks to achieve a total maximum daily load (TMDL) have the potential to cover sources as diverse as grazing, stream restoration, irrigation, or feedlots. By describing the Best Management Practices (BMPs) that will be implemented, and how their implementation contributes to achieving the objective, the cumulative benefits of implementing the objectives and tasks described should be designed to add up to meeting the goal(s) of the project as described in 3.1.

Objectives and tasks associated with a TMDL essentially outline a picture of allocation in a watershed. They can be envisioned as an “allocation of BMPs”: applying “X” BMPs at “X” locations in the watershed, to create a picture of allocation. It has been shown to be effective when maps are used to show the distribution of BMPs within the project area, thus showing the allocation of the TMDL throughout the watershed in terms of control actions. If an estimate of loading reduction can be made on a sub-watershed basis, this could also be mapped out or discussed within the narrative.

*Figure 1 - One example of a watershed allocation map*



Finally, if a TMDL is being developed, the TMDL itself, needs to be expressed within the project proposal. This could be integrated into either the environmental or programmatic goals/objectives. Technical assistance is available for TMDL development and implementation.

The following are examples of goals, objectives and accompanying tasks in the **recommended format** from several different 319 projects. Project examples have been mixed and matched and presented in a generic format. They demonstrate goals and objectives for uplands as well as near-stream/instream areas. What we see with many projects is that they address both. Modeling was used to identify/estimate sediment loads in some of the examples.

**GOALS:** *A number of TMDL targets are illustrated here to meet the goal of reducing impairment on stream X.*

**Goal:** *First, is the establishment of a numeric goal for suspended sediment load. Meeting a state numeric standard for suspended sediment is an obvious goal, but state X lacks such a standard. In addition, because of the relationship between discharge and TSS, it is difficult to set a specific target because these targets could be met in low water years and exceeded in unusually wet years. One proposed goal, then, is to: **decrease the slope of the regression between discharge vs. TSS by half in 4 out of 5 years (for stream x, from 0.51 to 0.26).***

**Objective:** *Reduce sediment coming from 96,000 acres of eroding poor condition range land by 130,000 tons/year.*

**Task:** *Reestablish vegetative ground cover on 3,000 acres of rangeland (very poor condition and located on south facing slopes) by: controlling weeds on 1,000 acres; reseeding 3,000 acres with improved varieties of grasses and forbs, installing fencing, livestock water developments; applying deferred grazing on 3,000 acres.*

**Products:** *Establish suitable vegetative cover on 3,000 acres, reseed 3,000 acres, install cross fencing and livestock water developments and deferred grazing on 3,000 acres. Reduce sediment, with associated phosphorous, by 24,000 tons annually.*

**Cost:** *\$70,000*

**Goal:** *Another TMDL target to measure reduction in suspended sediment load is to compare sediment loading with a neighboring watershed in which excessive bank erosion or suspended sediment levels are not a problem. **The numeric goal could be that sediment load during spring run-off does not differ significantly between stream X and the reference stream in 4 out of 5 years.***

**Goal:** *Another TMDL target is based on a quantifiable reduction in the amount of erosive banks. By decreasing the contribution of sediment and increasing channel stability, this would address several of the identified stressors in stream X including high TSS, high total phosphorus, and high substrate embeddedness.*

*One approach to this would be to identify priority stream banks (i.e., banks that are a significant source of sediment or are implicated in potential loss of stream length). For example, priority banks for stream X are identified as eroding banks with a length of greater than 100 feet and or height of greater than 5 feet. An over all target is to **decrease the percentage of eroding banks by 50% over the next 10 years.***

**Objective:** *Improve riparian habitat condition and function along 30 miles of stream, and reduce impairments to water quality caused by sediment loading from 5 miles of critically*

*eroding stream banks and channel. Practices that will be used to achieve this objective will include proper grazing management, fencing, off-stream livestock water developments, pasture management, stream bank stabilization (revetment), channel vegetation, and critical area seeding. (Refer to the Budget Tables for costs and quantities by practice to be implemented with each task listed below).*

*Task: NRCS will assist cooperators in implementing vegetative stabilization BMPs to protect 3.75 miles of stream banks (at least 75% of the damaged area). Measures to be implemented will be primarily revegetation BMPs such as dormant stump planting, critical area planting, channel vegetation, and tree revetment.*

*Product: Stability of stream banks that will benefit fifteen (15) miles of stream banks and stream channel reducing sediment loading to Otter Creek.*  
*Cost: \$99,000*

*Task : NRCS will assist cooperators in implementing practices that will facilitate grazing management, control animal access along approximately 22 miles (75%) of stream, protect stream banks on at least 75% of the damaged area and enhance and protect the riparian zone. Practices that will be implemented will include fencing, development of off-stream livestock watering facilities and planned grazing systems.*

*Product: Improved grazing management, controlled animal access along the stream, reduced sediment loading from stream bank erosion; improved condition and function of riparian habitat along 22 miles of stream. Cooler water temperature in the stream will benefit fisheries.*  
*Cost: \$122,000*

**Goal:** *Another TMDL target is to replace stream channel lost by reducing the 9,100 feet of channel lost by 25% over the next 5 years. By reestablishing meanders, flow velocities will be dissipated during high water events, resulting in decreased erosion and increased channel stability. In addition, habitat conditions for fish will be improved with return to a more natural channel configuration that includes undercut banks. This approach requires determining proper channel geometry configuration based on field data.*

**Goal:** *Another TMDL target is to reduce substrate fines <6.35 mm in substrate cores from 50% to 30% in spawning riffles over the next 5 years. Such a reduction could increase egg-fry survival threefold from the estimated 6 percent to 15 percent. In addition, a reduction in surface fines would be an indicator of improvements in channel and bank stability.*

**Goal:** *Another TMDL target is to address thermal problems in stream X. The target, or goal, is that temperatures not exceed 73 degrees Fahrenheit for more than 10 days per year along the length of the stream.*

**Goal:** *Another TMDL target might address dewatering, establishing goals for not less than 9 cfs in the lower X and upper X reach(es) of stream X, and not less than 3 cfs in reaches X through Z.*

Number tasks in a continuous sequence. For example, under Objective 1, there might be a total of five tasks identified. The next task identified under Objective 2 should be listed starting with Task 6 and followed sequentially. Following this format is necessary, as it will assist the State agency in entering project information into the Grants Tracking System (GRTS).

3.3 Using a format similar to the attached milestone table (Attachment 2), provide a milestone table that lists outputs, quantities and timing of each output, agency(ies) responsible for each task and estimated project milestones listed sequentially for each objective. Interim milestones need to be sufficiently frequent so that problems can be identified and corrected. Milestones should be included for mid-year, annual, and final project reports, and monitoring. Estimated costs for each task should be correlated with the project budget table, Section 6.0.

3.4 When appropriate, identify the necessary environmental permits (e.g., permits under CWA Section 404) required to conduct the project. If a National Pollution Discharge Elimination System permit is needed, justify why it is a NPS project. In areas which it appears that a permit may be needed (e.g., metropolitan or mining areas) and a permit is not identified as being required, provide an explanation.

3.5 Briefly explain why the lead project sponsor is the appropriate entity to coordinate and/or implement the project.

3.6 Describe the plans and roles/responsibilities for assuring proper operation and maintenance (O&M) of §319 funded BMPs. This is to include frequency of on-site O&M evaluations during the life of the BMP, entity to do the evaluations, frequency of on-site O&M reviews with project sponsors by the state/tribe, follow-up procedures with the landowner/user in case there are O&M problems (and the state/tribal role), and actions to be taken if a landowner abandons a §319 funded BMP before the end of the BMP's lifespan. All or part of the above can be covered by written state/tribal procedures, but it needs to be referenced in the proposal.

#### **4.0 COORDINATION PLAN**

4.1 Identify the lead project sponsor, and each cooperating organization. Discuss the responsibilities, roles and commitments assumed by the cooperators and/or contractors in the project planning and implementation. Also state the mode of agreement by which cooperating organizations will interact (e.g., MOU, MOA, contract or informal agreement).

4.2 Describe local support for the project. Include the implementation/linkage to source water assessment and protection programs. Some examples of local support are:

requests from the local landowners, conservation district, or county for the project; results from town meetings; or favorable reactions to the description of proposed project in a local newspaper.

EPA encourages letters of commitment of resources. The State should certify that all the appropriate letters of commitment have been received rather than attaching the support letters to the proposal.

4.3 EPA is concerned that use of 319(h) funds be well coordinated with other pertinent programs. Local project sponsors should obtain from their State NPS coordinator the information needed to address coordination and linkages.

Describe how the project will coordinate with pertinent, 319 and non-319 funded NPS education programs, watershed projects, demonstration sites, and training programs being conducted by other organizations. Other programs and agencies which may have comparable responsibilities and linkages include groundwater programs, drinking water/source water programs, projects conducted by water conservancy districts, water quality and cost share programs assisted by the NRCS, resource restoration projects assisted by the Forest Service and the Bureau of Land Management, and educational activities conducted by the Cooperative Extension Service.

4.4 Describe similar activities that are being undertaken in the watershed. Provide a description of how the proposed project complements the existing project and does not duplicate §319 project activities.

This consideration differs from the coordination issue presented in section 4.3. If 319 funds are being proposed to support activities that are normally the responsibility of other organizations and/or funding sources, provide an explanation justifying the use of NPS funds. EPA is concerned that Section 319 funding not be used to replicate efforts or assume other agencies' responsibilities for activities being carried out in the project watershed.

Examples of other agencies and programs which may be conducting similar activities or producing similar materials are: Information and Education efforts funded by the EPA Pollution Prevention and Environmental Education Programs; projects funded by Clean Water Act 104(b)(3); Cooperative Extension Service; school districts; state water research centers; The Nature Conservancy; universities; and state natural resources or wildlife agencies.

## **5.0 EVALUATION AND MONITORING PLAN**

5.1 It is a priority to the States, Tribes and EPA that data collected under the 319 program be useable and of high quality. Region 8 states and some tribes have EPA-approved Quality Assurance Project Plans (QAPPs) for the nonpoint source program (or separate QAPPs for ground water monitoring and surface water monitoring).

Quality Assurance Project Plans contain the 16 elements required by the EPA Region 8 Quality Assurance Program.

All projects using section 319 funds to collect "environmental data" are required to have a project-specific sampling and analysis plan (SAP). Sampling and Analysis plans must address the 16 elements required of the QAPP, and are approved by the State and EPA. Contact the State or Tribe for specific guidelines on preparing SAPs.

Project sponsors may either reference the State QAPP for the standard operating procedures (SOPs) for each type of monitoring to be performed (e.g., photo points, water sample collection, fish shocking, etc.), or attach them to the SAP. Identify any site-specific amendments required for this project that are not covered by the QAPP. A plan/schedule to develop the appropriate procedures must be identified in the proposal. States and Tribes will approve project-specific SOPs.

The project sponsor has the option of providing the SAP (and SOPs referenced) in this section of the project proposal, or including the development of the SAP and SOPs as project tasks with specific milestone dates. The SAP should reference any applicable information from the project proposal and the State's programmatic QAPP, where applicable, to avoid redundant information.

5.2 Describe the monitoring strategy for the watershed, including goals, objectives, and tasks proposed to evaluate whether the project goals and objectives have been met. Describe sampling and analysis design, (e.g., up-stream/down-stream, paired watersheds, site trend, existing groundwater wells, up-gradient/down-gradient wells, geomorphology and/or riparian measurements, random, systematic, stratified random (e.g., by season or discharge)). and specify parameters to be measured: total suspended sediment, temperature, phosphorous, nitrate, etc.

Locate on a map sampling sites in relationship to BMP applications and priority treatment areas.

5.3 Describe how and when data will be stored, managed and reported. All data collected using §319 funding must be entered into the EPA STORET database (Memorandum of Agreement for Storing Water Quality Data in STORET, October 20, 1998). While the State is responsible for assuring that the data is entered into the database, the project sponsor may do this if they have the capability. The sponsor should contact their State NPS coordinator to find out how to gain access to this database. This requirement should be addressed in this section.

Results from the data analysis should be used to evaluate progress, determine if changes in project/monitoring design need to be considered and assess the overall final project success. Identify organization(s) responsible for project evaluation and specify how the resulting information from the data analysis will be shared and utilized for future projects.

5.4 Describe any models used, if applicable.

5.5 Describe the long-term funding plans for the operation and maintenance (O&M) of restoration activities.

## **6.0 BUDGET**

6.1 Present the project budget in a format similar to the attached budget summary (Attachment 3), indicating the amount and source of all federal and non-federal funds that will be used during each year of the project. The budget table is to include personnel support, BMP and other expenses that are expected to be paid with Section 319 and State and local match sources. Cost by task is not required. The federal fiscal year (October 1-September 30) should be used to discuss and display budget information.

## **7.0 PUBLIC INVOLVEMENT**

7.1 Describe the process for ensuring public involvement in the project.

## SPECIFIC CRITERIA FOR GROUND WATER PROJECTS

There are two categories of project-specific criteria that also will be used in the EPA evaluation process: 1) project suitability; and 2) project proposal content. These criteria emphasize project appropriateness and areas to which special attention should be given as the proposal is developed.

### A. Project Suitability

1. Appropriate activities to be funded for ground water pursuant to CWA Section 319(i)(1) are "research planning, ground water assessments, demonstration programs, enforcement, technical assistance, education and training to protect the quality of ground water and to prevent contamination of ground water from nonpoint sources of pollution."
2. Examples of activities, if identified in the State NPS Management Plan, that are eligible for 319 NPS funding include:
  - a. aquifer vulnerability assessments
  - b. water quality assessments
  - c. source water (surface and/or ground water) or wellhead protection (recharge area mapping, ground water/surface water interactions, monitoring networks, vadose zone monitoring and other activities to facilitate wellhead and source water protection programs)
  - d. agricultural chemical fate and transport
  - e. development of a pollution prevention plan for a specific aquifer
3. source water protection programs (surface and/or ground water)
4. land and/or aquifer areas where most effective and efficient use of limited 319 funds can be achieved;
5. use of a broad range of public and private funding opportunities to supplement 319; and
6. ground water resources that, if contaminated, would pose the most significant human health, welfare, and ecological risks, (e.g., wellhead protection areas, sole source aquifers, source water protection areas, ground water recharge areas, and zones of significant ground water/surface water interaction)
7. Ground water remediation activities are **not** eligible for 319 funding.
8. Ground water research planning projects must have technology transfer potential so the relevant project results can be applied to future projects.
9. The EPA does not want 319 funds to be viewed as the principal source of funds for carrying out a statewide ground water monitoring and assessment program.
10. Collaborative projects are encouraged, but suitable use of 319 funds for the project is required. Section 319 monies may not be appropriate if the activity is a result of another

agency's mandate and/or program (e.g., Farm\*A\*Syst programs; baseline data for state ground water discharge permits; implementation of state ground water protection legislation and baseline compliance monitoring for activities that are approved under a federal, State or local permit such as hog confinement facilities, mining projects and landfills). EPA may be willing to consider supporting other agency training programs subject to need.

11. 319 funds should not duplicate activities that are being funded elsewhere in the EPA. The EPA programs that are available to help fund ground water related activities include CWA Section 106 and 604(b), the pesticide State Management Plans for ground water protection under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), among others.

## **B. Proposal Content**

1. Attention should be given to the most efficient and effective use of funds. For example, it may be more efficient to use 319 funds to help develop an implementation program for ground water protection than to continue collecting data when the problem is already known. The project sponsor and the State have the responsibility to evaluate if the project funds are being applied in the most effective manner to accomplish the project goals.
2. During the planning and formulation of the project, the project sponsor should evaluate the cost-effectiveness of various approaches being considered. Examples of factors that affect cost-effectiveness include: the use of unnecessary overlays for an aquifer vulnerability assessment; vadose zone monitoring versus ground water monitoring; and modification of existing information.
3. Sponsor coordination with the State lead ground water protection agency/task force and other potentially interested parties is an important evaluation factor. Activities regarding NPS ground water contamination will be an integral part of the program as states strive to develop Pesticide State Management Plans and Source Water Protection Programs (SWPP) for ground water protection. Therefore, to assure that the highest state priorities are being addressed, sponsors should coordinate their efforts with the SWPP, the State Pesticides in Ground Water Management Plan, and other state and local ground water plans as applicable.
4. Each proposal needs to describe a well-developed information distribution, or technology transfer, plan. The funding required to carry out this plan may need to be built into the proposal. Interaction and coordination with the state-wide information and education NPS program and other similar programs is important. All data collected using §319 funding must be entered into the EPA STORET database. While the State is responsible for assuring that the data is entered into the database, the project sponsor may do this if they have the capability. The sponsor should contact their State NPS coordinator to find

out how to gain access to this database. This requirement should be addressed in this section.

## FORMAT FOR GROUNDWATER PROJECT PROPOSALS

### 1.0 PROJECT PROPOSAL SUMMARY SHEET

A Project Proposal Summary page will precede each proposal. The format to be followed has been provided (Attachment 1).

### 2.0 STATEMENT OF NEED

2.1 Provide the water quality priority as identified in the most recent 305(b) report, source water assessment, and/or NPS Management Plan. To be considered for funding, groundwater and pesticide projects must be identified as priorities in the State NPS Management Plan. The State NPS Management Plan, in turn, must reference the State Comprehensive Groundwater Management Plan and the Pesticides in Groundwater State Management Plan when they are finalized.

Groundwater demonstration projects (e.g., wellhead protection, abandoned well sealing) need to be submitted as Information and Education Projects.

2.2 Describe the aquifer, and describe the relationship of the aquifer to surface waters in the region. Provide general information on the aquifer region being studied, such as land ownership, land use, soils and pertinent regional geology. Describe the aquifer designated use classification, and discuss to what extent the designated uses of the water resource are being met.

Provide information regarding the water resource that will further aid in understanding the project. Examples are: document the use of the groundwater system being studied as a drinking water supply, discuss the impact of groundwater quality on the consumers or speculate on the consequences if the situation or problem is not addressed.

2.3 Provide maps showing the location and size of the aquifer, including approximate land uses, land ownership and location of the project and important water resources. Include information on the locations of present, past and future groundwater sampling locations, natural springs, possible sources of problems, point sources, and any unique situations that may be important to the project.

2.4 Describe the existing or potential water quality problem(s), listing, as available, the contaminants, historic concentrations ranges (acute/chronic levels) and areal extent of the contamination. Supply information pertinent to the sources, pathways, and timing of the pollution problem. Include any supplemental information that may be relevant to the water quality problem.

For example, for agricultural projects list crop types, irrigation systems, fertilizers and pesticides used, application rates and application schedule.

For urban projects document the type of urban development, acreage of various land uses such as parks, housing, and industrial areas.

For mining projects include the volume, chemistry and location of tailings and mine discharges as well as the groundwater/surface water interactions/relationships.

Include a discussion that describes currently available information, the data sources, and an evaluation/assessment of the accuracy, precision and value of the existing data base.

### 3.0 PROJECT DESCRIPTION

3.1 Describe the goals(s) for the project. Goals are broad statements linked to the project need and are achievable through measurable objectives. Goals may describe, for example, improved understanding of groundwater recharge zones or improved procedures for delineating wellhead or source water protection areas. In addition, goals may include the development of new tools specifying the benefits to be derived in terms of water quality. For information and education activities in groundwater projects, goals may involve changes in public attitudes or awareness of NPS problems as they relate to groundwater quality and/or solutions.

3.2 List and provide a narrative description of each objective and task. Objectives specify in more detail what is to be accomplished to help meet the goal. Each objective should have at least one associated task to be performed to accomplish the objective. Tasks are specific activities that include milestones, outputs, responsible parties, and costs. The cost presented in the narrative section needs to be the total cost for implementation which includes §319 funds plus monies from additional sources.

Following is an example of a format to present goals, objectives and tasks.

***Goal: Assess the presence of nitrogen and pesticides in three priority shallow aquifers to provide information for the Pesticides in Groundwater State Management Plan.***

***Objective 1: Monitor groundwater in the Platte, Sioux and Bear aquifers.***

*Task 1: The Department of Natural Resources will contract with State University to establish the monitoring network. The contract will be issued within two months from the beginning date of the grant.*

<i>Products</i>	- <i>Final contract</i>
<i>Cost</i>	- <i>\$2,000</i>

*Task 2: The contractor will identify 30 monitoring locations and acquire access agreements. Sites will be identified within 6 months of the contract, and the access agreements finalized within 8 months.*

*Products - Areal photo base map identifying the monitoring well locations.*  
*- 30 access agreements*  
*Cost - \$5,000*

*Task 3: The contractor will install nested monitoring wells. Wells will be installed within the first year.*

*Product - 30 completed monitoring wells*  
*Cost - \$25,000*

*Task 4: The contractor will monitor the 30 well sites twice a month for 6 months.*

*Product - Data analysis and report.*  
*Cost - \$30,000*

***Objective 2: Develop a long range plan to establish a permanent state wide monitoring network for the purposes of monitoring contaminants in Groundwater. This activity will take 16 months to complete.***

Include applicable tasks in same format as shown for Objective 1. Number tasks in a continuous sequence. For example, under the previous Objective 1, there were four tasks identified. The next task identified under Objective 2 should be listed starting with Task 5 and followed sequentially. Following this format is necessary, as it will assist the State agency in entering project information into the Grants Tracking System (GRTS).

3.3 Using a format similar to the attached milestone table, provide a project schedule that shows each task, output, quantities and timing of each output, agency(ies) responsible for each task and estimated project duration and milestone listed sequentially for each objective. Interim milestones need to be sufficiently frequent so that problems can be identified and corrected. Show milestones for mid-year, annual, and final project reports, major information and education activities, monitoring, and follow-up operation and maintenance activities if they fall within the specified project period. Estimated costs for each task should be correlated with the project budget table, Section 6.0.

3.4 Briefly explain why the lead project sponsor is the appropriate entity to coordinate and/or carry out the project.

3.5 Describe the plans and roles/responsibilities for assuring proper operation and maintenance (O&M) of any §319-funded BMPs utilized for a ground water project. This is to include frequency of on-site O&M evaluations during the life of the BMP, entity to

do the evaluations, frequency of on-site O&M reviews with project sponsors by the state/tribe, follow-up procedures with the landowner/user in case there are O&M problems (and the state/tribal role), and actions to be taken if a landowner abandons a §319 funded BMP before the end of the BMP's lifespan. All or part of the above can be covered by written state/tribal procedures, referenced in the proposal.

#### **4.0 COORDINATION PLAN**

4.1 Identify the lead project sponsor and each cooperating organization. Discuss the responsibilities, roles and commitments assumed by the cooperators and/or contractors in the project planning and implementation. Also state the mode of agreement by which cooperating organizations will interact (e.g., MOU, MOA, contract or informal agreement).

4.2 Describe local support for the project. Some examples of local support are: requests from the local landowners, conservation district, or county for the project; results from town meetings; or favorable reactions to the description of the proposed project in a local newspaper.

The EPA encourages letters of commitment of resources. The State should certify that all the appropriate letters of commitment have been received rather than attaching the letters to the proposal.

EPA is concerned that use of 319(h) funds be well coordinated with other pertinent programs. Local project sponsors should obtain from their State NPS coordinator the information needed to address coordination and linkages.

4.3 Describe how the project will coordinate with pertinent, 319 and non-319 funded NPS education programs, watershed projects, demonstration sites, and training programs being conducted by other organizations. Other programs and agencies that may have comparable responsibilities and linkages are USGS monitoring, other groundwater programs, drinking water programs, projects conducted by water conservancy districts, regional council of governments, water quality and cost share programs assisted by the NRCS, resource restoration projects assisted by the Forest Service and the Bureau of Land Management, and educational activities conducted by the Cooperative Extension Service.

4.4 Describe similar activities that are being undertaken in the study region. Provide a description of how the proposed project complements the existing project and does not unnecessarily duplicate other 319 project activities.

This consideration differs from the coordination issue presented in section 4.3. If 319 funds are being proposed to support activities that are normally the responsibility of other organizations and/or funding sources, provide an explanation justifying the use of NPS

funds. EPA is concerned that Section 319 funding not be used to replicate efforts or assume other agencies' responsibilities for activities being carried out in the project area.

Examples of other agencies and programs that may be conducting similar activities or producing similar materials are: Information and Education efforts funded by the EPA Pollution Prevention and Environmental Education Programs; projects funded by Clean Water Act 104(b)(3); Cooperative Extension Service; state water research centers; universities; state natural resources or wildlife agencies; and state funded groundwater programs.

## **5.0 EVALUATION AND MONITORING PLAN**

5.1 It is a priority to the States, Tribes and EPA that data collected under the 319 program be useable and of high quality. Region 8 states and some tribes have EPA-approved Quality Assurance Project Plans (QAPPs) for the nonpoint source program (or separate QAPPs for ground water monitoring and surface water monitoring). Quality Assurance Project Plans contain the 16 elements required by the EPA Region 8 Quality Assurance Program.

All projects using section 319 funds to collect "environmental data" are required to have a project-specific sampling and analysis plan (SAP). Sampling and Analysis plans must address the 16 elements required of the QAPP, and are approved by the State and EPA. Contact the State or Tribe for specific guidelines on preparing SAPs.

Project sponsors may either reference the State QAPP for the standard operating procedures (SOPs) for each type of monitoring to be performed (e.g., photo points, water sample collection, fish shocking, etc.), or attach them to the SAP. Identify any site-specific amendments required for this project that are not covered by the QAPP. A plan/schedule to develop the appropriate procedures must be identified in the proposal. States and Tribes will approve project-specific SOPs.

The project sponsor has the option of providing the SAP (and SOPs referenced) in this section of the project proposal, or including the development of the SAP and SOPs as project tasks with specific milestone dates. The SAP should reference any applicable information from the project proposal and the State's programmatic QAPP, where applicable, to avoid redundant information.

5.2 Describe the monitoring strategy for the watershed, including goals, objectives, and tasks proposed to evaluate whether the project goals and objectives have been met. Describe sampling and analysis design and specify parameters to be measured e.g., up-stream/down-stream, paired watersheds, site trend, existing groundwater wells, up-gradient/down-gradient wells, geomorphology and/or riparian measurements, random, systematic, stratified random (e.g., by season or discharge).

Locate on a map sampling sites in relationship to BMP applications and priority treatment areas.

5.3 Describe how and when data will be stored, managed and reported. All data collected using §319 funding must be entered into the EPA STORET database (Memorandum of Agreement for Storing Water Quality Data in Storet, October 20, 1998). While the State is responsible for assuring that the data is entered into the database, the project sponsor may do this if they have the capability. The sponsor should contact their State NPS coordinator to find out how to gain access to this database. This requirement should be addressed in this section.

Results from the data analysis should be used to evaluate progress, determine if changes in project/monitoring design need to be considered and assess the overall final project success. Identify organization(s) responsible for project evaluation and specify how the resulting information from the data analysis will be shared and utilized for future projects.

5.4 Describe any models used, if applicable.

5.5 Describe the long-term funding plans for the operation and maintenance (O&M) of restoration activities.

## **6.0 BUDGET**

6.1 Present the project budget in a format similar to the attached budget summary (Attachment 3), indicating the amount and source of all federal and non-federal funds that will be used during each year of the project. The budget table is to include personnel support, BMP and other expenses that are expected to be paid with Section 319 and State and local match sources. Cost by task is not required.

The federal fiscal year (October 1-September 30) should be used to discuss and display budget information.

## **SPECIFIC CRITERIA FOR INFORMATION AND EDUCATION PROJECTS**

There are two categories of project-specific criteria that also will be used in the EPA evaluation process: 1) project suitability; and 2) project proposal content. These criteria emphasize project appropriateness and areas to which special attention should be given as the proposal is developed.

### **A. Project Suitability**

1. Projects to be funded as information and education activities need to be identified in the NPS Management Plan or the equivalent State information and education strategy (whichever is more current) as stipulated in the Region VIII policy paper. The goal of the project must focus on the identified State NPS Program goals.
2. The project needs to strengthen and/or balance the State NPS information and education program.
3. The project proposal needs to clearly describe the steps taken to coordinate with and involve potentially interested parties in formulating the work plan.
4. Duplication of BMP demonstration projects already funded by other agencies (e.g., abandoned well sealing) should be avoided unless well justified. Multiple demonstration projects which address the same topic should be distributed across the state according to a plan developed by the State. Justification must be provided if a proposed demonstration project is to be located near an existing project or site which addresses the same topic.
5. Collaborative projects are encouraged, but suitable use of 319 NPS funds for the project is required. Section 319 funds may be appropriate when the project meets EPA goals and priorities and the State NPS Management Program goals and priorities. However, Section 319 funds should not be the major funding source if other agencies would be more appropriate sources of funds based on their mandates and programs. Financial support for the primary responsibilities or mandates of other agencies is not an appropriate use of Section 319 funds (e.g., Farm\*A\*Syst programs, training District Conservationists and County Agents in the use of practices included in the USDA Field Office Technical Guide.) EPA may be willing to consider supporting other agency training programs subject to need.
6. The proposal should indicate that a review of existing relevant materials has been made and that these materials do not meet the needs identified by the NPS Management Program document and the proposed project. Currently, the Grants Reporting and Tracking System (GRTS) can be used to search for materials that have been developed nationally by 319 NPS projects and Environmental Education projects.

### **B. Proposal Content**

1. The target audience should be carefully identified and prioritized as to their need (e.g., school children versus landowners). The appropriateness of the medium being used for education and training should be evaluated as the proposal is being developed.
2. The distribution method for the proposed information and education products (e.g., videos, pamphlets, workshops, internet websites) needs to be suitable to ensure maximum distribution to the targeted audience. For example, taking advantage of routinely scheduled activities (e.g., annual meetings, task force meetings, association meetings) to present information and education products may prevent duplication of effort and reach more of the targeted audience rather than developing separate workshops.
3. Attention should be given to the most efficient use of funds. For example, funds may be more efficiently used if an instructor is brought to workshops located in targeted communities rather than sending a large number of participants to one workshop removed from the targeted area. However, EPA is not opposed to supporting lead personnel that are active in NPS activities by providing funding for them to attend conferences or workshops. The project sponsor has the responsibility to determine if the project funds are being applied in the most effective manner to accomplish the project goals.
4. During the planning and formulation of the project, the project sponsor should evaluate the cost-effectiveness of various approaches being considered. Questions such as: the number of people reached; modification of existing information; the location of training sites; distance to similar BMP demonstrations; the relative expense of various BMPs that achieve the same goal; and personnel costs need to be addressed.
5. EPA supports the concepts of holistic resource management and integrated resource management. However, both concepts include educational elements that do not directly relate to environmental issues (such as computerization of farm records, or livestock breed selection). Only the environmental portions of such training are considered eligible for Section 319 funding.
6. Specific justification will be needed if the project intends to: 1) demonstrate established BMPs, some of which have become so wide-spread or cost effective that USDA has reduced or no longer cost shares the practice (e.g., conservation tillage in certain areas of the country); or 2) conduct research to refine established BMPs.

## **FORMAT FOR INFORMATION AND EDUCATION PROJECT PROPOSALS**

### **1.0 PROJECT PROPOSAL SUMMARY SHEET**

A Project Proposal Summary page will precede each proposal. The format to be followed has been provided (Attachment 1).

### **2.0 STATEMENT OF NEED**

2.1 Explain how this project is consistent with water quality priorities that are specified in the State NPS Management Program document or the equivalent State information and education strategy, and why this project is needed to strengthen the State Nonpoint Source program. EPA understands that the link between information and education projects and water quality benefit may be indirect and not immediate. Often it will not be possible to attribute actual changes in water quality to these projects. For example, we will assume that improved public awareness of the NPS problem, evaluated by some indirect measures, will lead to water quality benefits. However, the need for the project should be focused on water quality.

Examples of information and education projects that have been linked to water quality benefits are:

- A newsletter to improve understanding of NPS pollution control or pollution prevention.
- A new video to demonstrate wellhead protection techniques was developed and circulated;
- A better decision-making procedure for attaining or maintaining designated uses has been developed and shown during a pilot project.
- A new CD-ROM with watershed simulation games and state-specific information is being developed for the Region.

#### Demonstration Projects

- A demonstration of nutrient management best management practices (BMPs) in an area where farmers have not used these practices.
- Restoration of degraded stream conditions by using grazing management systems.
- Demonstration of TMDL implementation.

The project proposal should describe the informational void that the project will fill. A needed project will not duplicate other efforts, instead it will enhance previous work by adapting existing materials to a targeted area, create new information/training or the project may continue previous efforts such as a State NPS newsletter. The need statement

should indicate why the approach that is being proposed is the best method to meet the need, e.g., why a video is a better approach to reach the targeted audience than a series of workshops.

Proposals for on-the-ground demonstration projects need to provide information on the existing or potential water quality problems. Specific information on impairment of, and threats to, designated uses, sources, pathways, timing of pollution problems and history of the problems need to be included. Also, information relevant to the type of water quality problem being addressed should be included, for example: irrigated agriculture, animal feeding operations, rangeland, silviculture, construction, urban runoff, resource extraction, hydrologic or habitat modification. The project area should be shown on a map with important details delineated.

2.2 Describe and provide a justification for the selection of the audience being targeted and addressed. Provide information utilizing a targeting method such as: age (e.g., elementary school, adult); location (e.g., statewide, watershed); association (e.g., private land owners, trade organizations); and current knowledge base (e.g., aware but needs details, needs new methods).

### **3.0 PROJECT DESCRIPTION**

3.1 Describe the goals(s) for the project. Goals are broad statements linked to the project need and are achievable through measurable objectives. Goals may describe for example, changes in public attitudes or awareness of NPS problems and solutions; BMPs to be demonstrated and why; new tools to be developed and for whom; and the benefits to be derived in terms of water quality.

3.2 List and provide a narrative description of each objective and task. Objectives specify in more detail what is to be accomplished to help meet the goal, (e.g., educate the state legislators that represent areas having populations of greater than 50,000 regarding the sources and impacts of urban NPS pollution; reduce nutrient contributions from 10 animal feeding operations of 50-300 head of cattle in Weld and Larimer Counties).

Each objective should have at least one associated task to be performed to accomplish the objective. Tasks are specific activities that include milestones, outputs, responsible parties, and costs. The costs presented in this section should be the total cost for each task, including §319, and all other sources of funding.

**Following is an example of the format to present goals, objectives and tasks.**

#### 3.1 Goal

*The goal of this project is to implement a comprehensive media campaign and supporting activities that will increase the awareness of the general public in Colorado about the causes and solutions to urban polluted runoff. This project will partially achieve all of the goals set*

forth in the Draft White Paper of the Information/Education subcommittee of the Nonpoint Task Force. It will fully achieve Goal Three of that document, which is to “proactively engage in public information relating to NPS issues.” This project also will accomplish the first goal of the Urban/Construction Subcommittee — to educate the general public in urban areas about nonpoint source pollution.

This campaign will include basic information about urban runoff covering such topics as what behaviors lead to polluted runoff and how polluted runoff affects Colorado’s water resources. Targeted audiences will be informed about the role of storm sewers in polluted runoff; what they are, what they do, and where they lead. A small number of easily-understood, highly-focused messages will provide non-technical, easily implemented solutions to the household-generated urban runoff problem. Consistency of the message will be maintained through the use of recognizable logos and graphics throughout the campaign. This project will provide baseline data about the public’s awareness of household polluted runoff through the survey and will establish an ongoing, easily accessible clearinghouse of nonpoint source information.

### 3.2 Objectives

One of the overriding objectives of this project is to develop a statewide educational effort. To deliver this program to all parts of the state, volunteers from fifteen of the local Leagues of Women Voters in Colorado will be recruited to work in their communities. Local project managers will be designated to coordinate activities in each community. Training will be given to local project managers and volunteers. Stipends will be given to participating local Leagues to cover administrative expenses, such as office rent, utilities, equipment, supplies postage and administrative costs, and to provide an incentive to participate fully in the project.

The use of local Leagues will develop a cooperative working relationship with individuals, entities and agencies across the state to coordinate and advance the dissemination of information about urban polluted runoff. These relationships will create an infrastructure of interested organizations on which future partnership efforts can be based. Local League involvement will ensure that local programs implemented through this project reflect the cultural diversity represented within communities throughout the state.

The League’s commitment to urban polluted runoff educational efforts will continue beyond the two year grant period. The use of League volunteers will persist with the continuation, as appropriate of local community projects. Funds will be solicited from other organizations to maintain the nonpoint source information clearinghouse, the toll-free number and the home page after the initial project is completed. Again, League volunteers will be recruited to staff the clearinghouse.

**Objective 1    *Develop an assessment tool to determine current levels of awareness about urban polluted runoff.***

*Task 1    Contact colleges and universities about working with a graduate student or intern. Identify a student to compile data on existing assessment tools and develop pre- and post- surveys for this project. Work with the student and faculty advisor to develop an assessment tool and a procedure for conducting the survey. Assemble an*

*advisory committee to evaluate the accuracy and usefulness of the survey as well as provide advice on the technical merit of the project. Evaluate the assessment tool. Tabulate the results of the survey with the student. Publish the results of the survey and notify interested parties of its availability.*

*Product Pre- and post-survey instrument, survey results, accurate assessment of current public awareness of urban polluted runoff.*

*Estimated Cost \$8,200.00 ----- \$2,000 - 319 Grant, \$6,200 - In-kind match (Assessment development, student intern, advisory committee, administration, management and overhead)*

*Task 2 Create a network of local League volunteers to administer the survey. Provide training for local League project managers and volunteers. Use local League volunteers to administer the survey through a telephone poll.*

*Product A network of local League volunteers, survey results, accurate assessment of current public awareness of urban polluted runoff.*

*Estimated Cost \$21,000.00 — \$7,200 - 319 Grant, \$13,800 - In-kind match (Local League volunteers, student intern, local League stipend, travel expenses, administration, management and overhead).*

**Objective 2 *Develop and conduct a comprehensive urban polluted runoff media campaign***

In subsequent objectives, include applicable tasks in same format as shown for Objective 1. Number tasks in a continuous sequence. For example, under the previous Objective 1, there were two tasks identified. The next task identified under Objective 2 should be listed starting with Task 3 and followed sequentially. Following this format is necessary, as it will assist the State agency in entering project information into the Grants Tracking System.

3.3 Using a format similar to the attached milestone table, provide a project schedule that shows each task, output, quantities and timing of each output, agency(ies) responsible for each task and estimated project duration and milestone listed sequentially for each objective. Interim milestones need to be sufficiently frequent so that problems can be identified and corrected. Show milestones for mid-year, annual, and final project reports, and monitoring. Estimated costs for each task should be correlated with the project budget table, Section 6.0.

3.4 Briefly explain why the lead project sponsor is the appropriate entity to coordinate and/or carry out the project.

3.5 Describe the plans and roles/responsibilities for assuring proper operation and maintenance (O&M) of §319 funded BMPs. This is to include frequency of on-site O&M evaluations during the life of the BMP, entity to do the evaluations, frequency of on-site O&M reviews with project sponsors by the state/tribe, follow-up procedures with the landowner/user in case there are O&M problems (and the state/tribe role), and actions to be taken if a landowner abandons a §319 funded BMP before the end of the BMP's lifespan. All or part of the above can be covered by written state/tribal procedures, but it needs to be referenced in the proposal.

#### **4.0 COORDINATION PLAN**

4.1 Identify the lead project sponsor and each cooperating organization. Discuss the responsibilities, roles and commitments assumed by the cooperators and/or contractors in the project planning and implementation. Also state the mode of agreement by which cooperating organizations will interact (e.g., MOU, MOA, contract or informal agreement).

4.2 Describe local support for the project. Some examples of local support are: requests from the local landowners, conservation district, or county for the project; results from town meetings; or favorable reactions to the description of the proposed project in a local newspaper.

The EPA encourages letters of commitment of resources. The State should certify that all the appropriate letters of commitment have been received rather than attaching the letters to the proposal.

EPA is concerned that use of 319(h) funds be well coordinated with other pertinent programs. Local project sponsors should obtain from their State NPS coordinator the information needed to address coordination and linkages.

4.3 Describe how the project will coordinate with pertinent, 319 and non-319 funded NPS education programs, watershed projects, demonstration sites, and training programs being conducted by other organizations. Other programs and agencies that may have comparable responsibilities and linkages are, USGS monitoring, other groundwater programs, drinking water programs, source water protection programs, projects conducted by water conservancy districts, regional council of governments, water quality and cost share programs assisted by the NRCS, resource restoration projects assisted by the Forest Service and the Bureau of Land Management, and educational activities conducted by the Cooperative Extension Service.

4.4 Describe similar activities that are being undertaken in the study region. Provide a description of how the proposed project complements the existing project and does not unnecessarily duplicate other 319 project activities.

This consideration differs from the coordination issue presented in section 4.3. If 319 funds are being proposed to support activities that are normally the responsibility of other organizations and/or funding sources, provide an explanation justifying the use of NPS funds. EPA is concerned that Section 319 funding not be used to replicate efforts or assume other agencies' responsibilities for activities being carried out in the project area.

Examples of other agencies and programs that may be conducting similar activities or producing similar materials are: Information and Education efforts funded by the EPA Pollution Prevention and Environmental Education Programs; projects funded by Clean Water Act 104(b)(3); Cooperative Extension Service; state water research centers; universities; state natural resources or wildlife agencies; and state funded groundwater programs.

## **5.0 EVALUATION AND MONITORING PLAN**

5.1 Describe the plans for evaluating how well the project goals, objectives and tasks have been met. When appropriate, the plan should describe how changes in behavior as a result of the project will be evaluated. Include the different types of evaluation tools to be used, such as recording requests for NPS newspapers and videos, exit and follow-up surveys for training courses, and reader surveys. Include the entity(ies) responsible for the evaluations. Identify how the results from monitoring and evaluation will be used to assist in developing future projects.

5.2 For demonstration projects, monitoring should be considered for determining project effectiveness (direct water quality and/or surrogate methods). Examples of demonstration projects for which monitoring should be considered would be animal waste facilities, remediation of hydrologic modification impacts, wetland detention basins, and TMDL implementation.

5.3 For those demonstration projects where monitoring will occur, it is a priority for the States, Tribes and EPA that data collected under the 319 program be useable and of high quality. Region 8 states and some tribes have EPA-approved Quality Assurance Project Plans (QAPPs) for the nonpoint source program (or separate QAPPs for ground water monitoring and surface water monitoring). Quality Assurance Project Plans contain the 16 elements required by the EPA Region 8 Quality Assurance Program.

All projects using section 319 funds to collect "environmental data" are required to have a project-specific sampling and analysis plan (SAP). Sampling and Analysis plans must address the 16 elements required of the QAPP, and are approved by the State and EPA. Contact the State or Tribe for specific guidelines on preparing SAPs.

Project sponsors may either reference the State QAPP for the standard operating procedures (SOPs) for each type of monitoring to be performed (e.g., photo points, water sample collection, fish shocking, etc.), or attach them to the SAP. Identify any site-specific amendments required for this project that are not covered by the QAPP. A

plan/schedule to develop the appropriate procedures must be identified in the proposal. States and Tribes will approve project-specific SOPs.

The project sponsor has the option of providing the SAP (and SOPs referenced) in this section of the project proposal, or including the development of the SAP and SOPs as project tasks with specific milestone dates. The SAP should reference any applicable information from the project proposal and the State's programmatic QAPP, where applicable, to avoid redundant information.

5.4 Describe the monitoring strategy for the demonstration project, including goals, objectives, and tasks proposed to evaluate whether project goals and objectives have been met. Describe sampling and analysis design and specify parameters to be measured e.g., up-stream/down-stream, paired watersheds, site trend, existing groundwater wells, up-gradient/down-gradient wells, geomorphology and/or riparian measurements, random, systematic, stratified random (e.g., by season or discharge).

Locate on a map sampling sites in relationship to BMP applications and priority treatment areas.

5.5 Describe how and when data will be stored, managed and reported. All data collected using §319 funding must be entered into the EPA STORET database (Memorandum of Agreement for Storing Water Quality Data in STORET, October 20, 1998). While the State is responsible for assuring that the data is entered into the database, the project sponsor may do this if they have the capability. The sponsor should contact their State NPS coordinator to find out how to gain access to this database. This requirement should be addressed in this section.

5.6 Describe any models used, if applicable.

5.7 Describe the long-term funding plans for the operation and maintenance (O&M) of restoration activities.

## **6.0 BUDGET**

6.1 Present the project budget in the format provided (Attachment 3). Part 1 should indicate the amount and source of all federal and non-federal funds that will be used during each year of the project. The budget table is to include personnel support, BMP and other expenses that are expected to be paid with Section 319 and State and local match sources. Cost by task will not be required. The federal fiscal year (October 1-September 30) should be used to discuss and display budget information.

**ATTACHMENT 1: Project Proposal Summary Sheet**

**NPS PROJECT SUMMARY SHEET**

AWARD FISCAL YEAR: PROJECT TITLE:

NAME:  
ADDRESS:

CITY: ZIP CODE:  
PHONE: FAX: EMAIL:

LATITUDE – DEGREE: LATITUDE – MINUTES:  
LONGITUDE – DEGREE: LONGITUDE – MINUTES:

WATERSHED NAME:  
HYDROLOGIC UNIT CODE (HUC):  
HIGH PRIORITY WATERSHED? Y/N POLLUTANT TYPE:  
UWA CATEGORY:

TMDL DEVELOPMENT? Y/N TMDL IMPLEMENTATION? Y/N  
TMDL PRIORITY (High, Medium, Low):  
WATERBODY TYPES:  
ECOREGION:

PROJECT CATEGORY:

PROJECT FUNCTIONAL CATEGORY:

GROUNDWATER PROJECT? Y/N

FY 319(H) FUNDS REQUESTED (base): MATCHING FUNDS:  
FY 319(H) FUNDS REQUESTED (Incremental): BUDGET 319 TOTAL:  
§319 Funded Full Time Personnel:

GOALS:

PROJECT DESCRIPTION:

**ATTACHMENT 2: Milestone Table**

**MILESTONE TABLE FOR WET CREEK WATERSHED PROJECT  
(COMPLETED FOR OBJECTIVE 1 ONLY)**

TASK/RESPONSIBLE ORGANIZATIONS	OUTPUT	Q T Y	YEAR 1			YEAR 2			YEAR 3				
			01/94	12/94	01/95	12/95	01/96	12/96	01/97	12/97	01/98	12/98	
<b>OBJECTIVE 1</b>													
Task 1 - Complete rangeland and pasture condition inventories. Group 1, 3, 4	Narrative inventory descriptions Aerial photography mapping Management plans	1 1 8											
Task 2 - Develop rangeland and pasture management plans. Group 1, 2, 3, 4													
Task 3 - Implementation of BMPs. Group 1, 2, 3, 4	Refer to Budget table for planned BMP types, and quantities, and costs.												

Group 1 - Natural Resources Conservation Service - Provide technical assistance to plan, design, and implement BMPs.  
 Group 2 - Landowners in Wet Creek drainage - Make land management decisions and provide cash and in-kind match for BMPs.  
 Group 3 - Resource Conservation District - Local project manager and sponsor, including responsibilities for project coordination, reimbursement payments, match tracking, and progress reporting to the State DEQ.  
 Group 4 - State Department of Environmental Quality - Statewide Section 319 program management including oversight of local 319 planning and expenditures.

**ATTACHMENT 3: Budget Table**

**BUDGET TABLE Example FOR WET CREEK WATERSHED PROJECT**

PART 1: FUNDING SOURCES	96	97	98	TOTAL
<b>EPA SECTION 319 FUNDS</b>				
1) FY96 Funds (FA)	\$ 26,633	\$46,583	\$34,584	\$107,800
Subtotals	\$26,633	\$46,583	\$34,584	\$107,800
<b>OTHER FEDERAL FUNDS</b>				
1) NRCS (TA&FA)	\$36,500	\$2,500	\$2,500	\$41,500
2) CFSA (FA-ACP)				
3) BLM (TA)	\$0	\$8,000	\$8,000	\$16,000
4) BLM (FA)	\$2,000	\$1,000	\$1,000	\$4,000
5) USFWS (TA)	\$1,000	\$2,000	\$2,000	\$5,000
Subtotals	\$1,000	\$0	\$1,000	\$2,000
	\$40,500	\$13,500	\$14,500	\$68,500
<b>STATE/LOCAL MATCH</b>				
1) Game & Fish Dept. (FA)	\$1,000	\$1,000	\$1,000	\$3,000
2) Local SCD (TA&FA)	\$7,633	\$7,633	\$7,634	\$22,900
3) Landowners (FA)	\$8,000	\$20,000	\$11,800	\$39,800
4) Cooperative Extension (TA&FA)	\$4,000	\$3,000	\$3,000	\$10,000
5) State DEQ	\$500	\$1,000	\$500	\$2,000
Subtotals	\$21,133	\$32,633	\$23,934	\$77,700
<b>TOTAL BUDGET</b>	<b>\$88,266</b>	<b>\$92,716</b>	<b>\$73,018</b>	<b>\$254,000</b>

FA: Financial Assistance  
 SCD: Soil Conservation District  
 TA: Technical Assistance  
 DEQ: Department of Environmental Quality  
 NRCS: Natural Resources Conservation Service  
 USFWS: U.S. Fish and Wildlife Service  
 CFSA: Consolidated Farm Services Agency  
 BLM: Bureau of Land Management

**WET CREEK WATERSHED PROJECT BUDGET**  
**Part 2 - Funding**

Section 319/Non-federal Budget	'96	'97	'98	TOTAL COSTS	Cash Match*	In-kind Match*	§319 Funds
<b>PERSONNEL/SUPPORT</b>							
1) Salary/Fringe	\$11,400	\$12,600	\$13,700	\$37,700	\$10,000	\$ 0	\$ 25,700
2) Office Rent/Utilities	2,000	2,000	2,000	6,000	0	6,000	0
3) Travel	2,000	2,000	2,000	6,000	0	0	6,000
4) Equipment/Supplies	1,000	500	500	2,000	1,000	1,000	0
5) Training	200	200	100	500	0	100	400
6) Telephone	200	200	200	600	0	600	0
Subtotals	<u>\$ 16,800</u>	<u>\$ 17,500</u>	<u>\$ 18,500</u>	<u>\$ 52,800</u>	<u>\$ 11,000</u>	<u>\$ 7,700</u>	<u>\$ 32,100</u>
<b>OBJECTIVE 1: <u>Apply Grazing Management Practices</u></b>							
- Range Management Systems	\$ 10,000	\$ 30,000	\$ 14,000	\$ 54,000	\$ 14,000	\$ 8,800	\$ 32,400
- Pasture Management Systems	10,000	30,000	13,000	53,000	13,000	7,000	31,800
Subtotals	<u>\$ 20,000</u>	<u>\$ 60,000</u>	<u>\$ 27,000</u>	<u>\$107,000</u>	<u>\$ 27,000</u>	<u>\$ 15,800</u>	<u>\$ 64,200</u>
<b>OBJECTIVE 2: <u>Information/Education</u></b>							
Newsletter/Video	\$ 4,000	\$ 3,000	\$ 3,000	\$ 10,000	\$ 4,500	\$ 4,500	\$ 1,000
Tours	500	500	500	1,500	500	500	500
Subtotals	<u>\$ 4,500</u>	<u>\$ 3,500</u>	<u>\$ 3,500</u>	<u>\$ 11,500</u>	<u>\$ 5,000</u>	<u>\$ 5,000</u>	<u>\$ 1,500</u>
<b>OBJECTIVE 3: <u>Monitoring</u></b>							
Sample Transportation	\$ 2,000	\$ 2,000	\$ 2,000	\$ 6,000	\$ 1,000	\$ 1,000	\$ 4,000
Sample Analysis	2,000	2,000	2,000	6,000	0	0	6,000
Subtotals	<u>\$ 4,000</u>	<u>\$ 4,000</u>	<u>\$ 4,000</u>	<u>\$ 12,000</u>	<u>\$ 1,000</u>	<u>\$ 1,000</u>	<u>\$ 10,000</u>
<b>ADMINISTRATIVE</b>							
Secretary	\$ 1,000	\$ 1,000	\$ 1,000	\$ 3,000	\$ 3,000	\$ 0	\$ 0
SCD/Coordination Meetings	400	400	400	1,200	200	1,000	0
Subtotals	<u>\$ 1,400</u>	<u>\$ 1,400</u>	<u>\$ 1,400</u>	<u>\$ 4,200</u>	<u>\$ 3,200</u>	<u>\$ 1,000</u>	<u>0</u>
<b>TOTAL 319/NON-FEDERAL BUDGET</b>	<u>\$ 46,700</u>	<u>\$ 86,400</u>	<u>\$ 55,400</u>	<u>\$187,500</u>	<u>\$ 47,200</u>	<u>\$ 30,500</u>	<u>\$107,800</u>

\* Includes match from both State and local sources