

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
1. Project Grants	1. Purpose	Final stages of completing the update to the Montana Drought Management Plan (Plan), and one of the major recommendations is to “Incorporate drought resilience measures into existing state programs.” We are excited about the potential opportunities for achieving this through the RRG Program, and we encourage RRG staff to leverage programs in a way that encourages local entities to build drought resilience.	Thank you. The Reclamation Development Grant Program under Crucial State Need has established a category of grants specifically designed to incorporate drought resiliance measures and will fund projects under the drought plan.	Coordination with RDG
1. Project Grants	2. Eligible Applicants	Currently watershed groups and other community-based conservation groups are facing a grant writing climate that requires government or government agency sponsorship prior to applying for funds -or requires government sponsorship to avoid match requirements. We view this as an unreasonable requirement for RRG grants collectively for a number of reasons, first and foremost being a concern that when local governments or agency personnel do not have the capacity to sponsor grants, it may jeopardize the project or watershed group’s capacity to move forward at all. MCA 85-1-602 does not appear to limit entities eligible to apply to RRG grants. When governments or agencies are required to sponsor and sponsor “in name only,” small nonprofits and watershed groups are strapped with all of the grant administration, reporting, and oversight costs. This results in inefficiencies and inequities, because the local government is receiving the administrative allocation, but the nonprofit is doing the work and has to pay for administration with other funding.	MCA 85-1-605 restricts project grants, planning grants and emergency grants to state, local or tribal governments. The other grant programs within RRG, watershed groups and other community based conservation groups are eligible if they meet the definition in ARM 36.17.607. 2) "Applicant" means the following who submit an application under the act, meeting the purposes and policies of the act pursuant to 85-1-601, MCA: (a) a local governmental or state governmental entity eligible under 85-1-605, MCA; (b) a tribal government eligible under 85-1-605, MCA; or (c) a private person that is an individual, association, partnership, corporation, or other governmental entity that is not eligible for loans and grants under 85-1-605, MCA.  To clarify further MCA 85-1-602 states the objectives of the grant program.	Final Guidelines
1. Project Grants	2. Eligible Applicants	Requiring government entities to sponsor grants is also potentially duplicative when it comes to financial administration tasks, a poor use of any staff person’s time. Heightening the appearance of inequities in distributing RRG funds, we are concerned that Tribal governments have not been involved in the RRG Stakeholder group, when they are eligible for most RRG funding. We request the RRG group to be expanded to include Tribal governments and Tribal natural resources staff if they have not been invited. Additional considerations when requiring local government sponsorship (or local government sponsorship to avoid a required match) include:	DNRC does not "Require" sponsorship from an eligible local government, that is an option for ineligible entities to partner to fund eligible projects.  Tribal governments in irrigation as well as infrastructure were invited to participate as stakeholders in the RRG Stakeholder Process.	
1. Project Grants	2. Eligible Applicants	Municipal boundaries do not necessarily align with watershed or other geographic boundaries or watershed natural resources challenges and local governments may be reluctant to engage in planning processes or sponsor grants outside of their administrative boundaries. Watershed groups and other conservation nonprofits on the other hand, DO follow watershed boundaries and can work across administration boundaries with multiple local governments, based on watershed boundaries and resource challenge needs.	Thank you for the comment.	
1. Project Grants	2. Eligible Applicants	Non-government entities often have the staff expertise to design, research, and assess restoration, stormwater, or other water project needs when it comes to the scale of projects supportable by RRG – Project Grant (i.e limited to \$125,000).	Often times project costs exceed the amount of funds that DNRC has available for projects. Those costs, such as partner organization staff, may be included as match in the application for DNRC grants.	

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1. Project Grants	2. Eligible Applicants	The breadth and availability of new federal funds currently outweigh the capacity of local governments to deliver on-the-ground projects, and there is no assurance that there will be local government demand for the available state funding. On the contrary, most non-government or nonprofit entities are constantly in need of available funding for both project planning and project execution.	DNRC project grants and others may reimburse eligible expenses associated with contracted services for grant and project management.	
1. Project Grants	3. Eligible Projects	A simple way to incorporate drought resilience into the RRG framework is to explicitly identify possible projects in the list of examples within each program's guidelines. Many people do not think to look at the type of projects specified in MCA, so offering more inclusive examples of previously funded and/or eligible projects in the program guidelines could expand the types of proposed projects. Examples and suggestions follow. RRG Project Grants i. Natural storage	Under the RRG Program objectives, it defines projects eligible for grants that enhance renewable resources to include but are not limited to... "development of natural, offstream, and tributary storage. RRG project examples include those types of projects the program typically receives from applicants which go by industry standard names, and a project type "Natural storage" while being valid is not a traditional project type, however "natural storage" may be considered in ranking as a renewable resource benefit.  This comment will be shared with the Reclamation Development Grant Program. The Reclamation Development Grant Program under Crucial State Need has established a category of grants specifically designed to incorporate drought resilience measures and will fund projects under the drought plan.	Coordination with RDG
1. Project Grants	4. Eligible Expenses	Administrative time documentation. What is the best way for Administrators to submit this information. While there have been sample timecard templates shared among Administrators, is there a specific "look" or accounting process administrators should be using for this? Does the administrative time include grant preparation before grant award or focus just on administrative time for grant execution once awarded.	DNRC will provide the guidance document: DNRC CARDD Grant Reimbursement for Personnel Expenses <a href="https://dnrc.mt.gov/_docs/conservation/CARDD-Training/DNRC-Reimbursement-for-Personnel-Services-Guide-Final.pdf">https://dnrc.mt.gov/_docs/conservation/CARDD-Training/DNRC-Reimbursement-for-Personnel-Services-Guide-Final.pdf</a> at application and grant management phases.	Application Grant Administration Manual.

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1. Project Grants	4. Eligible Expenses	<p>There are 11 references to "contracted services" in this draft being eligible expenses. Less clear is whether in kind or in house services will be eligible. Referring to ineligible expenses in the draft it is not clear how in kind or in house costs are treated- ☐ Program Costs aka indirect costs: .....salaries of existing fully funded staff positions unless the workhours associated with the project are accounted for.</p> <p>Clarity is necessary for this situation.</p> <p>This is Montana. Many of us in Agriculture are quite capable of engineering or constructing the projects that we would apply for in these grants. I am in favor of allowing cost share or reimbursement of direct expenses to the grant recipient as long as hard costs can be accounted for.</p>	<p>DNRC will provide the guidance document: Guidelines for Grant Funded Construction Projects - Non-DEQ Regulated which provides details on the state requirements for irrigation, restoration and stormwater type projects. This will be provided during application and grant management.  <a href="https://dnrc.mt.gov/_docs/conservation/ARPA/Tools-and-Resources/Non-DEQ-Project-Guidelines-FINAL.pdf">https://dnrc.mt.gov/_docs/conservation/ARPA/Tools-and-Resources/Non-DEQ-Project-Guidelines-FINAL.pdf</a></p> <p>The State of Montana requires that projects must be designed and inspected during construction by a Montana registered engineer and all land surveying projects must be performed by a Montana registered land surveyor Montana Code Annotated (MCA) 18-2-121.</p> <p>Local Government Provides Labor and Equipment for Construction. Local governments must request authorization to use their own labor and equipment for construction projects.</p> <p>Common types of these projects are canal/ditch conversion to pipe and canal lining.</p> <ul style="list-style-type: none"> <li>• Procurement of materials must follow federal, state and/or local procurement laws, rules, and regulations.</li> <li>• The entity must provide DNRC with documentation of similar projects constructed or must provide DNRC with the manpower and machinery available to complete the construction according to plans and specifications.</li> <li>• Accurate expense records of labor and machinery used for construction must be kept and provided to DNRC for reimbursement.</li> <li>• A licensed engineer or surveyor registered in Montana must be present for inspection and completion of the project (MCA 18-2-121).</li> <li>• DNRC requires As-Builts that are certified by a licensed P.E. as part of the Final Reporting Requirements.</li> </ul>	Application Grant Administration Manual.
1. Project Grants	5. Grant Limits	Both of our organizations would be interested in a long-term discussion (beyond the scope of this document) about the award cap of \$125,000 given modern funding challenges and costs associated with projects. We acknowledge the tradeoffs with increasing the size of the awards (i.e., fewer awards made), but we do believe that it is a worthwhile conversation in the future with the Department, Governor's Office, and legislature. We do agree that projects are most durable when they rely on diverse funding, so our intention here is simply to address inflationary pressures rather than to seek a one stop funding shop for our work.	Thank you for your comment. DNRC understands this request and is willing to engage in this discussion outside of the RRG Stakeholder Group process.	
1. Project Grants	6. Match	Is there any ability to add a prioritization for projects that need the RRG funds to ensure non-federal match for another grant?	DNRC will consider this during the project application drafting and ranking process.	Application
1. Project Grants	8. How to Apply	Could all applications use the Uniform Application and skip the non-relevant sections?	DNRC will look at this during the project application drafting process.	Application

## RRG Stakeholder Comment Summary Matrix

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1. Project Grants	8. How to Apply	Please separate the grant application forms from the loan application forms in regards to the financial disclosure required . I have looked at two different grants for water/irrigation projects and both times the disclosure was unreasonable for a family ranch. I have inquired several times about this and have been told repeatedly that the requirement for full financials, including land and livestock values, must be included because the programs are combined and must go through the same review as a bank loan. Montana has strong public record laws, once the state receives my full financials, anyone can request them. Again, this makes it unrealistic for me to submit that information to the state.	Loan application requirements are outside the scope of this stakeholder group purpose. The comment was forwarded to the RRGL Private Loan program manager.	
1. Project Grants	8. How to Apply	Is a PER / Technical Memo required – there is reference to technical and financial feasibility, but no specific reference to a PER or Technical Memo? Requiring those pieces is not a bad deal, however some entities may have the ability to develop those with in house staff / expertise and not through contracted services.	While a PER/Technical Memo is not required, the technical narrative portion of the RRG application as well as the technical and financial feasibility would not be able to be completed without one or both of those documents.	
1. Project Grants	8. How to Apply	We would appreciate clarification for what the footnote is intended to qualify in the table on page 3 related to “Infrastructure, State and Federal Match1”.	That is a typo. However, often times RRG grants are used to provide match for other infrastructure funding programs such as State Revolving Fund, USDA Rural Development, WRDA. Other federal programs may require non-federal match, which the RRGL Grants regularly satisfy.	Final Guidelines
1. Project Grants	8. How to Apply	During the review of these processes, have the Department’s staff and the stakeholders taken efforts to identify, combine, or reduce sections in the Project Grant applications? There are duplicative sections and opportunities to reduce the grant proposal burden on both applicants and Department staff reviewers. We can provide specific examples if that is helpful.	DNRC will look at this during the project application drafting process.	Application
1. Project Grants	8. How to Apply	Question: do applications have to be received or postmarked by May 15?	Hard copy applications must be post marked by the deadline.	Application
1. Project Grants	9. Ranking	“It was mentioned that there is consideration of separating infrastructure from irrigation. Can you explain what "separating" might entail?”	DNRC intends to draft application questions that are better targeted to the project types we receive in RRGL and subsequently draft ranking criteria that match project types. Important to clarify here, DNRC's ranking is set out in the Administrative Rules of Montana and each project type would be afforded the opportunity to achieve the same maximum score so that one project type will not receive preference over the other.	Application Ranking
1. Project Grants	9. Ranking	Our organizations support the effort to separate the ranking of irrigation and infrastructure projects as a change to the program (pg. 3).	Thank you.	Application Ranking
1. Project Grants	9. Ranking	It would be nice if grants could be awarded between the sessions. ARPA with the interim infrastructure committee was a great way to keep projects going forward between sessions. I know this was addressed in the feedback from meeting one – but if possible this would be great.	Required by MCA 85-1-605 for RRG Project Grants. Not required for small grant programs.	
1. Project Grants	10. Grant Management	Redundancy between the application and the startup conditions, for example if on format was used in both the application and startup related to budget it would make it simpler and more consistent. I don't see any reason the budget tracking worksheet can't be part of the application – it may help the applicant understand some of the grant management requirements before they apply.	DNRC will consider using the Uniform Budget Tracker in both application and startup.	Application Grant Administration Manual.

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1. Project Grants	10. Grant Management	On page 4 in Grant Management, we would appreciate if the Department would provide an expected schedule after the grant award (i.e., notice of award, contract development, grant execution, money available, etc.). This would help applicants develop their project schedule within the application.	DNRC will attempt to estimate the schedule of grant awards. However, some grant awards are dependant on the revenue generated in the account and it can be unpredictable.	Award Letters
1. Project Grants	10. Grant Management	Grant reporting requirements and templates should be provided in the grant applications so that applicants can adequately estimate administration/project management burden when applying. Knowing exactly what will be required will assist with estimating project administration/management time.	DNRC will provide access to progress report templates as well as reimbursement requirements as part of the application. Procurement documents are required for all grants prior to reimbursement.	Application Grant Administration Manual.
1. Project Grants	10. Grant Management	Projecting time to do grant reporting and other qualifying administrative tasks are proposed as part of the grant application. There is also a requirement to show documentation to support administrative tasks prior to reimbursement. Please provide CD administrators specific grant reporting requirements and provide templates in the grant application so Administrators can adequately estimate administrative fees. Administrators need clarity of what DNRC will require exactly, otherwise many CDs will underestimate the amount of time required for the grant process.	DNRC will provide access to progress report templates as well as reimbursement requirements as part of the application. Procurement documents are required for all grants prior to reimbursement.	Application Grant Administration Manual.
1. Project Grants	10. Grant Management	The final project report could benefit from some streamlining.	DNRC is looking into opportunities to streamline or at least provide additional guidance to streamline this process for grantees.	Grant Administration Manual. Final Report.
1. Project Grants	10. Reimbursement	Would like to see the eligible project expenses from the date of grant award, not the grant execution date.	DNRC plans to incorporate this comment into it's grant guidelines for project grants.	Application Grant Administration Manual.
1. Project Grants	11. Outreach	Is there an outreach plan for this program?	DNRC will address an outreach plan as part of its RRG final guidelines.	Final Guidelines

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2. Planning	3. Eligible Projects	Watershed Restoration Plans: Working with local governments is hard, dissimilar boundaries, unwillingness. Watershed groups don't qualify for planning grants.	<p>DNRC has created an opportunity for local governments to apply for a grant to obtain contracted technical services for WRPs. WRPs have always been eligible under the RRG Planning Grant Program, but DNRC feels that specifically calling out this opportunity will help local groups obtain funds for contracted services necessary to complete WRPs. Additionally, local governments applying for WRPs in Planning Grants will not have to provide match, and those grant funds for contracted services can support local watershed group program efforts.</p> <p>DNRC has seen unrepresented collaboration between local governments and local groups through its grant programs in the last few years that has bolstered relationships as well as added capacity to small organizations. By creating an opportunity to expand access to grant programs through tools like MOUs and other agreements, local groups and local governments can support each other where projects and missions overlap.</p> <p>Furthermore, DNRC is interested in becoming a partner on creating a model framework or templates for agreements to clarify the roles and responsibilities between local governments and local groups they sponsor to enable this collaboration.</p> <p>Funding for contracted services to prepare WRPs have been specifically defined as eligible under Planning Grants to help provide financial assistance to hire contracted technical service providers to prepare a WRP. Grant funding for watershed groups or other local groups staff time is eligible under Watershed Management Grants.</p>	Final Guidelines
2. Planning	3. Eligible Projects	<p>Add proposed project types to address drought.</p> <p>i. Feasibility studies of water storage infrastructure</p> <p>ii. Technical evaluations of managed aquifer recharge</p>	<p>Feasibility studies of water storage infrastructure and technical evaluations of managed aquifer recharge would both be eligible under the broad umbrella of "Resource Services (plans or studies)".</p> <p>Additionally, this comment will be shared with the Reclamation Development Grant Program. The Reclamation Development Grant Program under Crucial State Need has established a category of grants specifically designed to incorporate drought resilience measures and will fund projects under the drought plan.</p>	Coordination with RDG
2. Planning	3. Eligible Projects	The Drought Plan specifically suggests that DEQ identify drought-related impairments to water quality in its TMDL documents and, in doing so, it also encourages the inclusion of drought resilience-building projects and activities in WRPs. The latter part of this recommendation could also be implemented in the revised RRG Planning Grant Program (or in WMG Program, if this type of planning returns to that program).	Watershed Restoration Plans must address the 9 elements as required by DEQ and EPA. Drought is included EPA's guide. <a href="https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf">https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf</a>	
2. Planning	3. Eligible Projects	Where do capitol improvement plans and strategic plans fit?	Capital Improvement Plans are eligible under the broad umbrella of "Resource Services (plans or studies)".	Final Guidelines

## RRG Stakeholder Comment Summary Matrix

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2. Planning	3. Eligible Projects	The decision to move both the development of Watershed Restoration Plans and Watershed Restoration Project Plans into the eligible projects list is one that we support. The status quo has not facilitated the development of these planning efforts, and we think it is a good idea to try something new by moving these efforts under Planning Grants (pg. 6-7). We hope that this will encourage more applications for these efforts, which will help provide an informed roadmap for efforts like the Nonpoint Source Implementation Grants offered in that program. This connection between the programs is key.	WRPs have always been eligible under Planning Grants. Funding for contracted services to prepare WRPs have been specifically defined as eligible under Planning Grants to help provide financial assistance to hire contracted technical service providers to prepare a WRP.	Final Guidelines
2. Planning	3. Eligible Projects	Also under Eligible Projects, we would appreciate clarification on whether a planning grant would fund the development of engineering drawings without simultaneous preparation of a formal Preliminary Engineering Report (PER) at the same time (pg. 6-7).	The ARMs define "Renewable resource planning grant" means a grant to provided funding for any preliminary or planning activity that would contribute to a renewable resource project as determined by the bureau. Examples include, but are not limited to grants to provide funding for preliminary engineering reports, resource assessments, or technical reports. A PER is not necessarily required in order to apply for RRG Project grant funds, however the RRGL Application sections require the information included in a PER or a Technical Narrative in order to meet the eligibility criteria.	Final Guidelines
2. Planning	3. Eligible Projects	Under Resource Services will a strategic / long range plan be eligible. Many of the irrigation groups I have worked with have a somewhat limited understanding of their entire system including operation and management. When a big picture i.e. Strategic plan is developed it can provide a good basis to ID priority project with higher resource benefits and less expensive alternatives. For example the strategic plan identified and brought to light a significant issue with trees and woody debris – the district has enlisted at a minimal cost the MT Conservation Corp to work on the issue. Strategic plans can also enhance the overall management of a district which can potentially eliminate emergencies and impacts. Four districts YRCDC assisted with strategic planning all initiated / implemented projects that were identified during the initial stages of the planning process and before the strategic plan was finalized. The plan and planning process helped provide direction and opportunities. Most of the have also been collaborative in nature bring local CDs and Irrigation Districts together.	As long as the applicant can demonstrate that the planning activities would contribute to a renewable resource project as defined in the ARMs. The ARMs define "Renewable resource planning grant" means a grant to provided funding for any preliminary or planning activity that would contribute to a renewable resource project as determined by the bureau. Examples include, but are not limited to grants to provide funding for preliminary engineering reports, resource assessments, or technical reports.	Final Guidelines
2. Planning	4. Eligible Expenses	WRPs require a great deal of staff time, if this is limited to only contracted technical services. CDs and Counties are tapped out with grants to help local groups. WRPs are done in house by watershed groups.	Funding for contracted services to prepare WRPs have been specifically defined as eligible under Planning Grants to help provide financial assistance to hire contracted technical service providers to prepare a WRP. Grant funding for watershed groups or other local groups staff time is eligible under Watershed Management Grants.	Final Guidelines

## RRG Stakeholder Comment Summary Matrix

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2. Planning	4. Eligible Expenses	<p>The only eligible expense noted in the Planning Grants section is for Contracted technical or engineering services. There is nothing, apparently, for any project management costs for the project planning (staff time to manage consultants, review bids etc.) and of special concern, no travel expenses (to and from project site, holding stakeholder meetings or attending stakeholder meetings). The management of this type of project, even in the planning stage, takes staff time, and usually requires travel to and from the project site, and meetings about the project. The lack of funding for the sponsor of the grant to at least reimburse travel and meeting costs may cause many to reconsider applying.</p> <p>I know that my Conservation District will not consider applying for a grant that won't allow administration/management expenses as part of the eligible expenses. Grant administration and project management take up a significant amount of staff time, and in some case, supervisor time. It is unreasonable to not consider those as part of the eligible expenses. It would be great if DNRC would reconsider and expand eligible expenses to include admin time for selection and hiring a consultant; management of contractor/engineer; organizing and hosting stakeholder meetings; travel to meetings; providing input to consultant on design of project, draft and final plans; staff time to create a "strategic plan"; grant administration.</p>	<p>Funding for contracted services to prepare WRPs have been specifically defined as eligible under Planning Grants to help provide financial assistance to hire contracted technical service providers to prepare a WRP. Grant funding for watershed groups or other local groups staff time is eligible under Watershed Management Grants.</p>	Final Guidelines
2. Planning	4. Eligible Expenses	<p>I don't think eligible costs should be limited to contracted technical or engineering services. I think some entities have staff capacity to develop PERs and technical narratives.</p>	<p>*Preliminary Engineering Reports must meet the standard as described in the most current Uniform Application for Montana Public Facility Projects or meet the requirements of the RRGL Project Grant Application – Technical Narrative. PERs and Technical Narratives standards are not defined by DNRC. In particular, a PER requires a signature by a Professional Licensed Engineer.</p> <p>Grant funding for a local organization's staff time would need to be directed to an appropriate grant program.</p>	Final Guidelines
2. Planning	4. Eligible Expenses	<p>Why is grant administration ineligible? DNRC is requiring progress meetings, and there must be some kind of documentation required for completing the requirements for 50% reimbursement and final reimbursement documents and reports. Not allowing admin costs means the recipient can't communicate with DNRC or complete DNRC-required documents because there is no budget for it.</p>	<p>DNRC does not require progress reports for planning grants. Additionally, DNRC only reimburses planning grants based on 50% of the grant for a draft report and 50% for a final report. Final reports are not required. Grant administration is not eligible, because DNRC does not require any administration of Planning Grants.</p>	Final Guidelines
2. Planning	4. Eligible Expenses	<p>Please consider making grant admin an eligible expense, given proper backup and justification.</p> <p>Reimbursement and Reporting What is the frequency of reporting / reimbursement? What if a small organization (such as a small conservation district) can't afford to pay consultant fees upfront and wait months for DNRC to reimburse them? Will there be a way to request DRNC to pay invoices to consultants directly or for organizations to apply for exemption so they can be reimbursed before they pay the consultant?</p>	<p>DNRC does not require progress reports for planning grants. Additionally, DNRC only reimburses planning grants based on 50% of the grant for a draft report and 50% for a final report. Final reports are not required. Grant administration is not eligible, because DNRC does not require any administration of Planning Grants.</p> <p>DNRC grants are only for reimbursable expenses. Organizations may request relief from this requirement. Consideration may be granted on a case by case basis.</p>	Final Guidelines



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2. Planning	5. Grant Limits	We appreciate the guidance that the table on page 8 under Grant Limits provides, especially for helping structure applications. We feel that the rough dollar amount for each category makes sense; however, at the same time we can see some benefit to combining some of the categories to make the process more streamlined for the Department and applicants. We believe that with appropriate guidance that staff can rely on the budget justification within the award to modify a particular planning efforts award amount (pg. 8).	The Planning Grant program has long standing grant caps based on the type of planning grant applied for.	Final Guidelines
2. Planning	5. Grant Limits	Impacts to watershed planning and Watershed Restoration Plan (WRP) development would be negative. While it is extremely important for local governments, watershed groups, and nonprofits to work together on watershed planning, forcing these relationships to look a certain way by requiring non-governmental organizations to partner with local governments for a needed grant may create more issues than it solves. oA better approach might be requiring letters of support or other demonstrations of support from local governments in private entity grant applications, rather than requiring government or government agency sponsorship of private entity grant applications.	<p>Answer: DNRC is not "forcing" ineligible entities to work with a local government sponsor applications for RRG Planning Grants. DNRC has seen unrepresented collaboration between local governments and local groups through its grant programs in the last few years that has bolstered relationships as well as added capacity to small organizations. By creating an opportunity to expand access to grant programs through tools like MOUs and other agreements, local groups and local governments can support eachother where projects and missions overlap. Furthermore, DNRC is interested in becoming a partner on creating a model framework or templates for agreements to clarify the roles and responsibilities between local governments and local groups they sponsor to enable this collaboration.</p> <p>DNRC cannot legally provide certain RRG grants to private persons which includes individual, association, partnership, corporation, or other governmental entity that is not eligible for loans and grants under 85-1-605, MCA.</p> <p>MCA 85-1-605 limits the types of grants eligible to state, local or tribal government assistance to RRG Project, RRG Planning and Emergency Grants - those grant programs are specifically identified in the RRG Statute.</p> <p>MCA 85-1-609 allows DNRC to provide grants to private persons, which include non-government entities to apply for and recieve grants from the other programs, Irrigation Development, Watershed Management, Private Grants and Non Point Source Grants. Those grant programs are not specifically identified in statute but are identified in House Bill 6.</p> <p>Additionally, the definition of eligible entities for RRG Project, RRG Planning</p>	Final Guidelines

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2. Planning	5. Grant Limits	We recommend allowing watershed groups and other non-government entities to apply for all RRG grants including WRP development, WRP project, and technical assistance grants. If groups choose not to apply that would be their decision rather than restricting them from applying. As we heard during the stakeholder meetings, groups with planning documents in place do better applying for federal project funds, and that is true in MWCC's experience. WPR's could alternatively be nested under WMG grants to avoid the government entity application limitation.	<p>Watershed groups and other non-governmental entities can apply to the Watershed Management Grant Program for grant funds to support activities specified in the comment. Development of Watershed Restoration Plans (WRP) including personnel expenses or contracted services are eligible expenses in Watershed Management Grant Program.</p> <p>DNRC has created an opportunity for local governments to apply for a grant to obtain contracted technical services for WRPs. WRPs have always been eligible under the RRG Planning Grant Program, but DNRC feels that specifically calling out this opportunity will help local groups obtain funds for contracted services necessary to complete WRPs. Additionally, local governments applying for WRPs in Planning Grants will not have to provide match, and those grant funds for contracted services can support local watershed group program efforts.</p>	Final Guidelines
2. Planning	5. Grant Limits	<p>During the fall 2023 RRG stakeholder meetings it became clear that there have been few recent requests for supporting WRPs through the Watershed Management Grant program. We are concerned that the continued lack of TMDLs (Total Maximum Daily Loads) across the state is contributing to this problem. We support increased DEQ capacity to establish the required TMDLs in more watersheds so that more groups, both government and non-government, can apply for WRP development. Contrary to some comments made during the RRG stakeholder meetings, there are active watershed groups and other conservation nonprofits working in areas without WRPs. Just a few examples include:</p> <ul style="list-style-type: none"> <li>● Musselshell Watershed Coalition (currently working with DEQ on TMDLs)</li> <li>● Winnett ACES</li> <li>● Stillwater Valley Watershed Council</li> <li>● Clarks Fork Yellowstone Partnership (currently working with DEQ on TMDLs)</li> <li>● Bighorn River Alliance</li> <li>● Flathead Rivers Alliance</li> <li>● Rocky Mountain Front Ranchlands Group</li> <li>● Ranchers Stewardship Alliance</li> <li>● Not to mention larger groups like Trout Unlimited, National Wildlife Federation, Montana Wildlife Federation, and Montana Audubon</li> </ul>	DEQ's funding for TMDL development is outside of the scope of the RRG Stakeholder Group.	
2. Planning	7. Funding Cycles	Concern about DNRC staffing levels to get grants out in time and get work done.	DNRC plans to allow eligible grant reimbursement from time of award letter to allow communities to begin work on planning documents while DNRC drafts grant agreements.	Final Guidelines
2. Planning	7. Funding Cycles	We support the proposed funding cycles schedule offered (pg. 8).	Thank you.	
2. Planning	10. Grant Management	Will work commenced before the approval of a grant if it is an eligible expense that was incurred during at least this biennium. If an entity is trying to get in a position to make an application for a project grant there isn't much time. It seem like that was mentioned during the meeting? Fully understand that reimbursement would only be if a contract is awarded?	DNRC plans to allow eligible grant reimbursement from time of award letter to allow communities to begin work on planning documents while DNRC drafts grant agreements.	Final Guidelines
2. Planning	11. Outreach	Outreach plan for Planning Grants?	Thank you.	Final Guidelines
2. Planning	11. Outreach	Outreach plan for Technical Assistance.	Thank you.	Final Guidelines

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2. Planning	10. Technical Assistance	We are pleased to see the creation of technical assistance grants within the RRG Planning Grant Program. This addition will extend the capacity of local governments, as well as help implement the Plan's recommendation to, "Increase state assistance for municipal water and land-use planning and management."	Thank you.	
2. Planning	10. Technical Assistance	I've been reading through the draft RRGL guidelines for the 2025 biennium that was sent out a week or two ago. I was just curious how the technical assistance for applying for planning grants works? Is that limited to just engineering firm to participate, and have you already finalized the entities you will be contracting with? MAP works with a lot of communities that I think could make good use of that assistance. I think that will be a great resource, many of the communities MAP works with have project needs, they just don't know where to start to apply for funding.	DNRC plans to provide technical assistance to local governments through direct contracted services. DNRC must follow state procurement in obtaining the contracts for services. MAP may be able to provide assistance if they have a state term contract for such services.	Grant Application
2. Planning	10. Technical Assistance	We support and appreciate the efforts made by the Department to offer greater technical assistance for applicants (pg. 10).	Thank you.	
3. Private Grants	2. Eligible Applicants	I thought I heard during the meeting last week that irrigation or conservation district could apply if fund were available. Not sure the guidelines indicate that.	Private grants are available to (c) a private person that is an individual, association, partnership, corporation, or other governmental entity that is not eligible for loans and grants under 85-1-605, MCA.	Final Guidelines
3. Private Grants	3. Eligible Projects	Would a new irrigation system utilizing reserved water be eligible?	To be eligible, a project must provide public benefits.	Final Guidelines
3. Private Grants	4. Eligible Expenses	The eligible expenses should not be limited to contracted services – especially with agriculture many producers have the skills to implement projects.	<p>DNRC does allow some eligible expenses be paid directly to land owners that build or construct projects themselves within the limits of state law. For example: Local Government Provides Labor and Equipment for Construction. Local governments must request authorization to use their own labor and equipment for construction projects. Common types of these projects are canal/ditch conversion to pipe and canal lining.</p> <ul style="list-style-type: none"> <li>• Procurement of materials must follow federal, state and/or local procurement laws, rules, and regulations.</li> <li>• The entity must provide DNRC with documentation of similar projects constructed or must provide DNRC with the manpower and machinery available to complete the construction according to plans and specifications.</li> <li>• Accurate expense records of labor and machinery used for construction must be kept and provided to DNRC for reimbursement.</li> <li>• A licensed engineer or surveyor registered in Montana must be present for inspection and completion of the project (MCA 18-2-121).</li> <li>• DNRC requires As-Builts that are certified by a licensed P.E. as part of the Final Reporting Requirements.</li> </ul>	Final Guidelines Grant Application Grant Administration Manual
3. Private Grants	5. Grant Limits	Need to clarify the grant limits and match – Projects are capped at \$5,000 with match except for septic system upgrades which are capped at \$7,500 – is this correct. However for a private person it appears they could get 25% of a \$50,000 project or \$12,500?	The grant limits are up to \$5,000 - \$7,5000 based on the project type, however the requirement to provide a 75% match may limit the amount of grant funds available to an amount less than the limits.	Final Guidelines

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
4. Emergency	4. Eligible Expenses	Similar to previous comments some entities have the ability perform engineering and construction without having to use contracted services – especially critical in the event of a structure or canal failure, especially if it is an emergency.	<p>DNRC does allow some eligible expenses be paid directly to land owners that build or construct projects themselves within the limits of state law. For example: Local Government Provides Labor and Equipment for Construction. Local governments must request authorization to use their own labor and equipment for construction projects. Common types of these projects are canal/ditch conversion to pipe and canal lining.</p> <ul style="list-style-type: none"> <li>• Procurement of materials must follow federal, state and/or local procurement laws, rules, and regulations.</li> <li>• The entity must provide DNRC with documentation of similar projects constructed or must provide DNRC with the manpower and machinery available to complete the construction according to plans and specifications.</li> <li>• Accurate expense records of labor and machinery used for construction must be kept and provided to DNRC for reimbursement.</li> <li>• A licensed engineer or surveyor registered in Montana must be present for inspection and completion of the project (MCA 18-2-121).</li> <li>• DNRC requires As-Builts that are certified by a licensed P.E. as part of the Final Reporting Requirements.</li> </ul>	Final Guidelines Grant Application Grant Administration Manual
4. Emergency	4. Eligible Expenses	In a similar vein, the Emergency grants apparently also no longer have any type of project administration included in eligible expenses . Having sponsored a few of these in my time with Lewis and Clark Conservation District, I am acquainted with the amount of staff time these take to administer, usually far more than some of the other grants.	<p>DNRC does not require regular progress reports and may waive the requirement for a final report in certain circumstances. Therefore DNRC does not require grant administration and does not allow that as a charge to the grant.</p> <p>Typically emergency project expenses far exceed the grant funds available and DNRC grants are generally used to offset the costs of the expensive items such as equipment or construction. Local funds are used to provide the funding for the rest of the project costs, such as what the commentor is suggesting.</p>	Final Guidelines
4. Emergency	10. Grant Management	Will work commenced before the approval of a grant if it is an eligible expense that was incurred during the biennium.	Yes, DNRC will allow reimbursement for eligible project expenses incurred within the biennium.	Final Guidelines
5. Irrigation Development	2. Eligible Applicants	Can watershed groups apply?	Private grants are available to (c) a private person that is an individual, association, partnership, corporation, or other governmental entity that is not eligible for loans and grants under 85-1-605, MCA.	Final Guidelines
5. Irrigation Development	2. Eligible Applicants	Could “eligible applicants” be explained better? For example, it appears that watershed groups would not be eligible. However, in the second stakeholder meeting, Autumn said we would be eligible but private citizens would have priority. What about a situation where a watershed group is applying on behalf of a private entity (basically the private citizen is contracting with the watershed group to manage the project and the grant because the citizen doesn’t want to/have time to hassle with the paperwork)?	Private grants are available to (c) a private person that is an individual, association, partnership, corporation, or other governmental entity that is not eligible for loans and grants under 85-1-605, MCA.	Final Guidelines
5. Irrigation Development	2. Eligible Applicants	We support the program guidelines for Irrigation Development Grants as proposed, including the biennium preference for small family on farm projects.	Thank you.	
5. Irrigation Development	4. Eligible Expenses	Good program but maybe needs to be promoted with CD who have reserved water.	Thank you.	Outreach

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
5. Irrigation Development	4. Eligible Expenses	Like previous comments some individuals might have the capacity to perform engineering and construction without having to use contracted services. Example NRCS might design a simple buried pipeline or structure and the producer has the capacity and equipment to install the project. Contracted services always cost more.	DNRC cannot reimburse expenses provided by another government entity such as NRCS. Grant funds can only be used to reimburse eligible project costs incurred by the grant recipient.	Final Guidelines
5. Irrigation Development	4. Eligible Expenses	The grant table does indicate Reimbursement for eligible expenses during biennium	DNRC plans to reimburse eligible project costs incurred after the date of award letter.	Final Guidelines
5. Irrigation Development	10. Grant Management	<p>Match</p> <p>In the stakeholder meeting, it was stated that match would have new requirements for documentation. Match requirements should be described thoroughly in the grant application so applicants know what will be required of them, so they know they will be able to meet the requirements.</p>	<p>Match requirements have not changed. There are not new requirements for documentation. DNRC will be providing consistent requirements for match in the Final Guidelines: Matching contributions may be in the form of in-kind or cash from local, state or federal sources. However, all contributions must be targeted for expenditure on the project specifically identified in the application.</p> <p>Costs claimed as match must meet all the following criteria:                      Matching funds must be substantiated by accounting records;                      Be necessary and reasonable for the accomplishment of project objectives;                      Be considered eligible as meeting program requirements.</p>	Final Guidelines
5. Irrigation Development	10. Grant Management	<p>Reimbursement and Reporting</p> <p>What frequency are grant reports required? What is required in reporting? Knowing how involved this process is may help a private citizen know if they want to apply for the grant – how much paperwork is going to be involved? This is way watershed groups can help if they are allowed to be applicants – they can take care of the paperwork for the landowner and make sure it’s being done properly and submitted on-time. (Would need to allow admin time as an eligible expense in this case).</p> <p>Please consider clarifications for these questions, and consider allowing admin time for communications with DNRC and completing DNRC-required paperwork.</p>	<p>DNRC plans to require progress reports with each reimbursement request. The frequency of the progress reports will be dependant on the grantee's submission of reimbursement requests. Grant administration could be eligible for match if the proper match requirements are being met.</p>	Final Guidelines
6. Watershed Management Program	1. Purpose	<p>We are also pleased to see the continuation of the WMG program. This program has a critical role in maintaining local capacity, especially for watershed groups. The Plan recommends the creation of “dedicated, sustainable funding to build local watershed management capacity.” Specifically, it seeks to establish baseline support of local entities “by supporting watershed coordinators and conservation district affiliates for the time they spend engaging their communities and building trust, attending trainings, and sharing their stories at conferences and meetings – time that they are rarely compensated for under the current structure.” Although funders from all levels should consider how to better meet local capacity needs, the WMG Program is already uniquely positioned to provide this support because of flexibility in eligibility and its focus on local watersheds.</p>	Thank you.	

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	3. Eligible Projects	Capacity for watershed groups' personnel costs is critical to building and maintaining community engagement around watershed issues, watershed planning, and watershed restoration projects. We therefore strongly support the continuation of the WMG program. We also appreciate the inclusion of Watershed Group Formation funds. However, given that there are currently ~60 watershed groups around the state that MWCC works with, we recognize that formation of new groups will be much less likely than the need for existing groups to expand capacity and create new or revise strategic watershed plans. A WMG package that included Watershed Group Expansion as a viable use of funds would increase existing watershed groups' ability to use these funds. MWCC recommends combining the funding for Watershed Group Formation, Watershed Strategic Planning, and Watershed Group Expansion and allowing a \$50,000 maximum award for this new, combined category.	Watershed Group Expansion would be eligible under the "Strategic Program or Initiative". As long as the Watershed Group has a strategic plan that identifies the expansion of the group it would be eligible for grant funds in this category. DNRC disagrees that the categories should be combined as each is a distinct phase of an organization. If DNRC raises the grant limits to \$50,000 for a "Strategic Program or Initiative", this lessens the amount of grants that will be available through the program.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	We also strongly recommend returning Watershed Restoration Plan and Watershed Restoration Project Planning grants to the WMG umbrella, rather than putting them under Planning Grants. This will allow watershed group staff to use their existing knowledge of their watersheds and communities to create WRPs in-house where appropriate. Allowing only consultants to conduct local stakeholder outreach and watershed planning is, in many cases, highly inefficient, since hired consultants do not know the communities and resources like watershed groups do, yet they typically charge three to four times the hourly billing rate of watershed group staff. Most existing WRPs have been created by local watershed organizations - not by consultants. Additionally, it is extremely difficult to manage a grant with no funding for staff coordination and administration time.	<p>Watershed groups and other non-governmental entities can apply to the Watershed Management Grant Program for grant funds to support activities included in the of Watershed Restoration Plans (WRP) including personnel expenses or contracted services are eligible expenses in Watershed Management Grant Program.</p> <p>Managing consultants and coordination by staff should be on an organization's program priority, the planning grant funds are designed to assist the organization support their program of work.</p> <p>DNRC has created an opportunity for local governments to apply for a grant to obtain contracted technical services for WRPs. WRPs have always been eligible under the RRG Planning Grant Program, but DNRC feels that specifically calling out this opportunity will help local groups obtain funds for contracted services necessary to complete WRPs. Additionally, local governments applying for WRPs in Planning Grants will not have to provide match, and those grant funds for contracted services can support local watershed group program efforts.</p> <p>"Returning" the WRPs into WMG is unnecessary as they are eligible in both grant programs. However, Planning Grant funds are exclusively for contracted technical services while WMGs may support staff time.</p>	Final Guidelines
6. Watershed Management Program	2. Eligible Applicants	*Will a sample MOU be included in the grant application process so applicants can conform to the requested DNRC requirement?	DNRC will consider providing a template or suggested language for a MOU, however it is important that each entity involved in a partnership evaluate the needs of the organizations and projects and work through these agreements.	Grant Application. Grant Administration Manual.

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	3. Eligible Projects	In regard to #3 above, one way to potentially address the local capacity challenge is to adopt some of Oregon's framework for supporting local groups; specifically, their grants for operating capacity and engagement. We applaud the addition of Watershed Group Formation funds to this program because of the integral role these groups have in collaborating around water management and drought resilience building activities. However, it is also important to help these groups maintain sustainability by offering flexible funding for operating capacity.	DNRC did consider Oregon's framework for supporting local groups in creating the separate application types, particularly when establishing a grant program to support watershed groups to obtain funding to complete a strategic plan. We appreciate the problems that watershed groups face in becoming self-sustaining, with grant funds dedicated to assist watershed groups in completing the strategic plan process, they could identify programs or initiatives that will help them rely on a self-sustaining stable funding source rather than continuing to come back for capacity grants.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	We suggest combining the Watershed Group Formation and the Watershed Strategic Planning categories. Watershed groups typically develop out of an identified need (e.g., pollutant, ESA, or other shared challenge), so it is likely that formation and strategic planning would happen concurrently. Our understanding is that groups could apply to both categories simultaneously (?) under this structure, but we believe the funds for strategic planning will be requested far more often than the group formation funds, so it would simplify the program and reduce the administrative burden to offer one larger grant, where groups could request funds to develop bylaws and structure while also building momentum through strategic planning.	DNRC agrees that watershed groups often form out of an identified need and agrees that there will be more grant applications for the "Strategic Plans" or "Strategic Program or Initiative" categories, however combining categories does not represent a prioritization of funds nor does it create a separate funding amount for those types of applications. Combining into a larger grant may limit the amount of grants DNRC can provide statewide.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	*Watershed Management Grants. Perhaps it is the word "strategic" that is repeated I find confusing. The eligible projects heading notes grants will be awarded for planning efforts and capacity building activities identified in a strategic plan. Example projects include a watershed strategic plan. Is this grant to allow a watershed group to create the initial strategic plan and/or update a strategic plan currently in place? .How does DNRC define the word strategic?	"Watershed Group Strategic Program or Initiative" grants are available for programs or initiatives identified in a watershed group's strategic plan. strategic Plans focus on an organization's goals, this is generally a planning document that addresses an organization's current state, identifies future goals, develops a strategic plan (3-5 years) and can then be used to develop annual work plans. The Conservation District Bureau at DNRC has tools to assist CDs <a href="https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents">https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents</a> .  Updating a strategic plan would be eligible under the "Strategic Plan" grant category.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	We currently use a yearly action plan to accomplish long and short-term goals and objectives. Would this document qualify as a strategic plan or do we need to change the wording?	Question. Is this to determine if an application to a WMG is eligible under the "Strategic Program or Initiative"? Each application will have to be evaluated as a whole.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	We suggest adding explanatory language and examples in the Program Guidelines (Example Projects) so that watershed groups can explicitly see how the WMG Program offers a pathway for moving from strategic planning to implementing a program or initiative.	"Watershed Group Strategic Program or Initiative" - to be eligible for this grant category, a watershed group's strategic plan would have to identify the activities in the grant application. There are a wide variety of examples of programs or initiatives. It is highly dependant on the organization's goals.	Final Guidelines
6. Watershed Management Program	2. Eligible Applicants	Might want to include a little more description of a watershed group or is it self-determined.	A watershed group is a self-sustaining, non-regulatory, consensus-based group that is composed of a diverse array of stakeholders, which may include, but is not limited to, private property owners, non-profit organizations, federal, state, or local agencies, and tribes.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	incorporate drought resilience into the RRG framework is to explicitly identify possible projects. Identify specific projects that could qualify under Program or Initiatives, such as restoration project (design, engineering, and/or implementation) and local drought plan development.	Watershed group strategic plans as well as programs or initiatives may identify drought as a priority for their organization. The Reclamation Development Grant Program under Crucial State Need has established a category of grants specifically designed to incorporate drought resilience measures and will fund projects under the drought plan.	Coordination with RDG

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	3. Eligible Projects	<p>We suggest moving WRP and WRP project planning funds back to the WMG program or eliminating the local government sponsor requirement. In addition to the comment made at the 10/25/23 meeting regarding the lack of consistency in political vs. watershed boundaries, we also think these funds are more likely to be accessed by private groups compared to local governments. We agree that collaboration between private watershed groups and local governments is an important part of planning, but the reality is that developing these relationships is not always straightforward or formulaic. Forcing this collaboration could impose a larger burden on both the groups and the local governments, and it could delay the development of WRPs even more.</p>	<p>Watershed groups and other non-governmental entities can apply to the Watershed Management Grant Program for grant funds to support activities included in the of Watershed Restoration Plans (WRP) including personnel expenses or contracted services are eligible expenses in Watershed Management Grant Program. "Moving" the WRPs into WMG is unnecessary as they are eligible in both grant programs. However, Planning Grant funds are exclusively for contracted technical services while WMGs may support staff time.</p> <p>DNRC has created an opportunity for local governments to apply for a grant to obtain contracted technical services for WRPs. WRPs have always been eligible under the RRG Planning Grant Program, but DNRC feels that specifically calling out this opportunity will help local groups obtain funds for contracted services necessary to complete WRPs. Additionally, local governments applying for WRPs in Planning Grants will not have to provide match, and those grant funds for contracted services can support local watershed group program efforts.</p> <p>DNRC has seen unprecedented collaboration between local governments and local groups through its grant programs in the last few years that has bolstered relationships as well as added capacity to small organizations. By creating an opportunity to expand access to grant programs through tools like MOUs and other agreements, local groups and local governments can support eachother where projects and missions overlap. Furthermore, DNRC is interested in becoming a partner on creating a model framework or templates for agreements to clarify the roles and responsibilities between local governments and local groups they sponsor to enable this collaboration.</p>	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	<p>An idea that warrants consideration within this program is creating a category to fund instream flow leases. The Plan's recommendation is to "Establish a funding program to support instream flow leases," which are an important tool for building drought resilience. However, instead of creating a new program from scratch, it would be simpler to create space for this within an existing program, like the WMG Program. NGOs, like the Clark Fork Coalition and Trout Unlimited, collaborate with landowners to implement these private leases, and they often have to cobble together funding from a variety of sources. FWP's instream flow program receives funding from license dollars, although the amount it receives is a small proportion of the actual cost of most leases. Since NGO staff often negotiate directly with water right owners to complete these leases, it is logical to create this category within the WMG program because NGOs could then apply directly without local government sponsorship. Staff from the Water Resources Division's PIC Bureau would be happy to help facilitate this.</p>	<p>DNRC RRG cannot expand on its program of work at this time due to capacity issues. Additionally, as related to drought or drought mitigation, this may be a potential point of coordination with the RDG Program.</p>	Coordination with RDG
6. Watershed Management Program	3. Eligible Projects	<p>Were staff at MWCC or other NGOs (including watershed groups) consulted about the restructuring of the WMG program?</p>	<p>DNRC invited watershed groups and MWCC to participate in the RRG Stakeholder Process.</p>	



## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	3. Eligible Projects	Were representatives from Montana’s Tribal Governments invited to participate in the stakeholder engagement process given their eligibility for many RRG programs?	Yes DNRC invited its partners in tribal governments through irrigation and infrastructure to participate in the stakeholder group.	
6. Watershed Management Program	3. Eligible Projects	The Watershed Management Grants saw some notable changes, and we are supportive of the program as proposed. We continue to support the role that this program plays in providing capacity for watershed groups and their planning activities.	Thank you.	
6. Watershed Management Program	3. Eligible Projects	There is one change that would provide additional clarity in the table on page 25 in terms of the grant limits. The third column is missing the word “Program” so that the \$30,000 column is for “Watershed Strategic Plan Program or Initiative”.	Thank you. Typo will be corrected.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	From our experience these grants have filled an important role in project design on a smaller scale than the RRG planning grants, often for a program or initiative of a watershed group’s strategic plan. We want to make sure that project planning and design are still explicitly listed as eligible activities. Further, this category is currently capped at \$30,000, down from \$35,000. We think that it is worth consideration of raising this cap. Given the increased cost of engineering and design, \$30,000 will be spent quickly, and leaves little budget available for grantee expenses that usually parallel a design contract (project coordination, procurement and contracting, stakeholder engagement to iteratively review designs, grant administration etc.). A cap of \$50,000 would provide funds for both consulting and grantee expenses for project planning and design.	Thank you. DNRC will consider raising the cap to Strategic Program or Initiative to \$50,000.	Final Guidelines
6. Watershed Management Program	3. Eligible Projects	We appreciate the change to explicitly mention support for the host site cost share of Big Sky Watershed Corps members within the program (pg. 25).	Thank you.	
6. Watershed Management Program	5. Grant Limits	Does this mean if we are doing a strategic plan AND hiring a BSWC member, we have to do two grant applications? (or if we are doing any other combo of these eligible projects) Is there any way to have these just be tasks that can be applied for under one application? So much of the information will be the same.	Yes, there will be separate applications.	Grant Application
6. Watershed Management Program	5. Grant Limits	BSWC - Why not interns?	Intern costs are eligible for all other grant categories.	Final Guidelines
6. Watershed Management Program	5. Grant Limits	“Would drought planning fall under a strategic initiative under WMG? Or does drought planning fit better in a separate DNRC program?”	DNRC RDG Program has defined drought planning on the local level as meeting the definition of "Crucial State Need" therefore local planning efforts are eligible under RDG.	Coordination with RDG
6. Watershed Management Program	5. Grant Limits	Under the Watershed Group Formation category, is it possible to expand this to include Watershed Group Expansion? There are so many tasks that go with expanding – if we’re adding staff for the first time, we might need to create an employee manual, establish a hiring and interview procedure, determine interview questions, work-planning, etc. I know you don’t want to fund simply sustaining a watershed group and wouldn’t want to cover these each time a group hires a new employee, but it would be helpful to have funds the FIRST time when we’re establishing hiring procedures. SRWG is getting ready to go through this, but I’m sure others are in the same boat at times.	Waterhed Group Expansion would be eligible under the Watershed Group Strategic Program or Initiative. As long as the Watershed Group has a strategic plan that identifies the expansion of the group it would be eligible for grant funds in this category. DNRC disagrees that the categories should be combined as each is a distinct phase of an organization.	Final Guidelines

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	5. Grant Limits	What if our application includes tasks for multiple WMG categories? Say, we are doing strategic planning and need \$X for that, but also want to create a new program, under the Strategic Program category. What would the cap be then? Could you reasonably in one proposal ask for \$25k planning and \$30k program? Or a portion of the cap for each category with some overarching cap? It would really be a pain to have to apply for two grants (and for DNRC to have to review two grants) when most of the info will be the same, just two different tasks because there are two different categories. In my opinion, it makes more sense to have a flat cap for the WMG no matter what category it is – that would make it easier for applicants with multiple tasks.	In order to be eligible for a grant for a "Strategic Program or Initiative", the organization will have to provide a "Strategic Plan" that identifies the program or initiative. Therefore the application should not include a request for both.  DNRC set grant limits based on reasonable anticipated costs expected under each of those project types.	Final Guidelines
6. Watershed Management Program	5. Grant Limits	Where does the BSWC/intern/add'l staff fit in? I think that cap was \$5500, is that correct? Would that be in addition to any of the WMG category caps, or included in those caps? This is a really valuable category. We've used it for BSWC in the past and if nothing changes, we are planning to use it this year to help add an employee (if that's still allowed). If this was increased to be \$5500 for BSWC/staff time and miles, plus included some more \$ for supervisory time and training, it would be even more helpful. In the past, that \$5500 is really helpful for covering the stipend and some miles and supplies, but sometimes it's hard to get regular staff time funded for training and supervising the BSWC (or new employee). (I might be remembering the cap on this category wrong?)	Big Sky Watershed Corps cost share is eligible for grants up to \$8,000. Interns which would be paid on a monthly basis are eligible for reimbursement under "Strategic Program or Initiative"	Final Guidelines
6. Watershed Management Program	5. Grant Limits	I wanted to reiterate that these grants would be so much more approachable if there was a lower match requirement . As we discussed, it's not always possible or easy to have a gov't sponsor (to avoid having match). If a WS group could apply with lower match – maybe 25% instead of 50% - or if there were another way for you to measure "buy in" (involve at least XX stakeholders, or have at least \$XX in-kind through stakeholder participation), it would help a lot of us out.	Grants to private persons may not exceed 50% of the total project cost. MCA 85-1-614	Final Guidelines
6. Watershed Management Program	5. Grant Limits	Please don't eliminate admin from the grant. I understand capping it at less than X% and requiring justification instead of just paying a flat % - I think that's totally reasonable. But it does take considerable time to track the budget, prepare justifications, complete reports...My hope is that you'll create templates and have a webinar to make it very clear what will be expected (I know Jorri did this in the past, but the rules changed mid-cycle this time , ugh.), and still allow for admin fee up to a certain % with appropriate justification . I also think it would be helpful to include reporting criteria and reports in the WMG grant announcement to help us calculate how much we expect to need for admin.	Grant administration is an eligible expense under WMG. Templates and training materials are on the program website.	Grant Application. Grant Administration Manual.
6. Watershed Management Program	5. Grant Limits	"Changes happened in the middle of the grant cycle causing increased staff time needed." and "Reporting for staff time is much more stringent than any other funder."	ARPA funded WMG last biennium. Reporting had to comply with 2 CFR 200.	

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	5. Grant Limits	Why can't grant reports/reimbursements be fully reviewed and returned with a complete list of errors instead of returned multiple times? This is really hard on small nonprofits like us because we're relying on the reimbursement in order to keep our lights on. The longer it takes to get reimbursed, the more of a bind it puts us in financially. There was also some confusion about what kind of backup was required for staff time. At one point, I was told I had to submit a copy of my pay stub, which made no sense because it doesn't show what tasks/grants I spent my time on. Then I was told I needed to submit copies of all my timesheets signed. This isn't our procedure internally – timesheets are reviewed, but not signed because it's all done over email. Among other points of confusion, this took a long time to resolve and it happened in the middle of a grant period. The point of my comment was that the rules should remain the same through the full grant period and grantees should know what's expected up front so we can budget our time for it and make sure we are set up to meet the expectations.	ARPA funded WMG last biennium. Reporting had to comply with 2 CFR 200.	
6. Watershed Management Program	5. Grant Limits	The second comment refers to the fact that DNRC is our only grantor that requires back up of staff time, mileage, etc. in order to reimburse. For other grants, we describe what it will take to get the job done and justify anticipated hours, miles, etc in our grant application. Then when we do our grant reports and submit reimbursement requests, they trust us and pay us out. We know we could get audited any time and would have to provide proof, but they don't require it for every reimbursement. Other grantors assume that if our deliverables are complete (which we submit at the end), we did what it took to do the job. I know DNRC is guided heavily by state regulations and legislature so maybe this isn't possible, but it is a point of frustration for grantees because other funders don't have these same requirements.	DNRC reimbursement requirements are provided online.	Grant Administration Manual.
6. Watershed Management Program	5. Grant Limits	If an organization is using a planning grant to do a Watershed Restoration or Strategic Plan, the way these are written would force them to work with a contractor, and have no stakeholder outreach, which isn't really feasible for planning purposes.	Watershed groups and other non-governmental entities can apply to the Watershed Management Grant Program for grant funds to support activities included in the of Watershed Restoration Plans (WRP) including personnel expenses or contracted services are eligible expenses in Watershed Management Grant Program.  DNRC has created an opportunity for local governments to apply for a grant to obtain contracted technical services for WRPs. WRPs have always been eligible under the RRG Planning Grant Program, but DNRC feels that specifically calling out this opportunity will help local groups obtain funds for contracted services necessary to complete WRPs. Additionally, local governments applying for WRPs in Planning Grants will not have to provide match, and those grant funds for contracted services can support local watershed group program efforts.	Final Guidelines

## RRG Stakeholder Comment Summary Matrix

Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	5. Grant Limits	In the Watershed Management Grants, why are there limits to only BSWC support? Many organizations also utilize the Montana Conservation Corps fellow program.	DNRC will consider funding MWCC fellows program similar to BSWC if the programs are similar in financial and timing requirements. MWCC fellows would be eligible under "Strategic Program or Initiative".	Final Guidelines
6. Watershed Management Program	5. Grant Limits	I know for a fact that the Sun River Watershed Group has utilized the WMG program to update their Watershed Restoration plan a few years ago. Encouragement of planning—be it Strategic Planning or Watershed Restoration Plans—should be supported by the ability of organizations to obtain funding to do so. How will DNRC define a “strategic plan”? Will WRP’s be considered a Strategic Plan? What will be the criteria for a “Plan” to be acceptable to DNRC ?	Strategic Plans focus on an organization's goals, this is generally a planning document that addresses an organization's current state, identifies future goals, develops a strategic plan (3-5 years) and can then be used to develop annual work plans. The Conservation District Bureau at DNRC has tools to assist CDs <a href="https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents">https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents</a> .  Watershed Restoration Plans have 13 required elements. Watershed planning is geographically defined and goals set in a WRP are landscape level with water quality goals. <a href="https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf">https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf</a>	Final Guidelines
6. Watershed Management Program	5. Grant Limits	The change for admin costs from being a flat % to being what is justified is a real improvement. Thank you. It would be helpful if the application or a pre-application training could include a thorough description of anything that will be required for reporting, including any templates and how to complete them. It’s hard to estimate how much time it will take to administer a grant if you don’t know all the requirements ahead of time. For example, the final tab on the Unified Funding Tracker DNRC now requires is very confusing and will be time consuming if not explained.	Thank you. DNRC will provide access to progress report templates as well as reimbursement requirements as part of the application. Procurement documents are required for all grants prior to reimbursement.	Application Grant Administration Manual.
6. Watershed Management Program	5. Grant Limits	In the grant application, it would be very helpful to define each project type. If a group has been dormant for a number of years and is looking to re-boot, could they qualify under Watershed Group Formation? Or does it have to be a fully new group?	Thank you. DNRC will provide more extensive definitions for eligible project types in the grant application materials.	Application
6. Watershed Management Program	5. Grant Limits	Could making a Strategic Plan be part of starting a watershed group , and could you then apply for \$65,000? These tasks could easily be completed simultaneously and in the same grant cycle. Please clarify if a grant proposal can include more than one type of project and what constitutes “watershed group formation”.	Yes, watershed group formation could include strategic planning, but no, an entity would not be eligible for both. What constitutes "Watershed Group Formation" is the personnel time, contracted services or other expenses to create or establish a watershed group. The definition of a watershed group may vary based on local needs.	Final Guidelines
6. Watershed Management Program	5. Grant Limits	Please clarify the definition of a “strategic plan” and “watershed group strategic plan or initiative” to avoid the following confusion: o	"Watershed Group Strategic Program or Initiative" grants are available for programs or initiatives identified in a watershed group's strategic plan. "Strategic Plans focus on an organization's goals, this is generally a planning document that addresses an organization's current state, identifies future goals, develops a strategic plan (3-5 years) and can then be used to develop annual work plans. The Conservation District Bureau at DNRC has tools to assist CDs <a href="https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents">https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents</a> .	Final Guidelines

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6. Watershed Management Program	5. Grant Limits	How does a “strategic plan” differ from a WRP or other type of long-range plan?	<p>Strategic Plans focus on an organization’s goals, this is generally a planning document that addresses an organization’s current state, identifies future goals, develops a strategic plan (3-5 years) and can then be used to develop annual work plans. The Conservation District Bureau at DNRC has tools to assist CDs <a href="https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents">https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents</a>.</p> <p>Watershed Restoration Plans have 13 required elements. Watershed planning is geographically defined and goals set in a WRP are landscape level with water quality goals. <a href="https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf">https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf</a></p>	Final Guidelines
6. Watershed Management Program	5. Grant Limits	Will there be criteria for what is expected in a Strategic Plan?	<p>Strategic plans should focus on the mission and goals of the organization. DNRC does not have criteria expected or required in a strategic plan. Each organization is different and the mission, goals and structure are different. Applications will need to be clear about a need for an organizational strategic plan, define a budget and timeline.</p>	Final Guidelines
6. Watershed Management Program	5. Grant Limits	For the “Watershed Group Strategic Plan or Initiative” task/project: what if an organization uses their WRP as a “strategic plan” or has some other sort of long-range planning document? Will projects guided by that other plan still be eligible? Or will projects from a “strategic plan” have priority? (Note, not referring to WRP projects in this comment. I realize that’s under RRG Planning grants. I’m referring to WRP-directed programs and initiatives.)	<p>Strategic Plans focus on an organization’s goals, this is generally a planning document that addresses an organization’s current state, identifies future goals, develops a strategic plan (3-5 years) and can then be used to develop annual work plans. The Conservation District Bureau at DNRC has tools to assist CDs <a href="https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents">https://dnrc.mt.gov/Conservation/Conservation-Programs/Conservation-Districts/cd-resource-documents</a>.</p> <p>Watershed Restoration Plans have 13 required elements. Watershed planning is geographically defined and goals set in a WRP are landscape level with water quality goals. <a href="https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf">https://www.epa.gov/sites/default/files/2015-09/documents/2008_04_18_nps_watershed_handbook_handbook-2.pdf</a></p> <p>In order to be eligible for grants under a Strategic Program or Initiative, an organization’s strategic plan must clearly identify that program or initiative. WRPs may identify on the ground projects or priorities, but the organization needs to identify the implementation of the WRP as a priority for the organization.</p>	Final Guidelines
6. Watershed Management Program	5. Grant Limits	Please clarify the funding time-frame. It used to be that we had 2 years to complete the project. There is a reference to “grant recipients who have not procured planning services within 12 months of the signed agreement” and “failure to meet start-up conditions within a 12-month period” but not how long we have to do the grant activities. I thought someone said in the meeting that it’s only a year now, but I might have misunderstood. If grant term is just one year now, can we apply for a second WMG in the same biennium?	<p>The requirements to meet "startup" in a 12-month period will include a schedule of project activities from the grant recipient. Additionally, preference will be given during ranking to projects that can complete work within 2 years.</p>	Final Guidelines. Grant Application.
6. Watershed Management Program	5. Grant Limits	If grant term has not changed and we still have 2 years to complete a project, it would be helpful if the cap on “watershed Group Strategic Plan or Initiative” could be raised to \$40k. Projects in that category could potentially cover a lot of work.	<p>The requirements to meet "startup" in a 12-month period will include a schedule of project activities from the grant recipient. Additionally, preference will be given during ranking to projects that can complete work within 2 years.</p>	Final Guidelines. Grant Application.

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6. Watershed Management Program	5. Grant Limits	If you are applying for the BSWC and one of the other categories, do you do two applications or just one? If one, does BSWC come out of the total or is it added to it (ex. If you apply for BSWC, can you get \$48k for Watershed Group Formation, with \$8k of that dedicated to BSWC)? Please make it clear whether the BSWC Project can be combined with other projects.	DNRC grant applications for BSWC will differ from the application to apply for the other grant types.	Grant Application. Grant Administration Manual.
6. Watershed Management Program	5. Grant Limits	Can the \$8,000 to host a BSWC member also be used for “other volunteer or support positions”, as it has been in the past? o BSWC doesn’t work for every organization – for instance, the BSWC program requires their members to have an office to work in and some smaller watershed groups operate out of the coordinator’s home with no office space for a BSWC.	DNRC will consider funding MWCC fellows program similar to BSWC if the programs are similar in financial and timing requirements. MWCC fellows would be eligible under "Strategic Program or Initiative".	Final Guidelines
6. Watershed Management Program	5. Grant Limits	o By only funding BSWC, DNRC is giving an advantage to organizations who can afford to have an office. o In addition, BSWC is not a good fit for all technical or capacity-building tasks/needs. o Not every organization who applies for a BSWC is awarded one. o Additionally, MCC (and other sources) has other programs that provide support and capacity-building beyond BSWC – are those programs not eligible? o By only providing support for BSWC, DNRC discriminates against organizations who can’t use, or aren’t a good fit for the BSWC program. The way this appears to work, organizations that can use BSWC can get more money than those who can’t, is that correct? Please consider making this a true capacity-building option by allowing a broader use of funds, i.e. the old language “other volunteer or support positions” so it can be used by more organizations instead of favoring those who are able to use BSWC.	DNRC will consider funding MWCC fellows program similar to BSWC if the programs are similar in financial and timing requirements. MWCC fellows would be eligible under "Strategic Program or Initiative".	Final Guidelines
6. Watershed Management Program	6. Match	In stakeholder meeting 2, it was indicated that justification for in-kind match might change from what’s been accepted in the past. Could match justification requirements be defined better? For instance, it’s easy to submit an invoice for equipment costs or supplies that are donated to show proof of “in-kind”. If stakeholder time at a meeting associated with grant tasks can count as in-kind, how do we show that adequately? Will a spreadsheet be acceptable describing the meeting, amount of time, associated task, and rate? For large meetings, we can provide a sign-in sheet, but we don’t typically have any proof when it’s a one-on-one or small meeting.	DNRC will define match requirements in grant application materials as well as grant administration manual.  The comment regarding in-kind match for meeting attendees is unclear how that would meet any match requirements.	Final Guidelines Grant Application Grant Administration Manual
6. Watershed Management Program	5. Grant Limits	• As with WMGs, I like that there isn’t a set amount for admin. It would help applicants estimate their admin costs if they know more about the reporting requirements, see copies of templates, etc. prior to applying. (See comments about admin under WMG comments above).	Grant administration is an eligible expense under WMG. Templates and training materials are on the program website.	Grant Application. Grant Administration Manual.
6. Watershed Management Program	6. Match	As described above in WMG comments, please clarify match documentation requirements.	DNRC will define match requirements in grant application materials as well as grant administration manual.	Final Guidelines Grant Application Grant Administration Manual

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Heading	Section	Comment	DNRC Response	DNRC Action Item
6. Watershed Management Program	5. Grant Limits	Please clarify how long applicants have to complete a project. The amount of time to meet start up conditions and to contract with DNRC are spelled out, but not the project term.	The requirements to meet "startup" in a 12-month period will include a schedule of project activities from the grant recipient. Additionally, preference will be given during ranking to projects that can complete work within 2 years.	Final Guidelines. Grant Application.
6. Watershed Management Program	5. Grant Limits	Regarding the separate \$8,000 grants for hosting a Big Sky Watershed Corps (BSWC) member, we truly appreciate the effort to support this useful capacity-building program. However, this funding is restrictive in the following ways: It discriminates against organizations that aren't able to host BSWC members due to a lack of office space, staff supervisory capacity, or other considerations. It discriminates against organizations whose needs would be better served by a Montana Conservation Corps Conservation Intern or Fellow, or simply by additional support for existing staff. It requires organizations to apply for multiple WMG grants, rather than just one, for larger projects that involve the work of a BSWC member, Conservation Fellow, or Conservation Intern.  MWCC proposes making this additional \$8,000 available for not only BSWC members, but also for Conservation Fellows and Conservation Interns. We also recommend that this funding be available as a simple add-on to the Watershed Group Formation-Expansion-Strategic Planning category, with no additional application or reporting requirements, as well as a stand-alone grant for groups that need only the \$8,000 and are not carrying out a larger capacity-building project.	DNRC will consider funding MWCC fellows program similar to BSWC if the programs are similar in financial and timing requirements. MWCC fellows would be eligible under "Strategic Program or Initiative".	Final Guidelines
6. Watershed Management Program	5. Grant Limits	Concurrent to the RRG program revisions, DNRC Water Resources is updating the Montana Drought Management Plan that will likely emphasize drought resilience and natural water storage as key projects to reduce drought-related impairments to water quality. Adding clarity that drought resilience projects are fundable through RRG Project, Planning, and WMG grants would leverage water quality restoration goals across agencies and expand the types of projects that applicants could propose. We understand that drought resilience planning and projects are also fund-able under RDG Crucial State Need. However our understanding is that to qualify for Crucial State Need, drought resiliency efforts need to be much larger in scale and/or have statewide benefits. RRG funding for drought efforts focused in local watersheds would be an excellent complement to RDG funding, potentially leading to larger collaborative efforts that arise from common local needs and then expand in scope and scale.	DNRC RDG Program has defined drought planning on the local level as meeting the definition of "Crucial State Need" therefore local planning efforts are eligible under RDG.	Coordination with RDG
6. Watershed Management Program	6. Match	Finally, the requirement for a 50% financial match is disproportionate to government entities that can apply without match. Like impacts to RRG grants generally, as mentioned above, a 1:1 match requirement for watershed groups will impact the geography where WMG funds can be put to work.	Grants to private persons may not exceed 50% of the total project cost. MCA 85-1-614	Final Guidelines

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6. Watershed Management Program	6. Match	On the new requirement to provide an invoice for in-kind matching , many groups use sign in sheets for stakeholder meetings. Will those still be allowed? Or will the organization have to create an invoice, attaching the meeting sign in sheet?	DNRC will define match requirements in grant application materials as well as grant administration manual.  The comment regarding in-kind match for meeting attendees is unclear how that would meet any match requirements.	Final Guidelines Grant Application Grant Administration Manual
6. Watershed Management Program	6. Match	In stakeholder meeting 2, it was indicated that justification for in-kind match might change from what's been accepted in the past. Could match justification requirements be defined better? For instance, it's easy to submit an invoice for equipment costs or supplies that are donated to show proof of "in-kind". If stakeholder time at a meeting associated with grant tasks can count as in-kind, how do we show that adequately? Will a spreadsheet be acceptable describing the meeting, amount of time, associated task, and rate? For large meetings, we can provide a sign-in sheet, but we don't typically have any proof when it's a one-on-one or small meeting.  As described above in WMG comments, please clarify match documentation requirements.	DNRC will define match requirements in grant application materials as well as grant administration manual.  The comment regarding in-kind match for meeting attendees is unclear how that would meet any match requirements.	Final Guidelines Grant Application Grant Administration Manual
6. Watershed Management Program	10. Grant Management	<u>Financial Match/Reporting Obligations:</u> Small watershed groups and nonprofits are required to manage their finances and accounting as rigorously, if not more, than any small business. In addition, these groups are almost without question required to provide financial match for any state or federal grant request; a steep requirement for any new or innovative water restoration project. Both steep match requirements and overly stringent reporting requirements may impact eligibility of any potential RRG applicant. MWCC therefore requests increased detail on intended reporting requirements for each program, and increased explanation for when and why match is required for private, non-government, and local governments. If RRG loans need government sponsorship, those would more likely have match available via the government entity so only requiring match of private entities is misplaced.	DNRC will define match requirements in grant application materials as well as grant administration manual.	Final Guidelines Grant Application Grant Administration Manual
6. Watershed Management Program	10. Grant Management	Regarding RRG program grant reports, MWCC echoes many of the comments you will receive from small watershed groups; increased reporting requirements are an administrative burden to small organizations. That being said, project and staff costs are readily justified and tracked by watershed groups so a list of what financial information will be required in reports should be very clear and upfront. Additionally, when reporting is redundant between quarters or grant awards are small, staff time is wasted reviewing lengthy reports. We would like to echo a comment made during the Stakeholders Group meeting: Rather than requiring grant recipients to write up a whole new final report, it would be helpful to request just a simplified, 1–2-page, summary document along with quarterly progress reports and the budget tracking spreadsheet. For smaller grant amounts (<\$30,000), consider requiring progress reports just twice a year instead of quarterly. If the grant recipient needs reimbursement sooner, they could submit additional reports.	Final reporting requirements in the grant agreement are being evaluated for opportunities to streamline. Additionally, DNRC's quarterly progress reports are required as part of the grant agreement, and are only required on a more frequent basis if reimbursement is needed by the grantee.	Grant Administration Manual



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7. NPS	1. Purpose	First, thank you to the vision and leadership of the Department for proposing this funding program for the biennium. We were excited to support it during the legislative session and we remain committed to its success in implementation. We appreciate the changes made to the proposal based on our feedback at the first stakeholder meeting and feel that the guidelines here better reflect an investment that can show a return. Specifically, necking down the municipal sewer connections in this first effort makes sense to us. Until we can have a better statewide roadmap for those efforts, it makes sense to start small and see if we can move the needle. We support the sideboards as proposed. This effort also helps free up additional resources to invest in both the Nonpoint Source Implementation Projects and Department of Environmental Quality (DEQ) 319 Funded Project Match efforts, both of which we strongly support.	Thank you. DNRC plans to roll out the NPS Projects at the same time as the Municipal Sewer Connections grants to evaluate the need of each program rather than dedicate a certain amount to each.	Final Guidelines
7. NPS	3. Eligible Projects	How to set priorities - septic risk map/model in the Flathead.	Thank you. Projects will be ranked based on their renewable resource benefits as well as other public benefits. It is uncertain if the Flathead Septic Risk Model can be replicated across the state in time for these grants to be used.	Grant Application. Ranking Requirements.
7. NPS	3. Eligible Projects	What are the limits of the appropriation? Unsure at this time, need to gauge interest in both this and the NPS Projects grants.	Thank you. DNRC plans to roll out the NPS Projects at the same time as the Municipal Sewer Connections grants to evaluate the need of each program rather than dedicate a certain amount to each.	Final Guidelines
7. NPS	3. Eligible Projects	Municipal Sewer Connections. How to outreach?	Thank you. DNRC plans to develop an outreach plan to promote this grant opportunity to the appropriate audiences.	Outreach
7. NPS	3. Eligible Projects	CDBG does assist with some direct benefits. Low to moderate income. Grants to municipality. Some potential to partner.	Thank you. DNRC plans to work with CDBG and other organizations that can fund similar projects to outreach this program to ensure success.	Outreach
7. NPS	3. Eligible Projects	In terms of Nonpoint Source Implementation Grants, we support the eligibility requirements of being an effort that is identified in the Montana NPS Appendix A-Best Management Practices and that priority goes to projects identified in an approved Watershed Restoration Plan. We think that the above identified need to help support planning grant efforts for these plans dovetails nicely with this effort. It may be worth revisiting the cap of the award grants for these implementation grants (pg. 30) as \$50,000 may be a bit too small given project costs, even if the desire is to clear out the low- hanging fruit in these watersheds. Hopefully, we can adaptively evaluate that cap.	Thank you. DNRC will adjust the cap for the NPS projects to \$50,000.	Final Guidelines
7. NPS	3. Eligible Projects	DEQ 319 Funded Project Match. Seems like this has lots of potential – may require some outreach.	DEQ 319 Program will manage grant funds as well as outreach.	Coordination with DEQ
7. NPS	3. Eligible Projects	Does the DEQ 319 program require contracted professional services or can an entity have its own technical staff.	See DEQ 319 Program Information. <a href="https://deq.mt.gov/water/Programs/nonpoint">https://deq.mt.gov/water/Programs/nonpoint</a>	Coordination with DEQ

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7. NPS	3. Eligible Projects	We strongly support the effort to provide a match for the DEQ 319 program. As we have often commented together, one significant hurdle for that program is applicants finding the requisite 40% match. This program is the solution we have been searching for to get more deserving projects off the planning table. We support the 30% match criteria as we do believe that applicants should still some work to find additional support to encourage more buy-in from local partners and communities. Further, we are supportive of the efforts to develop and Memorandum of Understanding with the DEQ to administer these dollars and limit duplicative grant management tasks.	Thank you.	
7. NPS	3. Eligible Projects	In general, this is a great idea and will be really helpful, especially in the case of match for 319 funds. Thank you for coming up with this. I could also see these funds helping with revegetation for bank stabilization and small LT-PBR projects. This is great.	Thank you.	
7. NPS	6. Match	*NPS Grants Match. Matching funds must be substantiated by accounting records. How will applicants track/invoice for in-kind time, such as stakeholder attendance and participation in meetings? Can a sign-in sheet with meeting time be used? How about small meetings with 1 or 2 stakeholders in a small setting related to the project/plan be invoiced with approved DNRC accounting records? Can DNRC provide examples within the grant application package to address this issue?	DNRC will define match requirements in grant application materials as well as grant administration manual.  The comment regarding in-kind match for meeting attendees is unclear how that would meet any match requirements.	Final Guidelines Grant Application Grant Administration Manual
7. NPS	3. Eligible Projects	*In 2020, we completed a Teton River Geomorphic Assessment using a watershed planning grant. The report identified over 15 critical areas needing to be addressed to maintain the integrity of the Upper Teton River. What grant program do we utilize to do more explicit analysis for each critical area identified in the report and to obtain additional funding to actually do the repairs? While there are many grants for planning, capacity and analysis, the gap is where do local organizations look to obtain construction dollars to fix the issue? It is not clear to me with the RRGL grants which steps to take.	RRGL Planning Grants has a category of grants for Watershed Restoration Project Plans to do a more explicit analysis of a site. If there is a WRP for the Teton River, the project may potentially be eligible for DEQ 319 funds. In general the project may be eligible for the RRGL NPS grant funds or an RRGL Project grant.	
7. NPS	7. Funding Cycles	In terms of the funding cycles (pg. 31), we support the proposed timeline. We understand that it is aggressive, but we share the desire to get these dollars out the door with the hope that we can communicate the successes of the program to the next legislature. Specifically, since this appropriation authority is not tied to the biennium like other programs it will give us the ability to press pause if we feel that things need a reset down the road. We would rather do that if needed then slow down now.  Most importantly, thank you for this comprehensive effort and the opportunity for stakeholders to be directly involved in the development of this document. This has been a tremendous effort to build shared understanding of these guidelines. We know that it has been an additional layer to complete, but it has been a solid investment in the success of these dollars.	DNRC is proposing a less aggressive time frame to allow for RRG staff time to complete RRG Project Application reviews and time to develop and roll out the NPS grants.	Final Guidelines