NPS Implementation Project Request for Applications (RFA)
Frequently Asked Questions (FAQ)
Issued June 7, 2024 – Revised August 14, 2024

DEQ has released a [Request for Applications for NPS Implementation Projects](). Applications are due August 30, 2024. This FAQ document is based on questions raised by applicants in previous years and meant to assist potential applicants in developing their project applications. For more information email: npsgrants@deq.virginia.gov.

NPS Implementation Project Request for Applications (RFA) Frequently Asked Questions (FAQ)	
TOPIC 1: Eligibility for activities by a MS4 locality or within the boundaries of an MS4 Questions	
1Q1	*Can MS4 localities apply for funding for projects that are not specifically identified/required in their permit?*
1A1	Yes, however the intent is not for applications to solely fund individual BMPs. The intent of the RFA is to fund a suite of BMPs, holistically addressing one or more source sectors, in specific implementation areas listed in RFA Table 1 of the RFA. In addition, Section II.D of the RFA lists activities as ineligible if they are in an MS4 that may be credited to a permit (or used to develop a permit) or that will be credited in a TMDL Action Plan or towards pollutant reductions in a permit, and therefore will not be eligible for funding.
1Q2	*Are federal funds under 319(h) eligible to meet ANY requirements for MS4?*
1A2	Federal 319(h) funds can be used by a MS4 in a limited capacity. Section 319(h) funds may be used to fund any urban stormwater activities that do not directly develop or implement a municipal separate storm sewer system (MS4) NPDES permit (e.g., not explicitly required in a permit or plan required by the permit). Thus, any activity that an MS4 locality will 'credit' towards meeting its permit requirements are not allowable under Section 319(h) funding. If an MS4 locality has a census boundary that includes area outside of the MS4 conveyance system, then stormwater activities outside the conveyance system boundary could be eligible if the activity is not being credited towards permit compliance.
1Q3	*What if an MS4 does not have a waste load allocation?*
1A3	For questions regarding IPs where an MS4 was given a load allocation and not given a waste load allocation (e.g., in the case of new MS4 localities), please contact Ashley Wendt at npsgrants@deq.virginia.gov, subject line <<"MS4 WLA vs LA">> on how to handle these situations.
1Q4	**What if part of a locality is not an MS4 but within a Combined Sewer Overflow (CSO) area and they have VPDES permit for the CSO; is this locality eligible for 319(h) funds for work within the CSO boundary?**
1A4	Similar to activity within MS4 localities, 319(h) funds can be used to fund urban activities within the boundaries of a CSO as long as the funds are addressing non-point sources of pollution and are not implementing anything required by a CSO permit (including a long-term control plan).
TOPIC 2: Implementation Plans (IP) Questions	
2Q1	*How do we characterize the needs of the IP if work has been done for several years and many BMPs have been accomplished and successful? No 319(h) funding was used and now we want 319. Do we need to reflect all that has been accomplished? How do we document the momentum we currently have as advantageous to continued funding?*
2A1	If an application is being submitted for an implementation plan that has had significant work already completed regardless of funding source, reflecting that in the application and proposal documents is important. An application should characterize the implementation goals (BMP goals) from the IP that have already been achieved or progress made (e.g., % of a phase 1, milestone 2 BMP goal met) and highlight what else needs to be done in order to achieve water quality results (essentially what the application will fund). Using the % BMP implementation completed to date for the IP stage 1 (or a specific IP milestone) goals and the % of BMP implementation to be completed through a successful

	NPS Implementation Project Request for Applications (RFA) Frequently Asked Questions (FAQ)
	application will help reviewers understand the collective impact of providing 319(h) funding. Projects will score better if reviewers can determine how the proposed work will attribute to meeting a specific goal, even if it is a small part of a much larger, ongoing effort. Additionally, describing how those BMPs already implemented were successful can provide a thorough justification for needing more funding to keep the momentum going.
2Q2	*Would it be a better idea to submit an application that covers more than one IP area, instead of multiple proposals?*
2A2	One proposal could cover a larger area or multiple IPs; however, the issue of geographic extent is a concern. There is a limit to the funds available for each award ($300,000) which translates to a limit to the number of BMPs that can be installed with those funds. A proposal needs to have a compelling justification for spreading those funds across a larger area or multiple IP watersheds. In addition, an application addressing multiple IPs may find it difficult to answer the question related to milestones. The application will be evaluated based upon its ability to implement IP milestones; a project that addresses multiple IPs, (thus spending less money in IP areas) may be at a disadvantage. However, a well-crafted proposal may be able to readily address these concerns and still be competitive.
2Q3	*What are the 9 key elements required for EPA approval? Is there a link you can give me to find out?*
2A3	The potential for federal Section 319(h) funding for nonpoint source BMP implementation is based on nine required elements of a NPS IP. These elements must have been included in the IP in order to receive acceptance from EPA, and therefore allowing it to be eligible for CWA Section 319(h) funds. The nine elements are outlined below in summary: 1. Identify the causes and sources of groups of similar sources that will need to be controlled to achieve the load reductions estimated in the NPS IP. 2. Estimate the load reductions expected to achieve water quality standards. 3. Describe the nonpoint source management measures that will need to be implemented to achieve the identified load reductions. 4. Estimate the amounts of technical and financial assistance needed, associated costs, and/or the sources and authorities that will be relied upon to implement the NPS IP. 5. Provide an information/education component that will be used to enhance public understanding of the project and encourage their early and continued participation in selecting, designing, and implementing the NPS management measures that will be implemented. 6. Provide a schedule for implementing the NPS management measures identified in the NPS IP. 7. Describe interim, measurable milestones for determining whether nonpoint source management measures or other control actions are being implemented. 8. Identify a set of criteria for determining if load reductions are being achieved and progress is being made towards attaining water quality standards, and if not, the criteria for determining if the NPS IP needs to be revised. 9. Establish a monitoring component to evaluate the effectiveness of the implementation efforts. More information on IP development can be found on the DEQ Implementation website or referenced in the IP Guidance Manual.
2Q4	*Is a project that covers a smaller area of an IP favored over a project that covers a larger area?*
2A4	This will vary on a case by case basis and is left to the applicant to decide. A smaller geographic area may be generally favored over very large areas, as it is easier to show incremental progress/success, especially if there are other efforts (funding sources) ongoing. Larger IP areas may not provide enough

	NPS Implementation Project Request for Applications (RFA) **Frequently Asked Questions (FAQ)**	
	information in order to target activity or show incremental progress. However, be cautious of identifying an area that is too small, because implementation capacity may be limited. Proposals encompassing larger areas or multiple IPs are allowed, however the proposal should include language justifying why it is effective and efficient to cover a larger area versus a smaller area. This question and answer is related to 2Q2.	
2Q5	*Example Scenario: The Town ABC lies within the Quantico Creek which discharges to the Potomac River and ultimately the Chesapeake Bay. The Town is subject to the Chesapeake Bay TMDL Special Conditions Section of the MS4 permit. Additionally, there is an approved Bacteria TMDL for Quantico Creek. According to RFA Table 1 Quantico Creek does not have an implementation plan. Quantico Creek is covered by the Chesapeake Bay Watershed implementation plan (WIP). Is the Town eligible to apply for work in Quantico?*	
2A5	A TMDL (usually referred to as a clean up study or report) is not the same as an implementation plan; therefore, just the completion of a TMDL does not qualify an area for Section 319(h) funds through this RFA. In addition, the Chesapeake Bay WIP does not qualify as an EPA-approved local IP. If an IP is not listed on *RFA Table 1*, then an application will not be accepted or reviewed. Although a local IP listed in *RFA Table 1* may be located within the Chesapeake Bay and may help to meet the Chesapeake Bay Watershed Implementation Plan, a project simply located within the Chesapeake Bay area will not be eligible for funding. Additionally, Section F states that activities in MS4 areas that are being credited towards a permit (or used to develop a permit or that will be credited in a TMDL Action Plan) will not be eligible for funding. BMPs implemented using Section 319(h) funding are to be located within an accepted IP watershed, cited in the IP report, and must address the pollutant(s) of concern.	
2Q6	*What is a watershed plan and how is it different than a NPS Implementation Plan? Is an approved watershed plan eligible for funding or is funding restricted to approved IPs only?*	
2A6	A watershed plan is a plan that meets EPA's nine key elements, but is not associated with an approved TMDL; it addresses impaired waters where a TMDL has not yet been established. Watershed plans approved by EPA are eligible to apply in the RFA; however, there are only two approved watershed plans in Virginia, Fairview Beach and Cunningham Creek. A complete list of approved implementation plan areas is contained in *RFA Table 1*.	
2Q7	*If funding is only available in IP areas (on RFA Table 1) then any work outside these boundaries are not eligible and no funding is available, correct?*	
2A7	Correct, Section 319(h) funding is limited to areas covered by an EPA-approved implementation plan and BMP activities covered by that IP. This funding source is not eligible outside of these boundaries. If you are interested in funding an activity outside of approved IP areas there may be other funding sources (that may or may not be administered by DEQ). VA DEQ does have some funding source documents located on our website [NPS Funding, Grant and Project Resources](#) that may be helpful. Ultimately, if you want to do nonpoint source implementation work and do not feel you are eligible for this RFA, send an email to [npsgrants@deq.virginia](#) as we may be able to put you in touch with other funding sources depending on the type of activity and location within Virginia.	
TOPIC 3: Best Management Plan (BMP) Questions		
3Q1	*What BMPs are eligible for funding and are there any BMP specifications or operation and maintenance requirements?*	
3A1	Section II of the RFA Instructions describes the Eligible Activities, including BMPs listed in an Implementation Plan that are eligible for funding and inclusion in an application under the NPS RFA. Applicants should refer to [DEQ's Nonpoint Source Implementation Best Management Practice (BMP)](#)	

	NPS Implementation Project Request for Applications (RFA) Frequently Asked Questions (FAQ)
	Specifications for reference on specifications. All practices are required to follow operation and maintenance plan requirements. Unless otherwise approved by DEQ, proposed BMPs should meet the specifications provided by the DEQ's Nonpoint Source Implementation BMP Guidelines and Specifications and (if appropriate) one of the following resources: DCR's Virginia Agricultural BMP Cost-Share Manual (VACS Manual), DEQ Virginia Stormwater Management Publications, DEQ and Virginia Tech Stormwater BMP Clearinghouse Post-Construction BMPs, Virginia Association of Soil and Water Conservation District (VASWCD)'s Virginia Conservation Assistance Program (VCAP) Resources, specifically the VCAP BMP Manual, and The Virginia Stream Restoration and Stabilization Best Management Practices Guide.
3Q2	*Are residential septic systems that require discharge waste permits allowed under this RFA? Are these the same permits issued by VDH?*
3A2	Alternative sewage discharging systems require a Virginia Pollution Discharge Elimination System (VPDES) permit from DEQ and thus are classified as a point source, which is ineligible for Section 319(h) funds. The 319(h) funded conventional onsite sewage systems (RB-3, RB-4, RB-4P) and alternative systems that do not discharge (RB-5) do require a VDH permit but are eligible for 319(h) funding.
3Q3	*Can you please address any Engineering Job Approval Authority Issues that may exist for Soil and Water Conservation Districts that apply for agricultural BMPs?*
3A3	The current DEQ Request for Applications for Section 319(h) NPS Projects allows for Soil and Water Conservation Districts (Districts) to apply for the funding to support implementation of agricultural best management practices (BMPs) listed in approved NPS Implementation Plans (IPs). All agricultural BMPs installed with 319(h) funds must have an individual with Engineering Job Approval Authority (EJAA) to design the practice and verify that the practice was installed according to appropriate specifications. Districts should follow the rules for EJAA that are listed in the most recent DEQ Nonpoint Source Implementation BMP Guidelines.
3Q4	*I was wondering if contracting out the installation and maintenance of pet waste stations is an acceptable expense covered under this award. The RFA mentions needing an operations & maintenance plan, but I wasn't sure if the Subrecipient itself has to perform it directly or not.*
3A4	Yes, contracting the installation/maintenance is acceptable. Keep in mind though, there is a 3-year lifespan for this practice and the timing starts on January 1 of the calendar year following the year of installation of the stations. So if you had a project, Oct 1, 2024 to Sept 30, 2027, and the stations were installed in June 2027, than the 3-year lifespan would start Jan 1, 2028. At that point, the project has ended and it will be your responsibility (as the Subrecipient) to make sure they are being maintained (whether you do it yourself or have a contractor do it). Something to keep in mind. See the DEQ Nonpoint Source Implementation BMP Guidelines and Specifications for more detail about the pet waste station BMP (PW-1).
3Q5	*Must Urban BMPs solve problems identified by VCAP (erosion, flooding, etc.)? Also, do Urban BMPs require the formal VCAP approval process such as ranking projects alongside others?*
3A5	Section 2.1 of the DEQ NPS BMP Guidelines about Urban BMPs explains that 319h-funded Urban BMPs must follow VCAP specifications and cost-share rates in accordance with the VCAP Manual but 319h-funded Urban BMPs do not require the formal VCAP application process involving VCAP steering committee approvals. Related to the questions: (1) Urban BMPs are intended to address issues of erosion, flooding, etc. and the IP should clarify if Urban BMPs are recommended in the area of interest to help address those issues.

NPS Implementation Project Request for Applications (RFA) **Frequently Asked Questions (FAQ)**	
	(2) The ranking component is part of the VCAP application process which would not occur if the urban BMPs are funded by 319h.
TOPIC 4: Water Quality Monitoring Questions	
4Q1	*Can water quality monitoring equipment and expenses occur before the Quality Assurance Project Plan (QAPP) is written or approved?*
4A1	EPA requires that a QAPP be approved before any WQM expenses are incurred/reimbursed. DEQ will not reimburse any WQM expenses until the QAPP is approved.
4Q2	*Can a water quality monitoring component include quantifying the edge of stream and/or delivered loads to the Chesapeake Bay or does it have to be actual water quality samples from the stream? Is monitoring for above and below a BMP or to calculate BMP load reduction efficiency eligible?*
4A2	Water quality monitoring should measure pollutants or indicators in-stream during the implementation project. Water quality monitoring should augment DEQ monitoring that can show water quality improvements due to implementation activities. The monitoring approach should reference how the monitoring strategy listed in the NPS IP will be implemented or portion thereof. DEQ calculates all pollution reductions and loadings for the BMPs reported during project implementation, so the applicant need not report this information. Currently Section 319(h) funding cannot be used for collecting water quality data to only address BMP pollution reduction efficiencies.
4Q3	*If we ask for funding for water quality monitoring, what type of Quality Assurance/Quality Control (QA/QC) plan do we need or have to submit?*
4A3	Under Section II.C.3 of the RFA Instructions, there is a sub-section on water quality monitoring. This section describes the requirement that all successful projects that include funds for water quality monitoring must submit for approval a Quality Assurance Project Plan (QAPP) to DEQ.
4Q4	*If we ask for funding for water quality monitoring, what are the minimum reporting requirements? What is WQX and how does it potentially apply to my application and how can I learn more about WQX?*
4A4	WQX is EPA's Water Quality Data Exchange database for water quality monitoring data. It contains water quality information from a variety of organizations (state, federal agencies, local governments, non-profits, etc. across the country. More information can be found at the EPA Water Quality Data website. EPA requires that any water quality monitoring data collected indirectly or directly from Section 319(h) funding must be reported into WQX or an approved equivalent. If eligible, data submission is also permissible through the Chesapeake Monitoring Cooperative (CMC), which links to EPA's WQX database. In addition to submitting data to WQX (or its equivalent), an annual and final report on monitoring activities are sent to DEQ. If there are any changes in methodology or timeline, an updated QAPP is sent to EPA for approval (Section II.C.3 of the RFA).
4Q5	*If tracking effectiveness of installed BMPs with water quality monitoring is not permitted under these funds, then what water quality monitoring is allowed?*
4A5	DEQ does want water quality monitoring results tracking the effect of installed BMPs. The collective impact of BMPs installed in various geographic areas (e.g. if you are working in an entire IP area, then WQM might need to be at multiple stations around the watershed(s)). This is different from BMP effectiveness monitoring, which generally monitors above/below BMP installation sites (which is often associated with research purposes). Any questions regarding the type of monitoring proposed should be reviewed with regional DEQ NPS Coordinators and detailed in Tab 6 of the application (Water Quality

	NPS Implementation Project Request for Applications (RFA) **Frequently Asked Questions (FAQ)**
	Monitoring Plan). WQM plans should address the type of monitoring described in the implementation plan (IP). For more questions, please contact your Regional NPS Coordinator or contact npsgrants@deq.virginia.gov
4Q6	*If we include WQ monitoring into our application and budget and request the additional 5% technical assistance funding, do we need to utilize all of that 5% funding on WQ monitoring activity?*
4A6	Yes, if an application requested an additional amount of TA to address water quality monitoring (up to $15k on a $300k application) it is expected that the WQM costs should meet or exceed the additional TA funds requested. Applications that include Water Quality Monitoring may request an increase of their Technical Assistance (TA or non-BMP) funding. These applications may request up to an additional 5% of the total 319(h) funds requested (e.g., $5k for every $100k of funds for which they apply). These funds are intended to support the costs of implementing the Water Quality Monitoring Plan (Tab 6 of the application). This can include developing the QAPP, purchasing materials or supplies, paying staff to collect and analyze samples, etc. If the WQM costs in the budget are only $10k but the applicant requested an additional $15k (5%) TA, the total amount of TA would need to be reduced.
TOPIC 5: Eligible Applicants, Partnerships, and Technical Leads	
5Q1	*What happens if one of the key partners identified in the Implementation Plan is no longer able or interested in participating in an Implementation Project? What happens if the assumed lead of the implementation project can no longer serve as the lead for the project?*
5A1	As indicated in Section III "Partnerships, Technical Expertise, and Sub-Contracting and Sub-Awards" of the RFA Instructions, past experience has shown that an active and engaged community partnership, involving all stakeholders identified in an IP, is a key component in a successful TMDL Implementation project. However sometimes key partners can no longer work on a project due to various reasons. This does not mean that the remaining identified partners cannot have a successful project. The most important factor is that the organization applying for funding and any partners identified in the application have the collective capacity to successfully implement the proposed work (including managing and administering the Subrecipient Agreement contract). Organizations may need to develop partnerships on their own; as feasible, DEQ will provide facilitation for organizations who want to partner together. If one of the organizations identified cannot participate and the applicant still wishes to pursue work in a portion of the implementation area, the application should include information justifying how the project will proceed without the identified key stakeholder involved. DEQ will review the application to determine if the project can still be funded.
5Q2	*Are non-profits or non-governmental organizations (NGOs) eligible to apply for the 319(h) funding or be sub-awardees of these funds (i.e., can a District contract with a group for specific deliverables associated with this RFA)?*
5A2	Yes, NGOs and non-profits both are eligible to apply for 319(h) funds or be sub-awardees. Yes, a District can contract with specific deliverables associated with the proposal. The applicant must follow their own procurement procedures when dealing with sub-awards.
5Q3	*A portion of one of our proposed watersheds is in another Soil and Water Conservation District (SWCD). Can we use funds in the adjoining District if that District has a high priority project that we do not know about at the time of proposal submittal?*
5A3	If a NPS IP covers multiple jurisdictions (e.g., multiple District areas), it's perfectly acceptable to have multiple jurisdictions (e.g., Districts) partnering on an IP project. Two Districts can work jointly and lead the implementation in their respective jurisdictional area. There does need to be communication

	NPS Implementation Project Request for Applications (RFA) Frequently Asked Questions (FAQ)
	between the two Districts up front before applying. It often works if one District is designated as a "lead" and will be the entity that receives the 319(h) Subrecipient award from DEQ and then provides a sub-award to the partner District. • DEQ suggests that sub-watershed area selection be discussed between all partners (including all Districts) ahead of submitting an application. The sub-watersheds should be based upon what was included in the NPS IP. DEQ understands that often this prioritization may change and shift during project implementation due to landowner involvement. As needed, DEQ can work with Subrecipients during project implementation to revise the eligible priority areas. More often than not, focusing in 2-3 priority areas may help to determine the interest in getting funding from subsequent RFA to address implementation in other priority areas. • There have been a few cases where a District has "given permission" to another District to do implementation work in their District area. This needs to negotiated ahead of any RFP application, it should be detailed in the proposal and must be described in any contractual arrangements. A District employee may not enter BMP information into the DCR Tracking Program within a different District area without receiving prior permission and without getting additional rights assigned in the Tracking Program.
5Q4	*Is it possible for multiple applicants to apply for one IP area? For example, two SWCDs located in the IP area sharing the funds?*
5A4	Yes, but the applicants should submit a single application clearly detailing the responsibilities of all partners/participants. If two organizations apply separately for the same IP (same area), then they are potentially competing against one another. Unless the projects are distinctive from one another (e.g. different sub-watersheds, different source sectors, and different geographic locations), then it will be hard for the review team to justify providing funding to two project for essentially the same work.
5Q5	*Can one organization apply for multiple residential septic projects? If so, do they go on separate applications?*
5A5	Yes, an organization may apply for multiple projects. This could be done as separate applications (which could then compete against each other) or as one combined application. If the applicant should submit a single application for multiple IPs, there is a risk that the geographic area may be quite large to show progress. However, if this is done, the application should detail the planned activities in all relevant watersheds and show how incremental progress will be made in each one.
5Q6	*What qualifies as a New organization that would then be eligible for the additional 5% technical assistance (TA) funds for non-BMP activity?*
5A6	Virginia's NPS Section 319(h) program has funded implementation projects since 2001. Until June 2013 the program was administered by the Department of Conservation and Recreation (DCR); as of July 1, 2013 the program has been administered by DEQ. For the purposes of this RFA, eligibility for the additional 5% TA for new organizations is based upon whether or not an organization has ever received a Section 319(h) NPS award in VA from either DCR or DEQ. If an organization has previously received VA Section 319(h) funds for an implementation project (Watershed Roundtable funding does not count in this regards) then the organization would not be considered "new".
TOPIC 6: Finance-Related Questions	
6Q1	*Can you please let me know if the required match can be entirely "in-kind" services? We are thinking of partnering with our local SWCD and they would offer their technical services as the in kind match for livestock exclusion.*

	NPS Implementation Project Request for Applications (RFA) **Frequently Asked Questions (FAQ)**
6A1	Yes, match can be 100% in-kind. Generally, if someone is volunteering their professional services (in what they do as a job), they can claim their hourly salary rate. If, however, they are volunteering in another capacity, then they would use the going rate for volunteer services. However, the District in question should check with the source of the funds paying for the technical services to see if they can be used as match. Some funders have restrictions on how their funds may be used as match.
6Q2	*What is the turnaround time for reimbursement?*
6A2	The 319(h) Subrecipient Agreements awarded as a result of the NPS Implementation RFA will be administered on a reimbursement basis. Subrecipients incur expenses (which includes paying invoices of sub-awards and BMP participants), makes all payments and then submits an invoice and a report to DEQ requesting reimbursement of these expenses. DEQ will not pay for anything for which the Subrecipient (applicant) has not already made payment. DEQ follows the Prompt Pay Act which means a Subrecipient should expect payment 30 calendar days after submitting a proper invoice with required documentation to DEQ. For example, if the reimbursement report is due on the 15th, reimbursement would occur no later than 30 days from that. Incomplete or late reports may delay reimbursement requests. Subrecipient Agreements will be managed with a quarterly report due the 15th day following the end of the quarter. For example, if you had an expenditure on October 4th, and submitted your quarterly report for October thru December on January 15th, you can expect to be reimbursed by February 15th. This means it could be up to 4 months before payment from DEQ. Subrecipients will have some limited ability to get reimbursed more frequently than quarterly by requesting permission to utilize the interim reimbursement request process, which is a request for more frequent reimbursement than quarterly (e.g., October interim report could be submitted for the BMP expenses incurred in October, and this could be submitted by November 15.)
6Q3	*Please explain "indirect" funds.*
6A3	Indirect costs are agency-wide, general management administrative costs (i.e., activities for the direction and control of the agency as a whole). General management costs consist of administrative activities necessary for the general operation of the agency, such as accounting, budgeting, payroll preparation, personnel services, purchasing, and centralized data processing, rent, utilities, etc. Conversely, direct costs are costs that provide measurable, direct benefits to particular programs. These can include costs that relate directly to instructional programs and also support costs that relate to the peripheral services necessary to maintain the instructional programs. In general terms, an indirect cost rate is the percentage of an organization's indirect costs to its direct costs and is a standardized method of charging individual programs for their share of indirect costs. Indirect funds will be allowed if an applicant has a federally-approved indirect cost rate agreement and can provide a copy of that agreement. If an organization does not have a federally-approved indirect cost rate agreement an applicant can include a de minimis rate of 10% of modified direct costs (see Section 200.414(f) of the Federal Uniform Grant Guidance).
6Q4	*Do Match Sources need to use the same BMP type as the BMP(s) selected for 319(h) funding? For example, must 319(h) Agricultural BMPs use Agricultural BMP as match; or 319(h) Septic BMPs use Septic BMP as match?*
6A4	Any match sources used to support BMPs must support one of the BMPs listed in the IP of interest (i.e., the IP(s) where the applications will implement practices). BMPs can be funded interchangeably between 319(h) funding and match, as long as they are within the IP geographical boundary and listed as one of the BMPs in the IP. For example, if an applicant is proposing septic BMPs for 319(h) funding, they can use VACS Agricultural BMPs as match, as long as all proposed BMPs are within the geographical

	NPS Implementation Project Request for Applications (RFA) Frequently Asked Questions (FAQ)
	area of the IP(s) and listed in the IP. Note that applications with Agricultural BMPs must have a Soil and Water Conservation District (SWCD) partnership from the beginning of the application process, including their participation in developing the application, providing a letter of support from the SWCD to explain their role/responsibilities (including reporting BMPs to the DCR tracking) and the match amount they'd provide. Also note that the SWCD must request approval from DCR to use VACS funding as cost-share and must include their approval in the application.
6Q5	*How do I determine if we are in a fiscal stress area?*
6A5	There are several sources of information about fiscal stress areas. The RFA application materials covers the topic in the Attachment 2 – NPS Application Questions file and the RFA Instructions file. You can also review information about fiscal stress in the DEQ Nonpoint Source Implementation BMP Guidelines, the Department of Housing and Community Development (DHCD) website, and use the DEQ Environmental Data Mapper (EDM) website (select the "County Fiscal Stress" layer under the TMDL/IP Watershed Layers dropdown and go the area on the map of interest to see the fiscal stress designation).
6Q6	*What are the match requirements for applicants?*
6A6	Effective July 1, 2024, SWCDs are no longer required to provide match (TA or BMPs) but must provide cost-share for BMPs. Section V.B of the RFA Instructions file details the match or other funding requirements for applicants including both SWCDs and non-SWCDs.
TOPIC 7: General or Miscellaneous Questions	
7Q1	*What happens if I need more time to complete the BMPs in the Subrecipient Agreement? Are the agreements ever extended?*
7A1	Yes, DEQ may extend an agreement so long as the Subrecipient is making progress and using good-faith efforts to complete the BMPs. DEQ does try to limit the number and timeframe for extensions to ensure funding is adequately spent and extension potentials are also limited to any federal requirements on when money must be spent.
7Q2	*If more than one area of a District is eligible for this RFA (e.g., the District covers more than one eligible IP area) is it advisable to submit more than one proposal?*
7A2	Although not limited to one proposal, an applicant that submits more than one proposal would effectively be competing against itself. In evaluating a proposal, an applicant's (and their partners') administrative capacity to handle more than one project will be evaluated.
7Q3	*Do we need letters of commitment and letters of support?*
7A3	Yes, letters of commitment are required for match expenditures (e.g. partner donating staff time, materials, etc.). Other general support letters are allowed, but not required.
7Q4	*How can current 319(h) Subrecipient's with existing Agreements obtain additional funding?*

7A4	In an effort to reduce documentation and approvals for existing Subrecipients, DEQ provides two options for existing Subrecipients that would like additional 319(h) funding:
	 a. Existing Agreement Modification – Continues existing BMPs in the current IP area. Modifications can be requested at anytime during the Agreement period.
	 b. Continued Funding – Applicable to the following situations:
	    i. Proposes existing BMPs in a new IP area.
	    ii. Adds new BMPs in a new IP area.
	    iii. Adds new BMPs in their existing IP area (e.g., currently completes septic BMPs and would like to add agricultural BMPs to their current IP area).
	    iv. **Note**: Requests for Continued Funding must be submitted to DEQ by September 30.

	NPS Implementation Project Request for Applications (RFA) **Frequently Asked Questions (FAQ)**
	Please contact npsgrants@deq.virginia.gov or your DEQ Regional Coordinator for information on the process to request additional 319(h) funding.
7Q5	*How detailed does the "vicinity map" need to be? Can it just be an image copied from the IP? If the maps in the IP are not detailed enough, where can we find better maps for implementation planning?*
7A5	Use your best judgment. If you are going to be targeting your area, we need a map with enough specificity to be able to tell where the work will be done. There have been issues in the past with names of sub-watersheds or river tributaries related to differences in the names from local knowledge and what is known on a statewide basis. Proposals should use the official IP watershed names (and related names from the IP). The map should indicate where the proposed project will take place. Please use the approved DEQ IP boundaries (available on Environmental Data Mapper (EDM). EDM, located on the DEQ website is a good resource that may help you create an implementation map. The Implementation Watersheds can be accessed by going through the following steps in the map viewer. Click the arrow next to "TMDL/IP Watershed Layers" to bring up the dropdown where you select "Implementation Watersheds." More information is available for each watershed by using the various Tools or simply by clicking on the map. The information for any area that you identify/click on will display on the screen over the map. You can choose to view the information in an attribute table. Up-to-date spatial data can be downloaded for use in ArcGIS desktop in the following location: VA DEQ Open Data Portal. The Implementation Watersheds data is updated nightly. Once you have unzipped the file, the polygon layer(s) can be added to ArcMap.
7Q6	*Are there examples of successful proposals or executed Subrecipient Agreement contracts that can be shared?*
7A6	Yes, DEQ can provide copies of successful proposals or executed Subrecipient Agreement contracts upon request. Please submit requests to npsgrants@deq.virginia.gov. Include the subject heading <<RFA: Request for example proposal>> or <<RFA: Request for example executed agreement contract>>
7Q7	*Where can I find my local contact to find about more information as to what is happening in my area?*
7A7	There is a designated Nonpoint Source Coordinator assigned to all regions that can help answer any RFA questions. In Section IX.B of the RFA, the names and contact information are provided but they are also listed here: ·Piedmont Regional Office: Madison Whitehurst, Madison.Whitehurst@deq.virginia.gov, (804) 489-8796 ·Tidewater Regional Office: Kaitlin King, Kaitlin.King@deq.virginia.gov, (804) 338-2430 ·Northern Regional Office: Kaitlin.King@deq.virginia.gov, (804) 338-2430 ·Valley Regional Office: Madison Whitehurst, Madison.Whitehurst@deq.virginia.gov, (804) 489-8796 ·Blue Ridge Regional Office: Kim Romero, Kimberly.Romero@deq.virginia.gov, (540) 759-9075 ·Southwest Regional Office: Autumn Matney; Autumn.Matney@deq.virginia.gov; (276) 608-8841
	TOPIC 8: Education and Outreach Questions
8Q1	*Would past Subrecipients who have done BMP education and outreach make those materials available?*
8A1	Please visit the DEQ Nonpoint Source Funding, Grant and Project Resources website. Outreach materials will be made available there. Other helpful information can be found in the EPA NPS Outreach

NPS Implementation Project Request for Applications (RFA) Frequently Asked Questions (FAQ)	
	Toolbox. If you have a specific type of outreach of which you have interest you may send your question via email to the npsgrants@deq.virginia.gov.