



SOUTH CAROLINA

§319 GRANT FOR IMPLEMENTATION PROJECTS  
**REQUEST FOR PROPOSALS**

FEBRUARY 17, 2021

**INITIAL PROPOSALS DUE: MARCH 19, 2021, 3 PM**

*ELECTRONIC SUBMITTAL ONLY*

South Carolina Department of Health and Environmental Control



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[319 NPS Implementation Grant Web Page](#)

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## Section 1: NPS Grant Program & Process

### 1.1 Purpose and Overview

The South Carolina Department of Health and Environmental Control (SCDHEC) is seeking proposals to conduct Nonpoint Source (NPS) Water Pollution Control Projects that reduce nonpoint source contributions to South Carolina waterbodies. **Projects must be designed to achieve measurable water quality improvements.**

The South Carolina NPS Grants Program is administered by SCDHEC in consultation with the U.S. Environmental Protection Agency (EPA). Grants for selected projects will be funded with monies provided to SCDHEC by EPA under the Federal Clean Water Act, Section 319(h).

### 1.2 Organizations Eligible to Apply for a NPS Grant

South Carolina public organizations such as state agencies, local governments, public universities, soil and water conservation districts, regional planning commissions, watershed organizations, and nonprofit organizations are eligible to receive NPS grants.

### 1.3 How to Apply

This solicitation involves a phased selection process. To be considered, interested groups must submit an initial proposal form. This form is attached to the email announcement of this solicitation.

*Organizations wishing to use 319 funds for activities within permitted MS4 urbanized areas should be sure to complete the MS4 section of the proposal document.*

In addition to the initial proposal form, applicants must provide several attachments. **Section 4 of this RFP includes a checklist of required items that applicants should submit at each step of the phased selection process.**

**Initial proposals must be received by 3 PM on Friday, March 19, 2021.**

Send your complete proposal and attachments by email to [NPSGrants@dhec.sc.gov](mailto:NPSGrants@dhec.sc.gov). Only emails sent to this address will be considered. Confirmation emails will be sent upon receipt of all proposals.

The initial proposal materials will be used to screen for eligibility. Applicants who make it through the initial screening will be invited to submit a final proposal. This proposal will include extensive detail about the project and its budget. Should an applicant be invited to submit a final proposal package, detailed instructions and fillable forms will be provided.

The following table outlines the significant events in this solicitation process. Please see [Section 4](#) for a checklist of what applicants should submit at the initial proposal and final proposal stages.

Process Step	Date	What Applicants Submit
<b>Initial Proposal</b>	<b><u>Due Friday, 3/19/21 by 3 pm</u></b>	<ul style="list-style-type: none"> <li>• Initial Proposal Form</li> <li>• Location Map</li> <li>• Pollutant Sources Map</li> <li>• Watershed-Based Plan, <i>if already completed</i></li> <li>• Commitment Letters</li> <li>• Letter of Assurance, <i>if project includes an MS4 area</i></li> <li>• Priority Areas Map</li> </ul>
Eligibility Screening (SCDHEC)	Within approximately 30 days	(n/a)
<b>Final Proposal</b> <i>(Eligible applicants only)</i>	Due approximately 6 weeks after invitation to submit final proposal	<ul style="list-style-type: none"> <li>• Final Proposal Form</li> <li>• Location Map</li> <li>• Pollutant Sources Map</li> <li>• Priority Areas Map</li> <li>• Budget</li> <li>• Commitment Letters</li> <li>• Watershed-Based Plan</li> <li>• Letter of Assurance, <i>if project includes an MS4 area</i></li> </ul>
Applicants are notified of selection decision	Within approximately 60 days of proposal submittal	(n/a)
Selected projects are asked to revise workplan	Approximately three weeks to make changes	All requested information
Finalized documents submitted to EPA for approval	Approximately one week after receipt	(n/a)
Grant Agreement drafted and sent to Grantee for signature	Approximately three weeks following EPA approval	Signed Grant Agreement
Project kickoff meeting	After Grantee signs Grant Agreement	<ul style="list-style-type: none"> <li>• Nonpoint Pollution Sources</li> <li>• Public Awareness/Permits agreement</li> </ul>

SCDHEC's NPS Program reserves the right to refuse any proposal which does not meet the following basic requirements:

1. On-the-ground BMP implementation must make up a minimum of 75% of the federal component of the project cost.
2. A minimum of 40% of the total project cost must be provided by non-federal matching sources.
3. Submission of an approved watershed-based plan which includes EPA's nine required elements.

Proposals which, in the judgment of NPS staff, fail to reasonably meet other requirements of the RFP may also be rejected.

*SCDHEC reserves the right to (1) fund at an increased or reduced budget, (2) make no awards following this solicitation, (3) reject all proposals, or (4) reject proposals which, in the judgment of NPS staff, fail to reasonably meet requirements of the RFP.*

## 1.4 Anticipated Grant Fund Allocations

NPS Grants will be funded with monies provided to SCDHEC by EPA under the Federal Clean Water Act, Section 319(h). No per-proposal maximum funding amount is specified in this solicitation, but **proposals must clearly justify all costs included in the proposal**. In addition, at least seventy-five percent (75%) of Federal 319 funds must be directed solely towards on-the-ground BMP implementation.

**Section 319 projects are funded by quarterly reimbursement.** SCDHEC is not liable for any costs incurred by the grantee prior to the date of grant agreement approval. No payment in advance of the final approval can be made (see [Sections 3.4-3.6](#)).

Please note that the Clean Water State Revolving Fund (SRF) might be more suitable for funding very large projects. You can find more information on the DHEC [SRF web page](#). SRF provides loans at a reduced interest rate for nonpoint source (NPS) projects.

## 1.5 Eligible Projects

This solicitation invites proposals for the implementation of a watershed-based plan for a waterbody that is included on the most recent 303(d) list or has an approved TMDL. In addition, SCDHEC staff may consider implementation projects with a protection focus for high quality or threatened waters in the absence of a known impairment. See [Section 2.2](#) for more information on funding priorities.

Proposals may either implement a portion of a watershed-based plan or a complete plan. Proposals should have a limited watershed size to provide a workable focus area. Most accepted proposals cover a reasonable geographic scope of one to four 12-digit Hydrologic Unit Codes (HUCs). All projects are designed to implement a reasonable number of Best Management Practices (BMPs) in a manner that leads to significant reduction in the nonpoint source pollutant load to a waterbody.

A completed watershed-based plan that meets EPA guidelines (see [Appendix 1](#)) must be submitted with a final proposal. This solicitation does not include funding for watershed-based plan development. Watershed-based plan requirements are discussed in further detail in [Section 2.1](#).

## 1.6 Limitations

Grant funds under this RFP may NOT be used:

- To implement requirements of any draft or final permit (includes MS4—see [Section 1.7](#))
- For nonpoint source research
- To undertake, complete, or maintain erosion or stormwater control work otherwise required by existing permits or orders
- To pay for requirements under a Comprehensive Nutrient Management Plan for a permitted animal operation
- To fund monitoring activities (see [Section 3.9](#) for details)

Land purchases are ineligible under Section 319(h) implementation program funding. However, this limitation does **not** apply to the acquisition of conservation easements when the original landowner retains title to the property. **Purchase of land for conservation easements is allowable.** Cost-share (and/or matching credit) may **not** exceed the appraised fair market value of the conservation easement or \$25,000 per acre, whichever is the lesser amount. At a minimum, the grantee would need to have an analysis showing how this purchase would improve/protect water quality and how it would be kept in easement/protection status over time. Please note that ineligible budget items include those that are not directly associated with the implementation of the easement, such as a “fund” or “stewardship fees” which may not be spent for an indeterminate amount of time.

Local matching funds are “federalized” upon approval of grant funding. Matching funds may **not** be used for activities or expenditures that would otherwise not be allowable, allocable, or reasonable for federal grant funds under federal grant regulations or guidelines. *For example, land acquisition is **not** allowable under Section 319(h) grant guidelines; therefore, local matching funds may **not** be used for land acquisition either.*

### **1.7 Special Notice for Watersheds Including MS4 Areas**

While **319 funds may not be used to implement requirements of any MS4 draft or final permit**, potential project components (i.e. certain BMPs) may not specifically be required in MS4 permits. Organizations may request approval to apply for specific activities within MS4 urbanized areas; however, **any organization applying for activities within an area covered under an MS4 permit must request approval to apply**. This includes organizations that are not subject to MS4 permits.

Some activities recommended in a watershed-based plan may be considered eligible for funding or as match under a 319(h) grant if they represent efforts, approaches, or proposals “above and beyond” any elements associated with a NPDES permit. **Grant-funded activities may not be counted in NPDES compliance reporting.**

Watershed monitoring under a NPDES permit will not qualify for 319(h) grant funding. If the applicant plans to use ongoing NPDES monitoring to assess water quality in support of the 319(h) project, that data may be delivered with quarterly progress reports (see [Section 3.5](#)).

**Applicants must include a signed Letter of Assurance on official letterhead verifying that activities proposed for a 319(h) project represent “practices that are above and beyond NPDES permit requirements, and that these activities will not be counted as compliance in any NPDES permit reports.”**

Approval will be handled in the initial proposal review process described in [Section 1.3](#). Keep in mind that the information requested in the initial proposal will be used to determine eligibility. It is crucial for applicants, particularly in MS4 areas, to fully address each item.

**Should a project be selected within an MS4’s urbanized coverage, remember that any activities paid for using 319 funds or matching funds may not be reported as activities performed by the MS4 to address their permit requirements. Letters of Assurance will be kept on file by SCDHEC NPDES Compliance staff.**

<b>Examples of Activities “Above &amp; Beyond” NPDES Permits</b>
<p><b>Add to Specified Number of Activities or Tasks Quoted in the NPDES Permit.</b></p> <p><b>Example:</b></p> <ul style="list-style-type: none"> <li>• The permit itemizes installation of nine septic system replacements.</li> <li>• The 319(h) grant proposal would request funds to replace septic systems number 10 and up, and explain that these qualify as “above and beyond” the permit requirement.</li> <li>• The applicant would replace the additional septic systems (10 and up) and would never count the additional installations as compliance with any NPDES permit requirements.</li> </ul>
<p><b>Fulfill Numerical Quota for Activities with No Specified Number in the NPDES Permit.</b></p> <p><b>Example:</b></p> <ul style="list-style-type: none"> <li>• The permit describes installing unspecified numbers of signs, disposal bags/stations, and receptacles to address pet waste in areas of high pet traffic, parks, or picnic sites.</li> <li>• The 319(h) grant proposal would request funds to install a specific numerical quota (3 signs, 300 bags, 3 bag stations, 3 receptacles) and explain that this quota would be “above and beyond” any permit requirement.</li> <li>• In this case, the applicant would receive grant reimbursement until the numerical quota had been reached but would never count those installations as compliance with any NPDES permit requirements.</li> </ul>
<p><b>Propose Completely New Activities or Approaches Not Included in the NPDES Permit.</b></p> <p><b>Example:</b></p> <ul style="list-style-type: none"> <li>• The permit proposes particular feasible structural controls to reduce urban run-off pollution but does not include bioswales as an effective management practice.</li> </ul>

- The 319(h) grant proposal would request funds to install bioswales or to reimburse other activities not specified in the permit and would explain these practices as “above and beyond” the permit requirements.
- The applicant would never count the grant-funded installations or activities as compliance with any NPDES permit requirements.

### **1.8 Non-Federal Match Requirement**

Applicants must demonstrate a minimum non-federal match of at least forty percent (40%) of the total cost of the project (grant funds requested = 60%, non-federal match = 40%, total project cost = 100%). SCDHEC will not accept proposals with less than 40% non-federal match.

The 40% non-federal match may be calculated as follows:

$$\text{Minimum non-federal match required} = \text{Grant funds requested} \times (0.667)$$

Match on a project is the value of funds or services used to help conduct the project that is not borne by the federal funds. Match includes contributions of cash or value services from individuals, organizations, municipalities, or non-federal public agencies. Federally funded projects or services do not qualify as non-federal match for NPS grants (see [Section 1.10](#)). Match activities must meet the same eligibility requirements as the federally-funded portion of the grant. All match activities must be fully documented. Proposals must identify all agencies, organizations, and/or groups providing non-federal match and amounts. Refer to [Section 3.8](#) for more information about matching funds.

### **1.9 Cost Sharing for BMP Construction**

NPS pollution control projects are designed to prompt installation of BMPs to address problems at many NPS sites. Grantees usually provide technical assistance and outreach services to effectively promote landowner installation of BMPs at NPS sites. In addition, a grantee may choose to set up a cost sharing program as an incentive to prompt installation of BMPs. Under cost sharing, a grantee provides project funds in the form of a cost-share payment to a town or individual to share the cost of acceptable BMP installations. To administer a cost sharing program, a grantee: determines the types of NPS sites to be targeted for cost sharing the eligible BMPs; determines the cost-share percentage rate (commonly along a sliding scale for maximum landowner involvement); provides information about availability of cost sharing; and uses an appropriate Cost Sharing Agreement. Recipients of 319 cost sharing must agree to properly operate and maintain the BMP for its intended purpose for the conservation practice service life. Recipients of 319 cost sharing for an Animal Feeding Operation must agree to follow a nutrient management plan (see [Section 3.12](#)).

### **1.10 Combining Federal Funds**

Other federal sources of funding may be used in combination with 319 Implementation project funds. However, other federal sources of funding may not be used as part of the required 40% match for 319 projects. Several commonly-used examples of Federal funding sources are listed below:

- [USDA Natural Resources Conservation Service - Environmental Quality Incentives Program \(EQIP\)](#): Example of an approved project with combined EQIP and 319 funds: A \$100,000 project is selected for EQIP funding, to receive \$50,000 in EQIP cost-share. The remaining \$50,000 in project costs could be divided as follows: \$30,000 EPA-319 (60%) and \$20,000 producer match (40%). The total federal share is 80%. This cost share rate is acceptable to the 319 program grant requirements. The total funds received by the landowner should not exceed 100% of the total cost of the practice.
- [USFEMA – Hazard Mitigation Assistance](#)
- [USHUD – Community Development Block Grant \(CDBG\)](#)
- [NFWF – Five Star and Urban Waters Restoration Grant Program](#)

### **1.11 Combining 319 and Clean Water State Revolving Funds – for Public Entities**

The 319 Nonpoint Source (NPS) Program can fund a wide variety of NPS water pollution control projects that reduce nonpoint source contributions to South Carolina waterbodies. The Clean Water State Revolving Fund (CWSRF) is a low-interest loan program that can fund a wide variety of water quality protection efforts, including assisting public entities with nonpoint source management activities.

Thus, 319 funds and CWSRF funds can be used in conjunction to implement best management practices to address nonpoint source pollution in South Carolina.

**CWSRF funds may serve as the 40% non-federal match for certain 319 projects.** The CWSRF program offers an interest rate that is lower than the normal low interest rate for nonpoint source projects that incorporate more than 50% best management practices.

- For instance, in terms of a wastewater system, CWSRF funds could be used to install or extend the main lines and 319 funds could be used to pay for the individual homeowner tanks and tie-ons to the main line.
- CWSRF funds have the potential to fund innovative NPS projects that can improve water quality, as long as this water quality improvement can be demonstrated.
- The cost for development of a Watershed-Based Plan (WBP) can be reimbursed through the Clean Water SRF loan if the WBP was developed up to 36 months before a CWSRF application that leads to the implementation of a CWSRF-funded best management project and if it was not previously paid for with federal funds. Please note that the watershed-based plan development costs would not be reimbursed until project construction begins. The WBP would also have to meet Preliminary Engineering Report (PER) guidelines listed [here](#). The PER will be reviewed by a CWSRF project manager, who will work closely with the engineer preparing the PER, to ensure that the PER contains the required relevant information.

For more information on CWSRF information and eligibility visit the [DHEC SRF page](#) or the [EPA SRF page](#).

If you are interested in combining 319 NPS grant funds and CWSRF loan funds, please contact both Shea McCarthy, Nonpoint Source Coordinator at [mccartsm@dhec.sc.gov](mailto:mccartsm@dhec.sc.gov) and Lynne LaSalle, CWSRF Information Coordinator at [lasalli@dhec.sc.gov](mailto:lasalli@dhec.sc.gov).

### **1.12 Timetable: RFP and Grant Awards**

This solicitation includes a phased application process. Applicants are required to submit a brief, initial proposal that will be used to screen projects for eligibility based on consistency with grant guidelines, watershed location, impairment status, and MS4 permitting requirements. Proposals that make it through this eligibility screening will then be invited to submit a final proposal package. [Section 1.3](#) includes specific instructions regarding both phases, and [Section 4](#) provides a checklist for each phase. Refer to the checklists to ensure you are submitting all required elements.

**Initial proposals must be received by 3 PM on Friday, March 19, 2021. All proposals must be submitted to [NPSGrants@dhec.sc.gov](mailto:NPSGrants@dhec.sc.gov).** SCDHEC staff will review proposals for eligibility within approximately 30 days. Applicants with eligible proposals will be given approximately 6 weeks to submit a final proposal package and will be provided with the necessary forms at that time. The **estimated** final proposal package due date is May 28, 2021 by 3 PM (actual due date will be determined after eligibility review is complete).

Once final proposals are received and reviewed, the Review Committee will select eligible projects for funding. Applicants will be notified of selection within approximately 60 days of the close of the final proposal period.

*SCDHEC reserves the right to (1) fund at an increased or reduced budget, (2) make no awards following this solicitation, (3) reject all proposals, or (4) reject proposals which, in the judgment of NPS staff, fail to reasonably meet requirements of the RFP.*

### **1.13 After Selection: Preparing the Workplan for Final Approval**

Final proposals that are selected for funding will then serve as the project's workplan. Following the Review Committee selection, SCDHEC staff will ask the selected applicants to submit a revised workplan that takes the comments received from the Review Committee into account. Following the submittal of the revised workplan, SCDHEC and EPA Region 4 will conduct a final review. EPA Region 4 must ultimately approve all projects for funding. **No** work should begin until the Grantee signs a Grant Agreement with SCDHEC.

### **1.14 After Selection: Timetable**

The Grantee should receive the Grant Agreement via mail to sign. The project will begin the day the Grantee signs the contract. The project will end after the specified number of months in the Grant Agreement.

What will SCDHEC do after Grantee signs the contract?

1. The Nonpoint Source Coordinator will contact the Grantee about setting up an initial kickoff meeting. This meeting will acquaint the Grantee with the 319 Program, cover invoices, quarterly reporting, and other required forms and reports, and answer any questions the grantee may have.
2. The Grantee will receive several documents from the Nonpoint Source Coordinator and 319 Grant Administrator to complete or review.

What will the Grantee do after signing the contract?

1. Contact the 319 grant staff to notify them the project has begun.
2. Mail the contract back to SCDHEC as soon as possible.
3. Review documents sent by the Nonpoint Source Staff. Complete and return the Nonpoint Pollution Sources form and Public Service/Permits agreement.
4. Begin work on the project. Agreed upon expenses are reimbursable only after the Grantee signs the Agreement.
5. Continuously record the information you will need for the first quarterly report and invoice. Be sure to maintain backup documents for every penny spent for both reimbursement and match (ex: receipts, bills, timesheets, including fringe and benefits if applicable, etc.). These should be submitted with your invoices.

### **1.15 SCDHEC Staff Contact**

#### **Nonpoint Source Staff**

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## Section 2: Eligible Project Details

This section includes specific information for eligible projects and outlines the components of a final proposal package. Note that much of this is included for information and planning assistance only and that a final proposal package will only be required from applicants who make it through the eligibility screening in phase one. Applicants will need to be familiar with this section's information to submit an initial proposal but are not expected to have all details finalized at that time.

### 2.1 Implementation Projects Execute Watershed-Based Plans

An approved nine element watershed-based plan is required to initiate a 319 grant-funded implementation project. Watershed-based plans are documents that identify a pollutant in a watershed, outline the sources of that pollutant, and then describe what is needed to address each source. These plans should *demonstrate a clear, in-depth knowledge* of the watershed. EPA guidelines specify nine required elements (see [Appendix 1](#)) that must be included in these plans. **All applicants must submit a copy of the plan or a link to an online version with the nine required elements in addition to their initial proposal and final proposal.** These plans will be reviewed and approved by SCDHEC staff prior to consideration of the proposal. Implementation proposals **cannot** include activities for developing a watershed-based plan.

### 2.2 Eligible Watersheds and Priorities

Proposals should have a limited watershed size to provide a workable focus area. Most accepted proposals cover a reasonable geographic scope of one to four 12-digit Hydrologic Unit Codes (HUCs). This solicitation invites proposals for the implementation of a watershed-based plan for a waterbody that is included on the most recent 303(d) list or has an approved TMDL. TMDL and 303(d) information, including the most recent Integrated Report, can be found [here](#). In addition, SCDHEC staff may consider implementation projects with a protection focus for high quality or threatened waters in the absence of a known impairment.

Contact the appropriate Watershed Manager for assistance in determining the specific water quality monitoring sites, impairments, and TMDL status for selected watersheds (contact information is located in [Section 1.15](#)). This information can also be found using the [SC Watershed Atlas](#) and SCDHEC's list of [Sites Covered Under an Approved TMDL and Corresponding WQ Attainment Status](#).

SCDHEC has several funding priorities:

- **Priority Watersheds:** Consideration will be given to any projects within these priority HUCs. While priority is given to projects within these watersheds, projects in other watersheds are highly encouraged. SCDHEC, EPA Region 4, and Natural Resources Conservation Service (NRCS) have established 14 priority watersheds across the state, including the following HUCs:
  - 030601 (Savannah)
  - 03050109 (Saluda)
  - 03050206 (Edisto)
  - 030502030305 (Edisto—Upper Caw Caw Swamp)
  - 030502040101 (Edisto—Headwaters South Fork Edisto)
  - 030502050108 (Edisto—Bush Branch-Four Hole Swamp)
  - 030502050302 (Edisto—Providence Swamp)
  - 030402011102 (Pee Dee—Smith Swamp)
  - 030402010809 (Pee Dee—Back Swamp)
  - 030502080606 (Salkehatchie—Okatie River)
  - 0305020902 (Santee—Bulls Bay)
  - 0305010115 (Catawba)

- 03050103 (Catawba)
  - 0305010401 (Catawba)
- **Protection:** While this solicitation invites proposals for the implementation of a watershed-based plan for a waterbody that is included on the most recent 303(d) list or has an approved TMDL, consideration will be awarded to any project that has a protection focus for high quality or threatened waters in the absence of or in addition to a known impairment.
  - **Provisional Water Classification:** Consideration will be awarded to any project with a provisional water classification of Outstanding Resource Water, Trout Water, or Shellfish Area. However, while priority is given to projects with these classifications, projects outside of these areas are also encouraged. Applicants can determine if their watershed has a provisional water classification by using the provisional water classification layer in the [SC Watershed Atlas](#) and should be sure to include this information in their initial proposal.
  - **Additional Funding Sources:** Consideration will be awarded to projects with other sources of funding above and beyond the required 40% match amount, and those with other federal sources which cannot be included in the match (See [Sections 1.8](#) and [1.10](#)).

NPS Staff will review all proposals to determine if any applicants and/or project cooperators have received or assisted with 319-funded projects in the past. Should an organization have been a part of a past project with documented non-compliance, points will be deducted from the overall score. Organizations with fully compliant past performance will not receive bonus points.

### **2.3 Project Length and Budget**

Projects may not exceed 36 months in length without prior permission and significant justification.

All project budgets must be developed using the following guidelines and included in the **final proposal**:

- Applicants must use the provided Excel table to develop a budget (the budget form and sample will be attached with the request to submit a final proposal).
- No maximum budget amount is specified in this solicitation; however, ALL costs must be justified. You must demonstrate why the amount applied for is necessary to meet the load reductions called for in your plan.
- Proposed budgets must designate 75% of the federal budget component to on-the-ground implementation of BMPs. This may include non-structural BMPs that promote behavior change specifically related to water quality improvements, such as promoting stronger ordinances or outreach campaigns. NPS staff will make this determination prior to submitting proposals to the Review Committee.
- A minimum of 40% of the total project cost must come from non-federal matching funds. The source of all matching funds must be clearly explained. See [Sections 1.8](#) and [3.8](#) for more information on matching funds.
- Personnel costs should be divided between administration and project management; administrative costs may not exceed 10% of the §319 request (CWA section 319(h)(12); 40 CFR 35.268). Administrative costs include salaries, overhead, or indirect costs for services provided and charged against general activities and programs carried out with the grant. Salary is not included if it's related specifically to implementation, outreach, or monitoring necessary for the project. The costs of enforcement and regulatory activities, education, training, technical assistance, technology transfer, and demonstration projects are not subject to the 10% limitation. No position included in this item can be a federally funded position.

Applicants should keep in mind that for landowners, participation with a project is voluntary. To this end, most applicants will elect to establish a cost-share program to assist landowners in installing BMPs and participating in the program. While this assists in providing for the overall project match, applicants should consider the economic situation of each target audience and plan to adjust cost-share rates accordingly, such as by developing a sliding scale. Failure to do so may result in low participation for certain BMPs, particularly septic system repairs.

## **2.4 Information/Education Component**

All proposals must include a robust and measurable information/education component that will be used to enhance public understanding of the problems the project is designed to address and to encourage their participation in implementing NPS management measures. This component should be targeted to the specific audiences contributing to the pollution source. For example, if you have identified cattle owners allowing livestock access to streams as a main contributor, your educational activities should be targeted to that audience, rather than a general or K-12 audience. Additional resources on this subject are provided in [Appendix 2](#).

## **2.5 Draft Documents**

NPS Staff and Watershed Managers are available to review draft proposals on a first-come, first-serve basis. Staff may also meet with applicants upon request. **Applicants are strongly encouraged to submit draft materials and to submit those materials *well before* the proposal deadlines to receive timely feedback.**

## **2.6 Review Criteria**

Applicants should be sure that it is clear what activities (BMPs) are to be completed, where they will be executed, and what education component will correspond to the work. The most successful projects will be able to demonstrate that the current funding request is part of a larger implementation effort. Applicants should include information on any additional work in the watershed relating to the watershed-based plan.

Following review and approval of the provided watershed-based plan, NPS Staff and the Review Committee will evaluate proposals with the following criteria:

- ✓ Does the proposal package follow instructions provided in the RFP?
- ✓ Does the proposal mention implementing all or a portion of a watershed-based plan that is limited to a reasonable geographic scope?
- ✓ Do the objectives of the project align with the plan for implementation?
- ✓ Does the lead organization demonstrate administrative capacity, expertise, and experience?
- ✓ Does the proposal provide a detailed description of the watershed and the water quality issues in the watershed (present and historical)?
- ✓ Will BMPs lead to significant pollutant load reductions? Are there a reasonable number of BMPs for the project length and scope? Is a BMP maintenance plan included for each? *"Show me a BMP that is not maintained, and I will show you a BMP that will fail."* - Dr. Bill Hunt, NC State University
- ✓ Does the proposal *clearly* define roles and responsibilities (appropriate use of committed partner organizations)? Is a letter of commitment included for each Confirmed Project Partner?
- ✓ Is the budget reasonable? Are all costs justified appropriately?
- ✓ Does the proposal include a robust and measurable education and outreach component targeted to specific audiences?
- ✓ Does the proposal demonstrate use and good understanding of all water quality monitoring data in the area?
- ✓ Does the proposal contain a general operation and maintenance (O&M) plan/agreement for each BMP type?
- ✓ Does the proposal contain all the required attachments in the specified format? (See [Section 4](#) Checklist)
- ✓ *If* revisions were requested on the initial proposal submission, does the proposal reflect such revisions?

## Section 3: Terms & Conditions of NPS Grant Awards

### 3.1 Administrative Capacity

A “Grantee” (grant recipient) must have administrative capacity to comply with the applicable requirements of federal “Uniform Administrative Requirements for Grants and Cooperative Agreements” (40 CFR Part 30 or 31) or “Uniform Administrative Requirements” (2 CFR Part 200 and 1500) and State requirements. Applicable federal requirements will be specified in an executed Grant Agreement. This includes, but is not limited to, managing allowable project costs, non-federal match, cost accounting and invoicing, audit procedures, records access, record keeping, sub-agreements, and progress reporting.

### 3.2 Grant Agreement

Grantees must enter into a written Grant Agreement with SCDHEC to establish mutually agreeable terms for completing the project. The Grant Agreement is in the form of a contract formatted according to standard SCDHEC contract procedures. **No changes may be made in regard to project timeframe, timeline, scope, milestones, or budget without prior approval** from the Nonpoint Source Coordinator to ensure that the Grantee does not violate or break the Grant Agreement. A sample grant agreement is available upon request.

### 3.3 Timely Implementation and Closeout

A Grantee is obliged to implement the project as planned according to the written milestones and close out the project in the timeframe outlined in the workplan. SCDHEC recognizes that unforeseen delays and extenuating circumstances sometimes occur that may require additional time to complete a project. **If any change to the timeframe, workplan, or budget is necessary, the Grantee must alert SCDHEC staff prior to alterations.** SCDHEC will evaluate the circumstances and determine whether to extend the project. Note that final financial paperwork and closeout reporting documents will be due 30 days after the close of the project. Up to ten percent of total federal funds may be withheld until all required final documents are received by SCDHEC. **No costs will be allowed after the close of the project;** hence potential grantees should plan to complete these requirements accordingly.

### 3.4 Pre-Award Costs

**No work on the project should occur before the Grantee signs a written Grant Agreement with SCDHEC.** SCDHEC is not liable for any cost incurred by the Grantee or any Grantee subcontractors prior to the contract effective date. SCDHEC cannot authorize any payments prior to final approval and signing of the Grant Agreement.

### 3.5 Reporting and Invoice Requirements

The Grantee agrees to submit interim **quarterly progress reports** and a **final closeout report** that evaluates the project and includes a plan for maintaining each BMP for the normal expected useful life of the practice. The evaluation is to include a critique of approaches that were used and recommendations for other similar projects. Grantees are also responsible for submitting **annual progress reports** to SCDHEC that are reported to the EPA. Grantees will also regularly submit additional project-specific information, such as information on each BMP installed and load reduction reports. All selected projects will also be subject to **on-site visits** by SCDHEC staff at least annually.

In addition to the quarterly progress reports, Grantees must also submit **invoices each quarter**. All receipts and records of grant funds (federal and match) spent must be submitted with each invoice. The Grantee also agrees to support minority and women-owned businesses whenever feasible and will **submit MBE/WBE (Minority Business Enterprise/Women Business Enterprise) forms every six months.**

It is very important that the Grantee maintain appropriate records and submit timely financial reimbursement requests and project reports. Failure to do so can result in non-compliance, which may result in remedial actions such as those listed below:

- Withholding payment until the condition complies
- Disallowing costs
- Suspending or terminating current award
- Withholding future awards

### **3.6 Fund Reimbursement**

**Grantees will be paid by reimbursement only.** Applicants should have funds available to cover costs each quarter while waiting for reimbursement. This includes the federal portion of any cost-shared BMP. Landowners should not be expected to cover the entire cost of the BMP and then wait for reimbursement from the grantee organization. Contact the 319 Grant Administrator for further questions and guidance on fund reimbursement.

### **3.7 Bids**

For any single item or expense that is \$10,000 or more, three bids are required by South Carolina's procurement code. This includes all contractual services. The Grantee's procurement code should also be followed.

### **3.8 Matching Funds or Services**

Match is the value of funds or services used to help conduct the project that is not borne by federal grant funds. These funds must come from non-federal sources. Match includes, but is not limited to, contributions of cash or value of services from individuals, organizations, municipalities, or non-federal public agencies. **Federally-funded projects or services cannot be used as match for NPS grants but should be referenced in the proposal.** (See [Sections 1.8](#) and [1.10](#))

Funds or services contributed to the project as matching funds or services must:

1. Be eligible under EPA National 319 Program Guidance (i.e. matching funds have the same requirements as federal funds)
2. Relate **directly** to the tasks in the project workplan
3. Be reasonably valued for the work performed
4. Be supported by documentation that is submitted with each quarterly invoice

Match may be cash or the value of "in-kind" non-cash contributions such as charges for equipment used on the project or the value of goods and/or services directly contributed to the project. Third party in-kind contributions may be provided by non-federally funded public agencies, organizations, or individuals. Volunteer services provided by individuals to the Grantee for project activities and travel costs may be valued as match at rates consistent with rates ordinarily paid by employers for similar work.

Examples of project actions that might be used as eligible project match include the following:

1. Cost of construction of approved BMPs (including labor, equipment, and materials)
2. Cost or "value-per-hour" rate multiplied by the number of hours of work performed to help carry out project workplan tasks, such as: serving on the project Steering Committee; writing, copying and mailing water quality publications or watershed newsletters; participating in project activities; providing training or workshop sessions; designing or reviewing BMP conservation plans; etc.
3. Value-per-hour rates for all volunteer services must be reasonably valued for the work performed. Information regarding *match activities* and current valuation of volunteer time, respectively, is available at the following pages:
  - [How to Provide Section 319 Non-Federal Match](#)
  - [Value of Volunteer Time](#)
4. Cost of travel - mileage rates must be in accordance with State reimbursement rates at the time of the travel. The 2021 rate is \$0.56 per mile
5. Cost of office or field equipment rentals and supplies used for the project

### **3.9 Environmental Data Quality Assurance**

**Projects under this solicitation should NOT include a monitoring component using federal or match grant funds. Funds outside of the grant may be used and are encouraged.** It is common for grantees to desire to include monitoring activities after the project starts. Using current monitoring programs, including volunteer monitoring, is encouraged to help evaluate the effectiveness of your BMPs.

Data collected outside of a DHEC approved Quality Assurance Project Plan (QAPP) cannot be considered for an impairment delisting. More information on QAPPs is available at the following links:

- [Quality Assurance Plans](#)
- [Guidance Document for Preparing QAPPs](#)

### **3.10 Food and Promotional Items**

Prior approval must be obtained if food or certain promotional items will be purchased with 319 funds. Contact the Nonpoint Source Coordinator to discuss these items.

### **3.11 GIS Requirements**

All selected projects that have a Geographic Information System (GIS) component must follow EPA/DHEC GIS guidance. Please contact your Watershed Manager prior to submitting GIS data to ensure the most current protocols are used.

### **3.12 Animal Feeding Operations (AFOs)**

Proposals that include programs or activities that assist AFOs must include a provision to ensure that any AFO that receives financial assistance pursuant to the grant has and will implement a comprehensive nutrient management plan as defined by EPA and SCDHEC.

### **3.13 Travel**

Travel expenses, including room and board, incurred in connection with the project will be limited to reimbursement at the standard government rate in effect **during the period of the project agreement** and will be included within the maximum amount of the contract. **The 2021 mileage rate is \$0.56 per mile.** Due to travel reimbursement policy changes made by the State of South Carolina, effective on July 1, 2006, the State standard rate for hotels will be at the established Federal Government Services Administration rate or below for the area of travel. These rates can be found [here](#).

### **3.14 Management Fees and Similar Charges**

Management fees or similar charges in excess of the direct costs and approved indirect rates are not allowable. The term “management fees or similar charges” refers to expenses added to the direct costs in order to accumulate and reserve funds for ongoing business expenses, unforeseen liabilities, or for other similar costs which are not allowable under this solicitation. This includes any mark up added to eligible costs.

### **3.15 Communication and Changes in Work**

Grantees will maintain an active cooperative working relationship with SCDHEC 319 Section staff. Grantees must ensure the Nonpoint Source Coordinator is informed of project activities and contact SCDHEC staff with any questions or concerns. **Grantees must notify the Nonpoint Source Coordinator as soon as possible if changes to the project workplan, scope of work, timeline, timeframe, or budget are needed to effectively conduct the project. Prior approval is required for all changes.** Grantees must notify the NPS Coordinator of any project personnel changes.

### **3.16 Project Monitoring**

The Nonpoint Source Coordinator will schedule office/field site visits at least once a year at the grantee’s office or comparable place of work to review project activities and progress. Grantees should be sure to document project work by taking before and after pictures of BMP installation. Progress and photos of Grantee work should be shared with 319 Staff at office visits. A site visit may also occur if public BMPs have been installed for the project. Observations and any recommendations for areas needing improvement will be recorded on a standard site visit form, which will be shared with the Grantee.

## Section 4: Proposal Checklists

Please use the following checklists to ensure you have included all required documents for this RFP:

### 4.1 Initial Proposal Checklist

**Initial proposals must be received by 3 PM on Friday, March 19, 2021.** Email your complete proposal to [NPSGrants@dhec.sc.gov](mailto:NPSGrants@dhec.sc.gov). Only emails sent to this address will be considered. Confirmation emails will be sent upon receipt of all proposals.

#### Required:

- Initial Proposal Form – Submit as a Word document, with all applicable sections completed
- Location Map\* - Submit as a PDF file. Provide a digitally-created location map of the project watershed or area with a legend on one page of 8.5"x11" paper clearly showing, at a minimum, the SCDHEC monitoring sites, waterbodies, towns, and watershed boundaries. SCDHEC monitoring sites should be labeled on the map and have a clear differentiation between unimpaired and impaired. Impaired sites should be clearly designated by impairment type. For projects near MS4 permitted coverage, the permit boundaries should also be included.
  - Entirely digitally-created
  - Fits on one whole page of 8.5"x11" paper
  - Clear and concise
  - Includes project watershed/area
  - Legend (includes SCDHEC monitoring sites, waterbodies, towns, watershed boundaries)
  - SCDHEC monitoring sites – Sites should be labeled on the map and have a clear differentiation between unimpaired and impaired; impaired sites should be clearly designated by impairment type. These designations may be specified through the required legend.
  - Waterbodies
  - Towns
  - Watershed boundaries
  - Does your project include an MS4 area?
    - No.
    - Yes.
      - If yes, did you include MS4 permit boundaries on the map *and* in the legend?
- Locally-Collected Data Map\* - Submit as a PDF file. *This map should look the same as the Location Map except that SCDHEC monitoring sites should be replaced with Locally-Collected Monitoring Sites.* Provide a digitally-created map of the project watershed or area with a legend on one page of 8.5"x11" paper clearly showing locally-collected monitoring sites along with the other required items from the Location Map. Locally-collected monitoring sites should be labeled on the map and have a clear differentiation between unimpaired and impaired. Impaired sites should be clearly designated by impairment type. The legend should also identify what entity collected which data. If available, provide the links to the data collected.
  - Entirely digitally-created
  - Fits on one whole page of 8.5"x11" paper
  - Clear and concise
  - Includes project watershed/area
  - Legend – includes Locally-collected monitoring sites, waterbodies, towns, watershed boundaries
  - Locally-collected monitoring sites – Sites should be labeled on the map and have a clear differentiation between unimpaired and impaired; impaired sites should be clearly designated by impairment type. Sites should also be identified by what entity collected which data. These designations may be specified through the required legend.
  - Waterbodies
  - Towns
  - Watershed boundaries
  - Links to data collected, if available
- Pollutant Sources Map\* - Submit as a PDF file. Provide a digitally-created map indicating targeted pollutant sources within the project watershed or area on one page of 8.5"x11" paper.
  - Entirely digitally-created
  - Clear and concise
  - Fits on one whole page of 8.5"x11" paper
  - Indicates targeted pollutant sources within the project watershed/area, including confirmed/potential landowners from chart in initial proposal if applicable

- Legend included
- Watershed-Based Plan – If a watershed-based plan has already been completed for the project area, it should also be submitted with the proposal form. If the plan is available online, applicants may simply provide a weblink. If the watershed-based plan is in final development, a draft should be submitted. If selected during the initial proposal phase, a completed watershed-based plan must be submitted with the final proposal.
- Commitment Letters – Submit as a PDF file. Did you include a Commitment Letter from each Confirmed Project Partner you listed above and/or Confirmed Landowner/Farmer? (*Note: for Confirmed Landowners/Farmers, an application, commitment letter, or other similar commitment document may suffice. You may contact the NPS Coordinator with any questions or concerns.*)
- Does your project include an MS4 area?
  - No.
  - Yes.
    - *If yes, did you include a Letter of Assurance? – Submit as a PDF file. Applicants must include a signed Letter of Assurance on official letterhead verifying that activities proposed for a 319(h) project represent practices that are “above and beyond” NPDES permit requirements and **will not be counted as compliance in any NPDES permit reports.***

Highly Encouraged:

- Priority Areas Map\* - Submit as a PDF file. Provide a digitally-created map indicating identified priority areas for specific BMP implementation within the project watershed or area on 8.5”x11” paper. This may require several pages if multiple BMPs are planned. (I.e. If the proposal is for septic and agriculture, one map should indicate identified priority areas for septic repair/replacement within the watershed and a second map should indicate identified priority areas for agriculture BMPS within the watershed.)
  - Entirely digitally-created
  - Clear and concise
  - Indicates identified priority areas for specific BMP implementation within the project watershed/area
  - Legend included
  - Fits on whole 8.5”x11” paper. This may require several pages if multiple BMPs are planned. (*I.e. If the proposal is for both septic and agriculture, one map should indicate identified priority areas for septic repair/replacement within the watershed and a second map should indicate identified priority areas for agricultural BMPS within the watershed.*) *This may also include confirmed/potential landowners from chart in initial proposal if applicable.*

NOTE:

*\*All maps should have the same base layer. As such, they should be able to be superimposed over one another and have all base items align.*

## 4.2 Final Proposal Checklist

**Eligible Applicants Only.** Due 6 weeks after invitation to submit—approximately May 28, 2021. **Must be received by 3 PM.** Email your complete final proposal to [NPSGrants@dhec.sc.gov](mailto:NPSGrants@dhec.sc.gov). Only emails sent to this address will be considered. Confirmation emails will be sent upon receipt of all proposals.

### Required:

- **Final Proposal Form** – as a **Word document**, with all applicable sections completed
- **Attachment A:** Budget Chart – as an **Excel document**, with all applicable sections completed
- **Attachment B:** Watershed-Based Plan – this must be a fully completed document with all nine elements; include a weblink or the entire plan as an attachment
- **Attachment C:** Required Maps\*
  - Location Map\* - Submit as a **PDF file**. Provide a digitally-created location map of the project watershed or area with a legend on one page of 8.5"x11" paper clearly showing, at a minimum, the SCDHEC monitoring sites, waterbodies, towns, and watershed boundaries. SCDHEC monitoring sites should be labeled on the map and have a clear differentiation between unimpaired and impaired. Impaired sites should be clearly designated by impairment type. For projects near MS4 permitted coverage, the permit boundaries should also be included.
    - Digitally-created
    - Fits on one page of 8.5"x11" paper
    - Includes project watershed/area
    - Legend (includes SCDHEC monitoring sites, waterbodies, towns, watershed boundaries
    - SCDHEC monitoring sites – Sites should be labeled on the map and have a clear differentiation between unimpaired and impaired; impaired sites should be clearly designated by impairment type. These designations may be specified through the required legend.
    - Waterbodies
    - Towns
    - Watershed boundaries
    - Does your project include an MS4 area?
      - No.
      - Yes.
        - *If yes, did you include MS4 permit boundaries on the map and in the legend?*
  - Locally-Collected Data Map\* - Submit as a **PDF file**. *This map should look the same as the Location Map except that SCDHEC monitoring sites should be replaced with Locally-Collected Monitoring Site.* Provide a digitally-created map of the project watershed or area with a legend on one page of 8.5"x11" paper clearly showing locally-collected monitoring sites along with the other required items from the Location Map. Locally-collected monitoring sites should be labeled on the map and have a clear differentiation between unimpaired and impaired. Impaired sites should be clearly designated by impairment type. The legend should also identify what entity collected which data. If available, provide the links to the data collected.
    - Entirely digitally-created
    - Fits on one whole page of 8.5"x11" paper
    - Clear and concise
    - Includes project watershed/area
    - Legend – includes Locally-collected monitoring sites, waterbodies, towns, watershed boundaries
    - Locally-collected monitoring sites – Sites should be labeled on the map and have a clear differentiation between unimpaired and impaired; impaired sites should be clearly designated by impairment type. Sites should also be identified by what entity collected which data. These designations may be specified through the required legend.
    - Waterbodies
    - Towns
    - Watershed boundaries
    - Links to data collected, if available
  - Pollutant Sources Map\* – Submit as a **PDF file**. Provide a digitally-created map indicating targeted pollutant sources within the project watershed or area on one page of 8.5"x11" paper.
    - Entirely digitally-created
    - Clear and concise

- Fits on one whole page of 8.5"x11" paper
  - Indicates targeted pollutant sources within the project watershed/area, including confirmed/potential landowners from chart in initial proposal if applicable
  - Legend included
- OPTIONAL, but highly encouraged: Priority Areas Map\*
  - Digitally-created
  - Indicates identified priority areas for specific BMP implementation within the project watershed/area
  - Fits on 8.5"x11" paper. This may require several pages if multiple BMPs are planned. *(I.e. If the proposal is for both septic and agriculture, one map should indicate identified priority areas for septic repair/replacement within the watershed and a second map should indicate identified priority areas for agricultural BMPS within the watershed.)*

Required:

- **Attachment D: Commitment Letters** – Submit as a PDF file. Did you include a Commitment Letter from each Confirmed Project Partner you listed above and/or Confirmed Landowner/Farmer? *(Note: for Confirmed Landowners/Farmers, an application, commitment letter, or other similar commitment document may suffice. You may contact the NPS Coordinator with any questions or concerns.)*
- Does your project include an MS4 area?
  - No.
  - Yes. **Attachment E: Letter of Assurance**
    - Did you include a Letter of Assurance? Applicants must include a signed Letter of Assurance on official letterhead verifying that activities proposed for a 319(h) project represent practices that are “above and beyond” NPDES permit requirements and will not be counted as compliance in any NPDES permit reports.
- **Attachment F: Additional Information for Indirect Billing** – A grantee intending to claim indirect costs must provide documentation and confirmation in writing to SCDHEC’s §319 Grant Program that they operate according to an “indirect cost rate proposal” that conforms to the applicable “Cost Principles” established under either OMB Circulars A-21, A-87, and A-22, or 2 CFR 200 Subpart E (applicable principles will be specified in an executed grant agreement). A copy of the current approved indirect rate agreement from the appropriate federal cognizant organization must be attached with any proposal including indirect costs. **This applies to both the lead organization and cooperators.**

NOTE:

*\*All maps should have the same base layer. As such, they should be able to be superimposed over one another and have all base items align.*

## Appendix 1: Required Nine Elements of Watershed-Based Plans

SCDHEC can only use 319 funds to implement efforts that are tied to approved watershed-based plans. Those plans must include the following nine elements outlined by EPA. NPS staff must review and approve the watershed-based plan. Plans which included these nine elements must be submitted prior to or with the final proposal package. To expedite watershed-based plan reviews, applicants must complete the table of Watershed-Based Plan Required Elements found in the initial proposal form. SCDHEC has also developed a [Simplified Guide to Developing Watershed Based Plans](#).

Abbreviated Element	Full Element Text from EPA Guidance
a. Identification of pollutant sources and their causes.	a. An identification of the causes and sources or groups of similar sources that will need to be controlled to achieve the load reductions estimated in this watershed-based plan (and to achieve any other watershed goals identified in the watershed-based plan), as discussed in item (b) immediately below. Sources that need to be controlled should be identified at the significant subcategory level with estimates of the extent to which they are present in the watershed (e.g., X number of dairy cattle feedlots needing upgrading, including a rough estimate of the number of cattle per facility; Y acres of row crops needing improved nutrient management or sediment control; or Z linear miles of eroded streambank needing remediation).
b. Estimated load reductions from management measures identified in (c). (May also include overall pollutant reduction needed as found in a TMDL document.)	b. An estimate of the load reductions expected for the management measures described under paragraph (c) below (recognizing the natural variability and the difficulty in precisely predicting the performance of management measures over time). Estimates should be provided at the same level as in item (a) above (e.g., the total load reduction expected for dairy cattle feedlots; row crops; or eroded streambanks).
c. Management measures (Best Management Practices, or BMPs) needed in order to eliminate or control pollutant(s)	c. A description of the NPS management measures that will need to be implemented to achieve the load reductions estimated under paragraph (b) above (as well as to achieve other watershed goals identified in this watershed-based plan), and an identification (using a map or a description) of the critical areas in which those measures will be needed to implement this plan.
d. Identification of funding and technical assistance needs as well as potential sources. Example: Watersheds with agricultural sources would most likely require the expertise of USDA Natural Resources Conservation Service staff and could potentially utilize Environmental Quality Incentive Program funds for implementation.	d. An estimate of the amounts of technical and financial assistance needed, associated costs, and/or the sources and authorities that will be relied upon, to implement this plan. As sources of funding, States should consider the use of their Section 319 programs, State Revolving Funds, USDA's Environmental Quality Incentives Program and Conservation Reserve Program, and other relevant Federal, State, local and private funds that may be available to assist in implementing this plan.

<p>e. Outreach strategy that is targeted towards members of the public that are impacted by the project and the management measures from (c).</p>	<p>e. 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.</p>
<p>f. Timeline of implementation events that proceeds in a logical and efficient manner.</p>	<p>f. A schedule for implementing the NPS management measures identified in this plan that is reasonably expeditious.</p>
<p>g. List of milestones for keeping plan implementation progress on track.</p>	<p>g. A description of interim, measurable milestones for determining whether NPS management measures or other control actions are being implemented.</p>
<p>h. Criteria to determine if pollutants are being reduced and progress is being made toward attaining water quality standards, or if plan requires revision.</p>	<p>h. A set of criteria that can be used to determine whether loading reductions are being achieved over time and substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether this watershed-based plan needs to be revised or, if a NPS TMDL has been established, whether the NPS TMDL needs to be revised.</p>
<p>i. Monitoring strategy to determine effectiveness of plan implementation.</p>	<p>i. A monitoring component to evaluate the effectiveness of the implementation efforts over time, measured against the criteria established under item (h) immediately above.</p>

## Appendix 2: Developing *Measurable* Outreach Using Social Marketing Principles

The primary goal of the South Carolina NPS Grant Program is to restore or protect waterbodies. NPS Projects focus a considerable portion of their efforts and budgets on implementing BMPs to achieve significant pollutant load reductions in a given watershed. However, these projects must also include activities to help promote the project, raise public awareness, and/or change behavior. This outreach is a vital component of any effort to address NPS pollution. It can attract participants from your communities to take part in any cost-sharing programs and encourage people to make better choices for improving water quality.

Polluted runoff typically comes from many of the choices people make from all walks of life. Therefore, improving water quality often requires successfully identifying key behaviors or practices that people can adopt and persuading them to adopt those behaviors. We can do this in many ways, such as by installing BMPs, leading tours, holding meetings/workshops, or making a brochure/factsheet. But how often have we stopped to evaluate if our outreach programs are meeting our goal of getting people to use or install *and maintain* a BMP? For example, can we say because of a project we have increased the number of dog owners who pick up their pet's waste by a certain percentage?

This is where **social marketing** comes in. While traditional outreach may have been focused on using education to make people aware of problems, social marketing focuses on getting people to exchange old, undesirable behaviors for new, better behaviors.

### What Is Social Marketing?

**The aim of social marketing is to convince people—by creatively using persuasion—to give up undesirable behaviors in exchange for good behaviors.** It has been said that education ends when the audience knows what you want them to know, but social marketing only ends when the audience does what you want them to do.

**Education** ends when the audience **knows** what you want them to know.

**Social Marketing** only ends when the audience **does** what you want them to do.

Based on general marketing principles, social marketing tries to “sell” good behaviors by making them more appealing than the undesirable behaviors. When you use social marketing, you need to think about:

- **Product** – You are trying to “sell” a set of good behaviors.
- **Cost** – What will it cost people to give up the undesirable behaviors and adopt the good behaviors? What is it costing people to do the undesirable behaviors and not adopt the good behaviors? *This is more than just money.* The cost of adopting a new behavior can include costs like learning how to do the new behavior properly, the extra time a new behavior might take, and of course the dollar cost. **The cost of doing the undesirable behavior may be something people are not aware of until you point it out.** For example, giving cows access to streams can cause them to get sick, so the cost of that behavior is poor herd health.
- **Appeal** – Develop a campaign that makes the good behavior appealing to your audience. This can include efforts to take away some of the costs of doing the good behavior and efforts to point out how much the undesirable behavior actually costs. **Make sure these efforts are based on costs your audience really cares about.**
- **Delivery** – Promote the message where your audience is likely to hear or see it, and use a trusted, local source to speak your message. **Having someone who knows the area and the people in the area you are trying to reach can be crucial, particularly for septic and agriculture projects.**

*Getting Your Feet Wet with Social Marketing* is a great tool for incorporating social marketing principles into watershed programs and can be found [here](#).

The table below describes the steps for developing a social marketing campaign. You might find it useful when crafting your 319 proposals. The following pages include examples of how an outreach campaign might be developed for improving water quality using the steps. These are EXAMPLES only and should not be copied directly into your proposal.

When to Complete	Social Marketing Steps for 319 Proposals
For proposal	<b>1. Identify the problem</b> The pollutant of concern your project is addressing
For proposal	<b>2. Set your goal</b> The overall vision you are working towards
For proposal	<b>3. Identify undesirable behaviors contributing to the problem</b> What people are doing wrong
For proposal	<b>4. Identify good behaviors to reduce contributions to the problem</b> What you want people to do – KEEP IT SIMPLE
For proposal	<b>5. Get to know your audience</b> Who is doing the undesirable behavior and should be doing the good behavior
After award	<b>6. Collect information on audiences</b> Can be collected through surveys, interviews, focus groups, etc. <ul style="list-style-type: none"> <li>• Where do they get their information or how can you reach them?</li> <li>• What are they doing now?</li> <li>• What are their barriers to adopting the good behavior?</li> <li>• What would reduce the barriers or motivate them to adopt the good behavior?</li> <li>• Who is a trusted source who can influence them to change their behaviors?</li> </ul>
After award	<b>7. Set your objectives</b> What you will measure for success should be: <ul style="list-style-type: none"> <li>• Specific – focused on one thing</li> <li>• Measurable – you have a plan to quantify it</li> <li>• Audience-based – one audience is targeted</li> <li>• Realistic – you can get it accomplished</li> <li>• Time-bound – you will accomplish it in a specific amount of time</li> </ul>
After award	<b>8. Develop messages and a program/campaign based on objectives</b> Messages should reflect: <ul style="list-style-type: none"> <li>• Motivators that will make the good behavior appealing and the undesirable behavior unappealing</li> <li>• Removing or overcoming barriers to adopting the good behavior</li> </ul> Program/ campaign should be delivered: <ul style="list-style-type: none"> <li>• Where audiences will get the message</li> <li>• Using trusted sources for information</li> </ul>
After award	<b>9. Implement the program</b> Follow the plan to meet the objectives. Revise plan if needed to better reach audience.
After award	<b>10. Evaluate the program</b> Measure whether the objectives are being attained.

**Social Marketing Steps Example: CATTLE FARMERS\***

<b>1. Identify the problem</b>	Our Favorite Creek has high fecal counts
<b>2. Set your goal!</b>	Reduce fecal pollution in Our Favorite Creek
<b>3. Identify undesirable behaviors</b>	Farmers allowing livestock in streams
<b>4. Identify good behaviors</b>	<ul style="list-style-type: none"> <li>• Install fencing and alternative water sources</li> <li>• Maintain all installed BMPs so they continue working properly</li> </ul>
<b>5. Identify target audiences</b>	<ul style="list-style-type: none"> <li>• Professional farmers</li> <li>• Hobby farmers</li> </ul>
<b>6. Get to know your audiences</b>	<p>Surveys, focus groups, or interviews with local hobby farmers at feed store reveals:</p> <ul style="list-style-type: none"> <li>• Many listen to local radio stations</li> <li>• Many get information about their animals from local feed store</li> <li>• Many do not have stream fencing because: <ul style="list-style-type: none"> <li>○ Too expensive</li> <li>○ Do not know why they would need it</li> </ul> </li> <li>• Many would consider installing fencing if: <ul style="list-style-type: none"> <li>○ Knew where to install it and could install it themselves</li> <li>○ Had cost share assistance</li> <li>○ Knew it improved herd health</li> </ul> </li> <li>• Many trust the local extension agent</li> </ul>
<b>7. Set your objectives!</b>	<ul style="list-style-type: none"> <li>• <b>Objective 1:</b> Recruit 10% of the local hobby farmers in the area to participate in the installation/education cost-sharing program within 2 years (Measure: track participation level)</li> <li>• <b>Objective 2:</b> 90% of hobby farmers involved in cost-share program will understand how to maintain their installed BMPs (Measure: survey following installation/education program)</li> <li>• <b>Objective 3:</b> 90% of hobby farmers involved in cost-share program will believe it is important to maintain their BMPs (Measure: survey following installation/education program)</li> </ul>
<b>8. Develop a program based on objectives</b>	<ul style="list-style-type: none"> <li>• Local hobby farmers will be recruited to participate in the installation/education cost-sharing program through events held at the local feed stores. The local extension agent will be present to encourage participation.</li> <li>• Develop informational brochures and training program for BMP maintenance to be given during installation/education program.</li> </ul>
<b>9. Implement the program</b>	Recruit farmers and deliver the program.
<b>10. Evaluate the program</b>	<ul style="list-style-type: none"> <li>• Participation level was tracked – Objective 1: 11% participated</li> <li>• Surveys were given to participants – Objective 2: 93% correctly answered maintenance quiz Objective 3: 98% indicated maintaining BMPs is important</li> </ul>

\*Only for example. Your program should reflect local needs.

## Social Marketing Steps Example: SEPTIC TANK USERS\*

<b>1. Identify the problem</b>	Our Favorite Creek has high fecal counts
<b>2. Set your goal</b>	Reduce fecal pollution in Our Favorite Creek
<b>3. Identify undesirable behaviors</b>	Lack of septic maintenance leads to failing septic systems
<b>4. Identify good behaviors</b>	<ul style="list-style-type: none"> <li>• Fix failing septic systems</li> <li>• Maintain working septic systems through regular servicing</li> </ul>
<b>5. Identify target audiences</b>	<ul style="list-style-type: none"> <li>• Homeowners with septic tanks</li> <li>• Property managers with septic tanks</li> </ul>
<b>6. Get to know your audiences</b>	<p>Surveys, focus groups, or interviews with members of local churches or grocery store shoppers:</p> <ul style="list-style-type: none"> <li>• Many read the local section of the newspaper</li> <li>• Many get information about their septic tanks from friends, relatives and local hardware store</li> <li>• Many do not pump regularly because: <ul style="list-style-type: none"> <li>○ Do not know when to pump</li> <li>○ Think using septic additive means they will not have to pump</li> </ul> </li> <li>• Many would consider pump regularly if: <ul style="list-style-type: none"> <li>○ Knew it was not too expensive</li> <li>○ Knew when to do it</li> </ul> </li> <li>• Many would not trust local septic contractors</li> <li>• Many do trust a septic inspector</li> </ul> <ul style="list-style-type: none"> <li>• Many have not gotten their failing septic fixed because: <ul style="list-style-type: none"> <li>○ Too expensive</li> <li>○ Did not know it was failing</li> </ul> </li> <li>• Many would consider getting it fixed if: <ul style="list-style-type: none"> <li>○ Knew it affected their family's health</li> <li>○ Had cost share assistance/ payment plan</li> </ul> </li> </ul>
<b>7. Set your objectives</b>	<ul style="list-style-type: none"> <li>• <b>Objective 1:</b> Recruit 30 failing septic households into cost share (Measure: track participation level)</li> <li>• <b>Objective 2:</b> 90% of participating heads of households will understand when to get their septic systems regularly serviced (Measure: survey following installation/education program)</li> <li>• <b>Objective 3:</b> 90% of participating heads of households will believe it is important to maintain their septic systems (Measure: survey following installation/education program)</li> </ul>
<b>8. Develop a program based on objectives</b>	<ul style="list-style-type: none"> <li>• Local homeowners with failing septic systems will be recruited to participate in the installation/education cost-sharing program through events held at local churches and hardware stores. The local septic inspector will be present to encourage participation.</li> <li>• Use existing informational brochures and develop training program for septic system maintenance to be given during installation/education program.</li> </ul>
<b>9. Implement the program</b>	Recruit failing septic owners and deliver the program.
<b>10. Evaluate the program</b>	<ul style="list-style-type: none"> <li>• Participation level was tracked – Objective 1: 28 households participated</li> <li>• Surveys were given to participants – Objective 2: 91% correctly answered maintenance quiz Objective 3: 95% said maintaining septic system is important</li> </ul>

\*Only for example. Your program should reflect local needs.