

Near-term Actions to Support Environmental Justice in the Nonpoint Source Program

Partnerships, Planning, and Funding Workgroup

Report

1. Executive Summary:

In fiscal year (FY) 2022, EPA's national Nonpoint Source (NPS) program is engaging State, Territory, and Tribal §319 grantees, as well as the broader NPS community, to identify and discuss opportunities to advance equity and environmental justice in the program.¹ This workgroup was formed to discuss challenges and barriers that may be impacting Disadvantaged Communities (DACs) during the process of applying for, managing, and implementing a §319 (h) grant and maintain program efforts to meet clean water goals over time. The workgroup was comprised of EPA staff from Headquarters and three regions, NPS staff from nine states, and five Tribal representatives. The workgroup met five times between April and June 2022 to discuss challenges and solutions for supporting DACs in NPS efforts, including in the application process, in meeting match requirements, and for program coordination. The following are some key workgroup suggestions for EPA consideration and action:

Short Term Suggestions:

- **Advance pilot projects** for (1) pre-award and (2) post-award support for grantees and sub-grantees that will gather insights on and help support efforts to remove barriers and challenges in the application process.
- **Provide clarification and/or guidance on subrecipient eligibility** that may allow additional funding opportunities to DACs.
- **Provide an ongoing forum** for topic-driven small group discussions with mix of grantee types from different geographic areas to continue dialogue and further program to support DAC.

Long Term Suggestions:

- **Outline and communicate approaches that states could use as match waiver for DACs.** This could include factsheets on effective approaches (ex. SRF recycled funds) for states to facilitate match reduction or waivers for qualifying DACs.
- **Evaluate existing grant guidelines** and explore potential flexibilities to meet both community priorities and water quality goals.
- **Advising grantees on approaches to direct outreach to DACs,** including application notices and communications that would allow targeted support and discussions with DACs.

¹ EPA recognizes the diversity of terms that Tribal partners use to self-identify, particularly in the context of working with the US federal government and other external partners. For the purposes of this document, Tribe is used as a collective term encompassing federally recognized Tribes, Nations, Pueblos, and other entities currently eligible under CWA §319.

2. Workgroup Description:

The Partnerships and Funding workgroup focused on identifying potential opportunities to leverage partnerships and funding sources within Federal and state programs to alleviate barriers to participation in the §319 (h) grant program for disadvantaged Communities (DACs). The workgroup met five times between April 6 and June 8, 2022. Topics for discussion were organized as follows:

- Application challenges
 - Options and approaches that have worked well for grantees
 - Options and approaches to reduce challenges that grantees would like to explore/evaluate
- Partnerships and Communication
 - Balancing competing interests and priorities
 - Outreach and communication
 - Match
- Sustaining the effort
 - Agency coordination (all levels)
 - Cross program collaboration

The Partnerships and Funding Workgroup discussions were synthesized by EPA to highlight practices currently implemented by grantees, potential solutions to challenges, and suggestions for EPA to consider when addressing NPS program equity gaps. Suggestions are grouped into short-term (1 year) and long-term (2-3 year) actions.

3. Workgroup Members:

Name	Affiliation	Email
Alex Wong	Maine DEP	alex.wong@maine.gov
Amanda Reed	EPA Region 7	reed.amanda@epa.gov
Angie Brown	Indiana DEM	abrown@idem.IN.gov
Cyd Curtis	EPA HQ	Curtis.cynthia@epa.gov
Darryl Williams	EPA Region 4	williams.darryl@epa.gov
Don Waye	EPA HQ	waye.don@epa.gov
Eliza Keeley-Arnold	WA State Department of Ecology	ekee461@ecy.wa.gov
Ferry Akbar Buchanan	EPA Region 3	AkbarBuchanan.Ferry@epa.gov
Hannah Sanders	EPA Region 3	sanders.hannah@epa.gov
Illeana Alexander	CTCLUSI	ialexander@ctclusi.org
Jerry W Cain	Mississippi Band of Choctaw Indians	Jerry.cain@choctaw.org
Joy Hinkle	Georgia EPD	joy.hinkle1@dnr.ga.gov
Mahtaab Bagherzadeh	Kentucky Division of Water	mahtaab.bagherzadeh@ky.gov
Malcolm M Harper	Massachusetts	Malcolm.Harper@mass.gov
Margot Buckelew	EPA HQ	Buckelew.margot@epa.gov
Megan Gilmore	Montana	meagan.gilmore@mt.gov
Mikayla Kerron	Prairie Band Potawatomi Nation	mikaylakerron@pbpnation.org

Ryan Macintosh	Santa Rosa Rancheria	RMacintosh@tachi-yokut-nsn.gov
Steve Landry	New Hampshire DES	stephen.c.landry@des.nh.gov
Valerie Streeter	Tulalip Tribes	vstreeter@tulalipTribes-nsn.gov

4. Discussion Topics:

In previous efforts and during the winter 2022 grantee listening sessions, the HQ equity team noted common challenges and barriers that grantees were encountering with regards to increasing engagement with DACs. Themes that emerged included:

- Applications and projects generally come from the same entities year after year.
- Communities may not know about the §319 program or how to apply.
- Communities often don't have the capacity to manage a project or a grant.
- Communities don't meet requirements to receive or manage federal funds.
- Match requirements are a significant barrier overall.
- There may not be capacity or funding support for maintaining BMPs and monitoring projects.
- Navigating the requirements of federal grants from different programs can be overwhelming.

Challenge: Knowledge of funding programs and the skill of applying has a high administrative burden. Communities may not be able to organize all the required materials and shepherd a project through the necessary steps of pre-funding preparations. Furthermore, it can be difficult to meet the qualifications to be eligible or complete the requirements after receiving funding. Staff turnover at the grantee or community level can also further complicate this as each new person needs to relearn.

These themes were a starting point for discussions on other barriers that may be present for DACs. Workgroup members discussed their experiences and provided additional details on why it is difficult for communities to engage with throughout the §319 grant process. Below are details from the workgroup discussions on the main challenges and approaches that have been tested.

5. Section §319 Applications and Community Priority Challenges:

5.1: Community Capacity

Challenge: Knowledge of funding programs and the skill of applying has a high administrative burden. This can result in generally receiving the same pool of applicants year after year. Communities may not be able to organize all the required materials and shepherd a project through the necessary steps of pre-funding preparations. Furthermore, it can be difficult to meet the qualifications to be eligible or complete the requirements after receiving funding.

Additionally, staff turnover at the grantee or subrecipient level, and fluctuating level of individual engagement from community leaders can cause a lack of continuity and stability. This can further slow or hinder the process during the period of relearning of knowledge and rebuilding of relationships.

5.2 Balancing Community Priorities

Challenge: Nonpoint source programs prioritize work that maximizes water quality improvements. Community members, however, may have more urgent needs such as food sovereignty, public health, or recreational access, and may not be interested to engage on a §319 project that is centered on water

quality benefits. Furthermore, project locations, state identified priorities, and disadvantaged communities may not be aligned.

Challenge: Workgroup members also indicated the importance of identifying needs that may differ in rural, urban and coastal DACs. The best way to approach problem solving in each area varies, for example in urban areas, solutions (and funding) may be largely municipality driven, while in agricultural areas it is largely landowner driven. This can be challenging to communicate with the range of stakeholders and to address their needs adequately.

5.3 *Addressing Challenges:*

Workgroup members shared and discussed grantee approaches to support and engage communities in the NPS Program and Grant process.

5.3.1 Pre-Application Workshops

Grantee support to communities in application development has improved quality of proposed projects and diversity of applicant pool.

- **Maine** has offered application workshops to help support application development.
 - Workshops have included support for both 604(b) and §319
 - Workshop materials (resource pending)
 - Additionally, §319 program staff support potential applicants in advance of application submittal
- **Washington:** Conducts 4 workshops around the state (and now virtually) that help to bring in potential applicants; applicants are broken out by project type and staff walk them through the process including materials, application, and tips for submitting a strong application.

Additionally, one of the WA state regions provides a Notice of Intent process to engage with potential applicants before they apply. The region then coordinates internal feedback with TMDL leads and nonpoint specialists to assist applicants with developing more robust projects and proposals.

- [Workshop materials](#)
- [Applicant Prep Tool](#) available online
- Matrix of contacts for each step of the process (in development)
- Budget template (in development)

5.3.2 Individual / Applicant Direct Support: State grantees may support communities effectively by providing one-on-one support and review of applications or project proposals.

- **New Hampshire** did not see good attendance from application workshops historically but shifted to a pre-application process for Watershed Assistance Grants in 2006 for the FY07 grants cycle.
 - Applicants are required to contact the agency to review their proposal before it is submitted. This has helped to improve the quality of applications and communicate information about the program and eligibility requirements.
 - [Pre-Proposal Information form](#)
 - [Watershed Assistance Grants information packet](#)

- **Georgia** historically used to require all applicants to come to Atlanta for an in-person pre-application meeting. However, this presented a barrier to many communities, even non-DAC. Now, GADEP conducts online workshops and encourages (not required) pre-application meetings with staff (especially for first time applicants).
- **Massachusetts** allows for applicants to submit proposals ahead of time for feedback but has not had significant participation potentially because of outreach challenges.
 - The workgroup discussed the value of ensuring equitable outreach but was not able to share any successful examples.
- One-on-one support from state project managers, basin coordinators etc.
- Utilizing “circuit riders” improve targeting and support for areas of interest
- Maine utilized social marketing approaches (details pending)

5.3.3 Post-award support for reporting requirements:

- New Hampshire has held a round table forum for managers to focus on reporting requirements
 - [Workshop materials](#)

5.3.4 Providing a local coordinator in each situation can help bridge gaps and build trust. Some states are investing in staff with local presences, like basin or regional coordinators.

- **Washington’s** eastern region is structured that NPS staff are also the TMDL leads for a specified sub-set of counties organized around watersheds. This has allowed there to be one point of contact in multiple water quality improvement processes which has helped to build trust with local communities. Furthermore, being located within the communities helped the state staff to understand the complex social and economic dynamics of the area and to tailor projects that were more accepted by the community. The region has also seen success working with Tribes in this area.
- **Michigan** assigns a technical assistance point person to each district in the state. Technical assistance staff are involved with outreach, support, site visits, and idea development for competitive proposal.
- **Kentucky** is divided into 7 major river basins, each of which is staffed by a Basin Coordinator. The Basin Coordinators provide watershed capacity development and §319 project support, priority watershed planning, support watershed plan development and implementation, facilitate education and outreach material and events, and assist with volunteer sampling programs throughout their basin. Since each basin varies in water quality needs, each Basin Coordinator is the point of contact for that region of the state and provides improved communication between the Kentucky Division of Water and local stakeholders.
- Workgroup members suggested aligning priorities for agencies and DAC communities could be achieved with additional flexibilities and through projects with goals beyond water quality improvements.
 - New Hampshire: In small, rural communities the state has used the cost of maintaining dirt and gravel roads as an incentive to install BMPs that make the roads more stable and require less maintenance over time.

- The Tulalip Tribes expressed that they would like to work on challenges that are arising originally from the community – such as food access, diet, and health. However, BMPs that qualify and address these concerns are limited; rain barrels have been the only avenue so far.
 - There could be potentially a big nexus between water quality improvements and community goals, but the grants guidelines may not be conducive.
 - For example, a community garden could also include water management design elements, and if accepted as a BMP, could help meet community priorities for food sovereignty.

“More staff that have more personal relationships with grantees to help walk through the process would address limited capacity and knowledge gaps on the grantee end. Hand holding is time consuming, but it helps!”

6. Match Requirements and Challenges:

The 40 percent non-federal match requirement can be a high barrier for DACs. If a state does not have the ability to internally provide sufficient match funds for all their §319 projects, match requirements are passed to the sub-grantees. While local involvement and buy-in is important, achieving this level of match can be a barrier to a DAC applying for a §319 grant.

Additional challenges workgroup members raised:

- Mismatched timelines between grant applications and funding cycles that generate eligible match,
- Match or projects getting voted down by local municipalities,
- Documenting and tracking of in-kind services can be burdensome.
 - Also, sub-recipients in DACs may not be fully aware of what can be counted as in-kind, which may result in some options of in-kind not being fully utilized.
 - Staff turnover can also mean that a significant amount of time may be spent reintroducing and relearning the various mechanisms for in-kind match.

6.1 Meeting Match:

6.1.1 Approaches that have been tried:

- **Utilizing the value of Land and of land donation to meet match requirements can be helpful,** but the difficult administration of transactions like this may outweigh the benefits.
- **Funding drives** from local associations, watershed groups
- **Conservation funds** supported by license plate fees. However, it can be challenging for the grantee to managing two funds.
 - Example: In the past, NHDES has served as the grant applicant for Moose Plate Conservation Fund grants to supplement project budgets and secure match. This took the burden off our grantees.
- **Recycled Clean Water State Revolving Funds (SRF):** see below for detailed discussion on SRF as match.
- **Universities** can provide qualifying assistance to nearby communities through MOUs or other mechanisms. For example, Region 4 established the [Colleges/Underserved Community](#)

[Partnership Program](#) (CUPP) in 2011, and it has since been implemented with partners in other regions. The goal of the program is to provide a creative approach to partnering and delivering technical assistance to underserved communities. The program enlists colleges and universities to assist these communities through student internships, practicums, and capstone projects. Communities receive vital assistance and services on a voluntary basis and at no cost. Students gain practical experience in developing solutions to enhance the quality of life for communities. They generally receive academic credit for their efforts. The program was originally an Environmental Justice program started in the Office of Civil Rights so there are a wide range of projects that have been completed.

- Examples of Water related CUPPs:
 - **Water Division §319 Training Program and Southern Illinois University Edwardsville:** Program staff will provide valuable training for §319 grants to University of Delaware students. Students are participating in the grant writing club. This is a pilot that will be completed prior to presenting to HBCUs in the southeast.
 - **Laurens County, SC; University of Clemson:** The objective of the Laurens County pilot will be to perform a flood model across multiple watersheds concurrently while aggregating watersheds results to determine downstream flood vulnerabilities. The outcomes of this project will be used to help county planning decision makers understand their risk exposure, determine recovery time objectives and prioritize vulnerabilities within the community so that available resources can be appropriately targeted.
- **EPA's recently established HBCU Council is including CUPP among its list of recommendations to the Administrator** to “strengthen recruitment of students and provide broader support to help fortify HBCUs into the future.”
- **NGOs** can be a useful partner in these projects and may present creative options for match. For example, some have hired local community members to both meet match and provide community engagement from subject matter expert.
 - **The Nature Conservancy** is compensating leaders from community-based organizations (CBOs) for participating in projects dedicated to improving and expanding equitable and sustainable funding for climate adaptation and mitigation in Massachusetts. Essentially, the CBO partners are considered the expert consultants and are the sources for key information that will help align TNC goals and community goals for effective projects in their watersheds.
 - However, this is not currently being using as match – the funding for CBO and EJ leader compensation was awarded directly through a grant from the Barr Foundation in MA.
 - A TNC representative presented the idea of using match incentives (like a reduced match requirement) for projects that provide direct support and compensation to CBOs for work supporting grant purpose and goals. There are many state and federal grant programs that could support their work, but municipalities don't have the capacity to apply or manage the grant. Allowing municipalities to subaward §319 funds to CBOs in exchange for reduced match requirements could be a solution.

- **In-kind services are important**, however, some listening session participants said tracking can be burdensome and present a barrier.
 - One listening session participant shared their method for tracking in-kind services: <https://docs.google.com/spreadsheets/d/1J7hYJAE79y0xhpftSaxzkU14QN5gJol5aHTBlj1rqls/edit#gid=0>
 - Partnering with municipalities and utility companies may add additional qualifying in-kind services
 - **New Hampshire** NPS Program oversaw the purchase and demolition of a house that was used as match on a stream daylighting project where the stream crossing only served that single house lot. The road was dead-ended and the house lot became valuable floodplain. This qualified for nearly \$200K in non-federal match because the community bought it under their Capital Improvement Project budget.
 - Materials / Equipment / Labor
 - Partnering with conservation districts for installation and implementation
 - Sharing heavy equipment (farm, lake, etc.) may allow landowners without disposable income to contribute to the installation of BMPs on their land.
- **Reduced Match waiver approaches:**
 - [Ability to Pay Index worksheet](#) from the University of Tennessee

6.1.2 Input from the EPA Workgroup on match:

- State parks may also have the potential to be considered for match:
 - Missouri has a sales tax that goes half to state parks and half to soil and water conservation districts, but the way their statute is structured, only certain activities can be performed. There may be reluctance to structure programs like this because of a perception of the difficulty of getting involved in a Federal program

6.2 Using the Clean Water State Revolving Fund (CWSRF) program as non-federal match:

States can use recycled funds and administrative fee payments as the 40 percent state match required for federal §319 (h) grants. The recycled funds and fee payments must go toward §319 -eligible projects; however, these projects do not need to be supported by §319 funds themselves. In other words, the §319 statute and EPA's §319 grant guidelines do not require subrecipients of §319 grants to provide any match, so long as the state itself provides it in some fashion.

This is likely to be a source of great relief for states struggling to reach DACs with §319 grant funds, and for the DACs themselves. Although the opportunity to use CWSRF as match for a state's entire §319 grant is widely available to all states and Puerto Rico, only a handful of states have used CWSRF for this purpose to date. For instance, in FY21, 23 states reported using at least \$1 million of CWSRF for §319 -eligible projects². As most of the money that state CWSRF programs manage are the state's own money,

² From NIMS "FACTSSTATES" 2021 report. List of states that reported using at least \$1 million of CWSRF for 319-eligible projects in FY21 includes: AK, AZ, AR, DE, FL, HI, IN, IA, ME, MA, MN, MT, NJ, NY, OH, PA, SD, VT, VA, WA, WV and WY.

it is likely that most of those 23 states can count most of those CWSRF NPS project dollars as match for their §319 match. However, the vast majority of these states do not tap into recycled SRF as a source for this match. Thus, this source of state funds is likely underutilized as a source for §319 match by states overall.

- A potential avenue for innovative match options could be addressing the 319-eligible portion of septic-to-sewer projects with SRF recycled funds. That is, although §319 grants cannot be used for extending sewer lines into neighborhoods that rely on septic systems, house laterals to sewer lines that run along streets can be eligible for §319 funding. In this scenario, there are many potential funding options that can be coordinated between a state NPS program and SRF program, including utilizing recycled funds and direct funds that generate fees to go back toward match.
- At least one state (Illinois) has used administrative fees paid to the state from recipients of CWSRF loans as match for §319 grants, as documented on page 8 of its [2021 Intended Use Plan](#). For states that collect administrative fees, this may be a good model to follow, as these are state dollars which can be used as match for the federal share of their §319 grants.

States that don't yet routinely use CWSRF for NPS projects should consider doing so. If nothing else, this can be an effective strategy for removing barriers for DACs to receiving §319 grant funds, as those communities would not need to provide any match to receive the benefits of §319 grants.

There may be an additional opportunity to increase access to CWSRF funds if an affordability or accessibility criteria is included.

- Furthermore, utilizing the flexibility afforded through principal forgiveness could be leveraged more widely to meet §319 match requirements and support implementation.
- **Georgia Environmental Finance Authority (GEFA)** offers principal loan forgiveness based on an "[Affordability Criteria](#)". In an ideal situation, the Georgia Environmental Protection Division would like to be able to offer "match forgiveness" to the same communities if CWSRF funds could help us cover that match to the overall §319 grant. The barrier is at the state level because GEFA would need to commit to having a dedicated pot of "recycled funds" that can be counted as match and offered at low cost/no cost to §319 grantees, which hasn't happened yet.

7. Program Coordination and Partnership building

To help EPA understand the ease with which grantees and sub-grantees interact with the §319 (h) grant program, the workgroup discussed how various programs interact to support and build partnerships.

7.1: Federal

Federal water programs often share goals of improving water quality. However, the complexities of multiple programs and grants can be confusing and overwhelming to grantees. Furthermore, reporting and tracking requirements may be duplicative and limited resources may cause the grantee to decide not to participate in one program over another, even if their goals are complementary. The workgroup members spent time discussing which programs work smoothly together, which are challenging to navigate, and ways that the programs could be aligned in the future for ease of participation.

7.1.1: Internal EPA

Beneficial:

- **604(b) funds can be used for planning** and some workgroup members are seeing this as an opportunity to target and support disadvantaged communities. New guidance is in development that also encourages funds be used to increase equity and support climate considerations and actions.
 - Examples of equity in 604(b) workplans: Accompanying new 604(b) guidance release, we will be discussing specifics and examples in a future grantee forum.
 - **Maine** currently uses 604(b) funds to develop watershed-based protection or restoration plans and climate considerations are required for those plans.

Challenging:

- Workgroup members discussed some difficulty between financial points of contact and technical staff. This may be a state specific challenge.

7.1.2: Between Federal agencies

Beneficial:

- **New Hampshire** highlighted a successful partnership between NRCS and EPA that utilized the [New England Regional Laboratory](#) in North Chelmsford, MA to process samples that were jointly collected by NRCS and the state for the NWQI prioritization efforts.
 - [EPA Laboratory Services](#) may be an avenue to support data analysis from communities that do not have monitoring support.
 - [EPA Regional Labs](#) can help support data analysis and processing at the regional level. This could offer an opportunity for DACs to build partnerships to analyze their data.

7.1.3: EPA Tribal Programs

Beneficial:

- **PPG**: helpful streamlining of requirements and reporting for multiple grants. Tribal workgroup members see it as a good balance of reporting requirements and flexibility in use of funds.
- Tribal workgroup members have found that the **§319 and 106** programs work well together. They have been able to develop complementary workplans with similar goals.

Challenging:

- **QAPP** requirements can present a barrier because they are necessary to do even small exploratory or assessment actions. For a community, this rigidity can present a high barrier to entry.
- **Brownfields program**: grantees reported a high level of effort to participate, and many Tribes do not have the time to complete the reporting requirements.
 - **See Tribal Workgroup Report** for additional details on this topic.
 - Suggestion to EPA to consider streamlining Brownfields reporting.

8. Short Term Suggestions:

Blue text indicates EPA workgroup annotations and responses to Partnerships and Funding workgroup suggestions and topics.

- **EPA HQ/grantee pilot topics:** The following are topics that were discussed as presenting major barriers to grantees for reaching and supporting DACs. These have been compiled as suggestions to provide direct or technical support for DACs while allowing insights to be collected on best approaches to address the discussed challenges.
 - Pre-Award Assistance Pilot: This pilot would test approaches at different scales to support community grant application development (communities: coastal, agriculture, urban; multi-scales: HUC8, sub-state, Regional)
 - **Direct support** to states that are interested – for example a state with a well-developed pre-award process could mentor a different state that is interested in pre-application approach
 - **Hybrid** of targeting specific communities for direct support AND inviting other communities to listen in to the process
 - **Task for EPA HQ:** Coordinate with Urban Waters Federal Partnership and National Estuary Programs on community targeting approaches
 - Explore and utilize existing efforts and networks – for example Rural Water Association
 - **National training on the application and post award process.** Options include:
 - Mini grant to an NGO/Consultant to present common pieces of grant application
 - Work with Office of Grants and Debarment to develop a subgrantee training; and/or discuss options for their support this effort
 - This effort could include sections for both pre-award and post-award assistance for easing tracking and reporting burdens for grant requirements and in-kind services.
 - Offer support on a more local scale – potentially through mini-grant to NGO/University to work closely with communities in application development
 - Review these options and see if another approach makes sense; get feedback from Environmental Finance Center on options for supporting local communities
 - **EPA HQ Task:** collect FAQs from “Applying and Administering 319”; continue to update
- **Share match resources:**
 - Share local examples of in-kind tracking and reporting resources
 - **EPA HQ Task:** Find examples of effective approaches to meeting and documenting match in other Federal programs
 - National Estuary Programs was given as an example of a program that tracks how projects met their match requirements; this could help to highlight effective approaches to meeting and documenting match.
 - Develop a **factsheet on FAQ** and relevant rules (distribute to pilots, collect feedback)
 - Include as a forum topic for peer-to-peer sharing (see below)

- **Provide clarification and/or guidance on eligible entities** according to federal rules. Providing additional guidance to grantees on eligibility may allow additional funding opportunities to DACs.
 - **EPA HQ** will coordinate with Office of General Council to offer written clarification on:
 - Which entities are eligible to be sub-grantees to receive Federal funds;
 - Limitations and flexibilities for targeting DACs for outreach and opportunities.
 - **EPA will** share findings with grantees via September follow up memo.
- To support targeted outreach and action, EPA could coordinate an approach that would emphasize the inter-related nature of the 106, 604(b), and §319 program.
 - 106 program/ATTAINS: Share priority watersheds for review on sufficiency of assessments and number of impairments; interested high impairments or low assessment rates
 - 604(b): using data from 106 program and NPS, identify opportunities to direct planning funds to priority watersheds or develop steps to support planning efforts in priority watersheds
- **Provide an ongoing forum** for topic-driven small group discussions with mix of grantee types from different geographic areas to continue dialogue and further program to support DAC. Co-chaired with rotating state and Tribal grantees.
- Support efforts in R4 and work with Office of Environmental Justice to extend NPS Program participation in CUPP; seek out other opportunities to partner with HBCUs
 - Regional suggestion to partner with EPA Special Emphasis Programs and HR Offices

9. Long Term Suggestions

Outline and communicate approaches that states could use as match waiver for DACs. This could include factsheets on inter-program support (ex. SRF recycled funds) and information on approaches for states to facilitate match reduction or waivers for qualifying DACs.

- Match waivers would happen at the state level.
 - **Defining DACs that would be eligible for this waiver:** EPA needs to offer a threshold or prioritization of watersheds for grantees to target. If a state has a prioritization, this may also be proposed.
 - **Incentivize overmatch use in DACs:** A state can choose to count overmatch across their entire grant. This is an opportunity to waive match in DACs.
 - **Regions:** Support states with more detailed evaluation of currently tracked match and potential match options to put into use for DACs.
 - **EPA will** outline expectations for waived match to benefit DACs (ex. X% of §319 grant project [\$] that have match waived). EPA can consider match dollars attributed to these projects as “project dollars”.
- EPA Workgroup suggests providing assistance to state grantees to restructure their SRF programs in a way that would support access to recycled funds as §319 match
 - Kansas and Iowa have been working on this and could be good leads to show how they have worked to leverage options.

- **EPA HQ Task:**
 - Hosting preliminary conversations with CWSRF and DWSRF
 - Add a simple tracking mechanism in GRTS to capture when recycled SRF are used as match
- **Regions:**
 - Identify states that are interested in acquiring access to recycled funds for DACs to use as match.
 - Initiate conversations with regional SRF contacts (EPA HQ will support conversations and help to address obstacles).
- EPA HQ to get feedback from the Environmental Finance center on proposed match options.

Evaluate existing grant guidelines and explore potential flexibilities to meet both community priorities and water quality goals. For example, allowing community gardens to qualify as a BMP similarly to a rain garden would help to improve food sovereignty.

Develop a peer-to-peer forum for sharing and teaching about grants, BMPs, and research. For example, a searchable database where grantees could learn about how others have approached problems they are encountering.

- Periodic discussions on an on-going basis; most likely led by HQ staff but encouraging Regional and grantee co-leads (appropriate rotation periods; ex. 6 months-1 year).
- A workshop for grantees that is geared towards enhancing NPS-equity goals, working through barriers, and communicating their successes