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Section I	1	Section I.A. WaterSMART Cooperative Watershed Management Program Grants	Will & Carlson, Inc.	At the beginning of the purpose statement you have left out the first priority which is water conservation.	We have added water conservation to the purpose statement.
	1			You use the phrase "have otherwise satisfied the requirements of Phase 1 – Who makes that determination? Where will that information be posted? The same point as raised earlier – will projects that have demonstrated significant progress be posted for review not only for those in the watershed, but those in the state, region and throughout the West to appreciate the effort and measures that are being considered? Again, it would seem like an easy way to improve the quality of later proposals while abiding by the Administration's Transparency and Sustainability initiatives.	Within nine months from the initial date of award, Reclamation will determine whether a recipient has made sufficient progress within the first year to justify additional second year funding. The recipient will be informed of the outcome in writing. This determination will be based on whether projected milestones have been met and whether the applicant is in compliance with reporting requirements (See: Section II.B. Project Funding Limitations and Cost-Sharing). Reclamation will notify the public.
	2	Section I.B. Objective of Funding Opportunity Announcement	Little Colorado River Plateau Resource, Conservation & Development Area	This funding opportunity announcement (Funding Opportunity Announcement) will implement Phase I by providing funding to establish or expand a watershed group. The indicated Phases of the Cooperative Watershed Management Program (I, II and III) do not appear to be well defined in the initial portions of the grant application. For a Watershed Group to understand the short AND long-term requirements of the Funding Opportunity Announcement, these might be included and explanations provided earlier in the grant application.	The Funding Opportunity Announcement has been restructured in order better define the requirements under each phase of the Cooperative Watershed Management Program. Phase I of the Cooperative Watershed Management Program will be funded through this Funding Opportunity Announcement and funding to implement Phase II and Phase III of the Cooperative Watershed Management Program will be contingent on the availability of appropriations in FY 2013. Please refer to < http://www.usbr.gov/WaterSMART/Cooperative Watershed Management Program/index.html > for the most up to date funding information
	3	Section I.B. Objective of Funding Opportunity Announcement	Will & Carlson, Inc.	Is there a particular definition you are contemplating using for the word "sustainable"?	The definition of what sustainability means to any given watershed group will vary from sector to sector, group to group, and across geographical boundaries based on the unique water resource challenges the group faces. The watershed group will determine how to optimize the beneficial use of shared water resources by identifying common needs across various sectors within a given watershed and developing a plan to address those needs.
	3	Section I.D. Frequently Asked Questions	Will & Carlson, Inc.	This is very good idea to include a "Frequently Asked Questions" section. When you do so, could you please show the date when it was last updated?	A "last updated" date and time stamp will be included on the Frequently Asked Questions page of the Cooperative Watershed Management Program website.
Section II	5	Section II.B. Project Funding Limitations and Cost-Sharing	Will & Carlson, Inc.	And at what point in the Reclamation internal budgeting process will that particular funding need be made known?	Additional Phase I funding, for projects that are selected for funding in FY 2012, will be included in the FY 2013 Presidents Budget Request and made available contingent on final appropriations. Funding that is required to complete grants that were awarded in FY 2012 will be prioritized, prior to allocating funding to new projects in FY 2013. The amount available for protecting second year funding for FY12 will be announce once Congress approves the 2012 budget.
	5	Section II.C. Reclamation Responsibilities	Will & Carlson, Inc.	Will these project awards be published? And will the actual proposal/plan that won the award be published? This would seem to be a good consistent policy given the Administration's emphasis on transparency. There would be additional benefits of letting others in the particular state and region know what is taking place so they could learn from the experience in real time rather than when it is completed. It might also spur a more robust approach to providing other non-Federal funding in an area of particular need.	Reclamation publishes a description of projects selected for funding under the WaterSMART Program at the time of award on the U.S. Bureau of Reclamation's WaterSMART webpage: < http://www.usbr.gov/WaterSMART/index.cfm > Successful proposals will be made available on the Cooperative Watershed Management Program website.
	6	Section II.D. Award Date	Will & Carlson, Inc.	Will this award date change in the future? With the fiscal year beginning at the beginning of October, and the water season often coming to a close soon after, Winter is often the time for meetings and conferences where people could gather and carry forth with the work, the planning and ultimately, the construction that may be necessary as partly envisioned by this Cooperative Management effort.	Grants for Phase I Program activities under this funding opportunity will be awarded in September 2012. This will allow grant recipients to begin planning efforts and work in October 2012. In the future, funding will be made earlier in the fiscal year in order to allow grant recipients to begin work sooner.
Section III	7	Section III. Applicant Eligibility	Will & Carlson, Inc.	Inclusion of county soil conservation districts is an interesting example that maybe useful for applicants. What about including interstate organizations at this point for purposes of eligibility?	Interstate agencies have been added to the list of eligible applicants under this Funding Opportunity Announcement.
	7			"Capability of promoting the sustainable use of water resources" How is this defined?	In accordance with the Act, an applicant must significantly affect or be affected by the quality or quantity of water within the given watershed in order to be capable of promoting the sustainable use of water resources. For this reason, the watershed group will determine how to "sustainably" address these challenges by identifying common needs across various sectors.

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	7	Section III. Applicant Eligibility	Little Colorado River Plateau Resource, Conservation & Development Area	The inclusion of Irrigation Districts, Special Districts and Soil and Water Conservation Districts is problematic. These groups are almost always heavily oriented towards agricultural uses which, by definition, tend to exclude the majority of the other non-agricultural stakeholders. In other words, there tends to be exclusion rather than inclusion.	As described by the Cooperative Watershed Management Act (Subtitle A of Title IX of the Omnibus Public Land Management Act of 2009, P.L. 111-111), irrigation Districts, special districts and soil and water conservation districts are eligible to apply for funding under this Funding Opportunity Announcement, along with a range of other, entities including non-profit organizations and non-agricultural stakeholders. The FOA has a criterion that prioritizes applicants that include a diverse array of stakeholders in the scope of their project.
	7	Section III. Applicant Eligibility	Little Colorado River Plateau Resource, Conservation & Development Area	A question arises in areas where there are substantial public lands (BLM, US Park Service, US Forest Service, State Land Departments). What are the eligibility requirements (or exclusions) for Federal agencies (by definition, regulatory) to participate as stakeholders/members of the Watershed group?	Federal agencies are not eligible to apply for funding under this funding opportunity; however, they are encouraged to participate as participants within a watershed group. Applicant eligibility is more restrictive than what is expected of a watershed group. Watershed groups are encouraged to include a diverse group of stakeholders including, public (federal, state, local) and private sectors. The Cooperative Watershed Management Program is intended to be an inclusive program that incorporates to the maximum extent possible, a diverse set of interests. The program encourages a community-based, cross-sector partnerships in order to strategically address the priority water resource goals (e.g. water quality, habitat) in the area. Prioritization will not be given to one sector over another. In fact, up to 30 points out of the 100 points available under this Funding Opportunity Announcement shall be awarded for the establishment/ expansion of a watershed group that represents maximum diversity of interests under Evaluation Criteria A: Watershed Group Diversity and Geographic Scope.
	7	Section III. Applicant Eligibility	Little Colorado River Plateau Resource, Conservation & Development Area	In Section III.A.2, eligibility requirements indicate that applicants must be a non-regulatory entity. By definition, most Irrigation Districts have priority water-control rights under various aspects of Western Water Law. This section appears to be self-contradictory. By itself, water control/ownership does not imply regulatory authority, but it is almost a de facto situation.	Irrigation districts have water delivery authority. However, they are not regulatory entities.
	7	Section III. Applicant Eligibility	Little Colorado River Plateau Resource, Conservation & Development Area	Section III.A.2 states that the group must be a grassroots organization. This almost always excludes larger governments, such as States and Tribes and other governmental groups which include elected or appointed officials. Not-for-profits appear to be in the best position to mean the intent of the Secure Water Act and WaterSMART funding.	Larger governmental entities such as States and tribal organizations can be apart of a watershed group. The eligibility section for Task B, to expand a watershed group, has been revised in order to make it more clear that an applicant eligible for funding under Task B may include an 1) existing non-profit watershed groups and/or 2) eligible applicants identified in Task A, including, states, Indian tribes, local and special districts, local governmental entities, interstate organizations, and non-profit organizations that: 1) Are participants in an existing watershed, that is legally incorporated within the state in which it operates and otherwise meet the definition of a "watershed group" as described above in Section I.B. Objective of Funding Opportunity Announcement; 2) Provides an Official Resolution that has been adopted by the applicant's watershed group that commits the applicant to the financial and legal obligations associated with receipt of financial assistance under the Cooperative Watershed Management Program.
	7	Section III. Applicant Eligibility	Little Colorado River Plateau Resource, Conservation & Development Area	Some type of documentation of length of time of existence of the group might be considered.	We have included language in the Funding Opportunity Announcement requesting applicants that are seeking to expand an existing watershed group to provide documentation of the length of time of the watershed group has been in existence within the Background Section of the Technical Proposal.
	8	Section III.C. Eligible Activities	Rose Creek Watershed Opportunities Assessment	Eligible Activity #3, do not require the development of new watershed management project concepts when a watershed assessment or other watershed planning document already exists. Additionally, allow the funding to support projects and priorities that have already been identified in pre-existing plans.	Applicants that have completed mandatory activities will not be required to repeat them but they must demonstrate that they have already been completed. Applicants are encouraged to include existing state and regional plans in proposed activities.
	8			Eligible Activity #4, expand more on the opportunity to "improve upon existing restoration plans."	We have revised the funding opportunity announcement to clarify the explanation of what's required for the development of watershed restoration plans.
	8			Eligible Activity #1, allow a responsible non-profit to serve as a fiscal sponsor for a stakeholders group. Due to complex governance issues, not every watershed will have one over-arching non-profit to lead it but that doesn't mean that same goal could be achieved collectively via a stakeholders group that is not a non-profit serving with a responsible fiscal sponsor. Please allow the WaterSMART funding to support other innovative approaches to securing long-term funding (in particular, pertaining to opportunities to seek funding for maintenance) instead of proscribing a set approach. innovative approaches of all types should be encouraged!	To the extent that the applicant who wishes to be the lead on the mandatory activities is a member of an established watershed group as defined in the Cooperative Watershed Management Act, but is not the watershed group itself; the applicant must submit an official resolution from the watershed group indicating that the group supports the proposal from the applicant. Mandatory activities are set forth by the Act, however applicants are encouraged to complete the mandatory activities in innovative and creative ways.

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	10	Section III.D. Ineligible Activities	Will & Carlson, Inc.	It is unclear from reading this section whether office space, equipment, etc. is eligible for funding under this section. And to what extent, and who ends up possessing that "infrastructure" when the effort is concluded.	The budget must correspond with the goals of establishing or expanding a watershed group, as described in the Funding Opportunity Announcement. Costs must be substantiated to support the goals of establishing or expanding an existing watershed group, including completing the mandatory activities described in <i>Section III.C. Eligible Activities</i> . Some supplies under \$5,000 may be eligible and will be considered on a case by case basis but equipment will generally not be eligible. Anything that is purchased through this Funding Opportunity Announcement would remain the property of the grant recipient.
	11	Section III.F.2. In-Kind Contributions	Will & Carlson, Inc.	If I understand this section some group that is existing, or that has funding previously from another Federal program can use that Federal funding for purposes of an in-kind contribution? Or does it mean that if you have previously or in the future receive Federal money that will count against the total of Federal money that is being provided for that particular project emanating from the Cooperative Management program?	Federal funding may not be included as an in-kind contribution. In-kind contributions constitute the value of noncash contributions that benefit a federally assisted project. There is no non Federal cost share requirement for phase I. Non Federal cost share is voluntary. Federal funding for a project in Phase I won't count against the amount of Federal funding that may be received for a Phase II or III application. However, an application cannot receive federal funding from multiple sources for the same work at any Phase.
	11	Section III.G.1. Laws, Permits, and Approvals	Will & Carlson, Inc.	Shouldn't the award of money come after the permits have been acquired? Why have scarce Federal money sitting around unused if permits may be delayed or not issued?	Since Phase I Cooperative Watershed Management Program Grants will generally involve only administrative action, permits are not likely to be required under this Funding Opportunity Announcement. In addition, applicants must state in their proposal whether any permits or approvals are required and explain the plan for obtaining such permits or approvals. Reclamation also performs pre-award reviews and clearances of all selected proposals, including evaluating the likelihood that permits will be able to be secured. If the results of pre-award reviews and clearances are unsatisfactory, consideration of funding for the project may be withdrawn. If the pre-award review and clearances are satisfactory, an award of funding will be made once the agreement is finalized.
	13	Section IV.B. Applicant Submission Date and Time	Will & Carlson, Inc.	I would suggest changing the "may" to "will" in both lines. As stated earlier, other applicants or potential applicants need to learn and understand the qualities that make for a successful proposal, and ultimately, a project. Transparency is the word of the day.	We have changed the language in the Funding Opportunity Announcement to indicate that successful proposals will be made available on the Cooperative Watershed Management Program website.
	14	IV.D. Instructions for Submission of Project Application	Will & Carlson, Inc.	These are useful instructions for the application submission. But why not ask for a hard copy and an email copy so the emailed copy can more easily be posted? The bullet on page 15 would need to be changed. It raises another issue that I don't recall being found in the document. What explanation is provided to the "losers" in this process?	We do not require an electronic copy under this Funding Opportunity Announcement in an effort to make sure that smaller entities will be able to apply. This is a practice we adopted as a result of feedback from applicants under other WaterSMART Programs in previous funding years. Nevertheless, applicants that submit a hard copy are encouraged to include a digital version of the technical proposal on a CD in Microsoft Word format. All applicants will be notified, via email, of whether or not their project was selected for funding (Section VI). All unsuccessful applicants are also offered the opportunity to schedule a debriefing in order to discuss the ranking of their application relative to the evaluation factors in the funding opportunity.
	20	Section IV.D.6. Definition of a Watershed Group	Little Colorado River Plateau Resource, Conservation & Development Area	Again, in Section IV.D.6, the definition of a "watershed" may not be sufficiently specific and may cause confusion.	In accordance with the Cooperative Watershed Management Act, a watershed group is a grassroots non-regulatory entity that address water availability and quality issues within the relevant watershed. More details about the definition of a watershed group have been provided in the FOA.
	20	SF- 424	Will & Carlson, Inc.	How does "legally authorized" work if you are trying to establish an organization and are seeking funding to do so? You would seemingly be narrowing the "market place" to just established organizations that are going to use this program, despite your comment to have an evenly divided funding approach to the effort.	Legally authorized entities include (1) existing watershed groups and (2) eligible applicants, that are representatives of the watershed group, including a state, Indian tribe, local and special districts (e.g., irrigation and water districts, county soil conservation districts, etc.), local governmental entity, interstate organization, and/or non-profit organization that is located in the western United States or United States Territories as identified in the Reclamation Act of June 17, 1902.
	21	Section IV.D.6. Technical Proposal and Evaluation Criteria: Approach	Will & Carlson, Inc.	There is a need for other criteria, principles and procedures so consistency can take place in terms of measuring proposals. If you will, the development of a model that can be used by interested parties.	As the Program develops additional criteria, principles and procedures may develop but, at this time the Phase I Funding Opportunity Announcement, for the establishment and expansion of a watershed group, we have modeled in accordance with the Cooperative Watershed Management Act. The Cooperative Watershed Management Program is in its first year of funding.

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	22	Section IV.D.6. Letters of Support	Will & Carlson, Inc.	Shouldn't one of the letters of support come from the Governor or his designee for such an effort? Other programs require or have required this as a protocol. And it would seem like the other letters of support should come from within the watershed and at the maximum, from within the state.	In some cases this may include a letter of support from the governor. However, this is not a requirement under the Cooperative Watershed Management Program. Many of these groups will be in the beginning stages of planning and expansion of their watershed group, it is anticipated that most letters of support will come from stakeholders within the given watershed. Letters of support are strongly encouraged in an effort to demonstrate the diversity and geographic scope of the proposed or existing watershed group. Since each watershed group will have its own unique composition of stakeholders and objectives, letters of project support are expected to be representative of the particular groups unique goals.
	23	Evaluation Criteria A, Subcriterion 2: Geographic Scope	Little Colorado River Plateau Resource, Conservation & Development Area	Under Evaluation, Criteria A, Sub criterion 2, the HUC definition of a watershed is used. The real or perceived inconsistency in the draft Funding Opportunity Announcement may cause confusion. What size watershed is an important part of the definition: 4, 6 or 8 digit HUC?	In accordance with the Cooperative Watershed Management Act, watershed groups that incorporate the interests and needs of stakeholders within a sub-basin sized watershed, with an 8-digit hydrological unit code, as defined by the U.S Geological Survey, will receive priority under this Funding Opportunity Announcement. For more information on the boundaries of an 8-digit hydrological unit code please see: < http://water.usgs.gov/GIS/huc.html >.
		Evaluation Criteria B: Addressing Critical Watershed Needs, Subcriterion 1: Critical Watershed Needs or Issues	U.S. EPA- Region 9	Suggested Revisions: <u>Evaluation Criteria B: Addressing Critical Watershed Needs, Subcriterion No. 1 – Critical Watershed Needs or Issues</u> Please describe the critical issues or needs occurring within the watershed including, for example, addressing potential water shortages, water quality issues, endangered species issues, conflicts over water, and other related issues faced by affected stakeholders. Water quality issues may include addressing high priority goals identified in Total Maximum Daily Loads (TMDLs), or targeting high priority activities in your state's "Measure W" watersheds. Endangered species issues may focus on activities prioritized by resource agencies such as NOAA or FWS, and appropriate state natural resource agencies.	Examples of other government efforts (i.e., high priority goals identified in Total Maximum Daily Loads (TMDLs), or targeting high priority activities in your state's "Measure W" watersheds) that may be related to the establishment or expansion of a watershed group have been added to the Funding Opportunity Announcement, in order to coordinate similar efforts being employed by other Federal agencies.
	24	Evaluation Criteria B: Addressing Critical Watershed Needs, Subcriterion 1: Critical Watershed Needs or Issues	Will & Carlson, Inc.	What about a document that addresses the critical issues and needs of each stakeholder group that is participating? It would then seemingly show the strategies of "collaboration" for achieving that effort. But there are other larger needs such as population, job creation and other economic planning issues that need to be accounted for in such a process. Remember, this is the Cooperative Watershed Management Program, not the Cooperative Watershed Restoration Program.	The creation of a watershed restoration plan is a mandatory Phase I activity. Because many applicants will be in the early stages of forming a watershed group, we do not expect them to have an existing document spelling out critical watershed needs at this point. As a watershed group forms and expands, the critical needs of the participating stakeholders will evolve. We ask all applicants to describe the various types of water issues that are being faced in the affected watershed (e.g., shortfalls in water supply, endangered species concerns, environmental issues, or other issues the planned watershed group would like to address). Additional language has been added to the Background section of the Technical Proposal, IV.D.6. Technical Proposal and Evaluation Criteria, asking applicants to provide information about the critical needs the group would like to address, if this information is available. The CWMP addresses both water quality and quantity by addressing water management and ecological issues.
		Evaluation Criteria C: Implementation and Results, Subcriterion 1: Project Planning	U.S. EPA- Region 9	Suggested Revisions: <u>Evaluation Criteria C: Implementation and Results, Subcriterion No. 1-- Project Planning</u> Does the project have a nexus to a State or regional watershed plan? Please describe how the existing or proposed watershed group, or the proposed activities of the watershed group, conform to or meet the goals of any applicable State or regional water plans. Such plans could include a water conservation plan, System Optimization Review (SOR), or other relevant planning efforts. For example, plans that meet criteria identified in California's Nonpoint Source (319h) grants program, and that meet EPA's criteria for Watershed-Based Plans, can address this subcriterion. Relevant water plans, or excerpts from them, may be attached to your proposal, if appropriate.	We have included language in <i>Evaluation Criteria C: Implementation and Results, Subcriterion 1: Project Planning</i> providing the EPA's Nonpoint Source Management Program and Watershed-Based Plans as examples of the types of activities a watershed group might implement in order to meet the goals of any applicable State or regional water plan.
	24	Evaluation Criteria C: Implementation and Results, Subcriterion 2: Contributions that Address Watershed Needs or Issues	Will & Carlson, Inc.	Why not show the costs of each stage as well?	We have included language in Evaluation Criteria C: Implementation and Results, Subcriterion 2: Contributions that Address Watershed Needs or Issues, requesting that the applicant provide the cost of each stage of the proposed work.

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	25	Evaluation Criteria D: Watershed Group/Landscape Conservation Cooperatives Nexus	Will & Carlson, Inc.	<p>This criteria requirement appears out of thin air. Obviously this effort is a new Administration/Interior initiative. There is no explanation other than two website referrals regarding the explanation, goals and accomplishments of this program to date. And why this is beneficial to the effort. This is a Fish and Wildlife Service generated program and without review there is no understanding on how this relates to the Reclamation program and the projects in the program.</p> <p>In the hearings and meetings that I have attended in Washington, D.C. there has been very little positive discussion of this program the past three years. Inclusion in the Evaluation of a proposal (10 points) would give the appearance of a "thumb-on-the-scale" benefit for the underlying bias that has run throughout this document – water quality over water quantity, and restoration over enhancement of water resources.</p> <p>There is a need to go beyond just 2 website addresses and explain the importance of having these Landscape Conservation Cooperatives included in this document and program. But why is it there? And what other Initiatives were considered as part of this effort?</p>	<p>Additional language has been added to the Funding Opportunity Announcement, Section I—Funding Opportunity Description, describing how participation in an LCC will further the efforts of a watershed group. The Bureau of Reclamation is actively engaged in the LCCs and is co-leading both the Desert and Southern Rockies LCCs.</p> <p>LCCs are public-private partnerships composed of states, tribes, federal agencies, non-governmental organizations, universities and others. Through the LCCs, conservation programs and partners working in the same geographic areas can come together to agree on a shared vision for the sustainability of natural and cultural resources. The role of each individual LCC is: to leverage funding, staff and resources; to develop common goals; to develop tools and strategies to inform landscape-scale planning and management decisions; to link science to management; and to facilitate information exchange among partners</p>
	25			<p>I find myself dismayed by this effort by introducing a whole other Initiative – the Landscape Conservative Cooperatives into this process. This "catch-us-if-you-can mindset " approach where such major policy changes that go beyond the substance of legislation, or in some cases would need legislation, are buried in documents for those who know to be interested enough have to dig to find.</p> <p>Reclamation has walked away from that unspoken vow of trust by such practices.</p>	<p>Participation in an Landscape Conservation Cooperative is not a requirement in order to receive funding under the Cooperative Watershed Management Program. This criteria was included within the funding opportunity in an effort to encourage coordination of similar federal initiatives that strategically address priority water resource goals.</p>
	25	Evaluation Criteria D: Watershed Group/Landscape Conservation Cooperatives Nexus	Oregon Water Resources Congress	<p>We are also confused and concerned about the inclusion of participation in a Landscape Conservation Cooperative as part of the Cooperative Watershed Management Program funding criteria. This was not part of the Cooperative Watershed Management Program language in Public Law 111-11 and is not mentioned elsewhere. Requiring participation in a new program that many entities, including our members, may be unfamiliar with, will likely dissuade potential applicants. We would encourage that this addition to the criteria be removed and the language refocused on the Cooperative Watershed Management Program in future documents.</p>	<p>Participation in an Landscape Conservation Cooperative is not a requirement in order to receive funding under the Cooperative Watershed Management Program. This criteria was included within the funding opportunity in an effort to encourage coordination of similar federal initiatives that strategically address priority water resource goals.</p>
	27	Section IV.D.7. Environmental and Regulatory Compliance	Will & Carlson, Inc.	<p>Why wouldn't Reclamation be looking at the Clean Water Act, the Coastal Zone Management Act and the Safe Drinking Water Act if the focus of this effort is on water quality? Some of the Public Lands statutes would seemingly be included on this list as well. I believe there are other questions that should be included on the list as a result of need to include those Acts in the review and would encourage Reclamation to look at additional questions as a result.</p>	<p>Compliance with the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), and the National Historic Preservation Act (NHPA) are requirements in order to issue a financial assistance agreement. However, before approving expenditures for the implementation of a grant under the Cooperative Watershed Management Program, Reclamation is required to comply with all applicable environmental laws, including the Clean Water Act, the Coastal Zone Management Act and the Safe Drinking Water Act. (Section IV.D.7)</p> <p>In addition, Phase I Cooperative Watershed Management Program Grants will generally involve only administrative actions, such as drafting a mission statement and watershed restoration plan, in most cases, little or no environmental compliance will be associated with the grants.</p>
	28	Section IV.D.9. Funding Plan	Will & Carlson, Inc.	<p>It is unclear why Reclamation would be providing funding in a watershed effort when other Federal agency funding is being used to address the problem. However, the overall thrust of requiring a funding plan and the Budget proposal on pages 29-33 makes clear the need for detail so more sound decisions can be made regarding the investment of Federal dollars. It does raise the question of whether in-kind contributions should be capped so those in the given watershed have a greater stake in the effort by using market signals to bring about collaboration. On page 30 I do have additional concerns regarding the brief discussion under travel. In this information age why is there a need to pay for any travel outside of the watershed? Is this the subtle way of making people know they will have to pay for the appearance for anybody from the Federal government as has happened in other programs?</p>	<p>There is no non-Federal cost-share. If an entity voluntarily provides in-kind or cash non-Federal cost share, they will need to provide a funding plan and budget proposal to inform the program of the applicants budgetary activities.</p> <p>The Cooperative Watershed Management Program will not pay for Federal travel.</p>
	28	Section IV.D.9. Funding Plan	Little Colorado River Plateau Resource, Conservation & Development Area	<p>Section IV.D.9 requires a large amount of onerous documentation for those that choose to show cost-share (which is almost always desirable) and/or in-kind costs. In the interests of reducing paperwork, simplifying the application and encouraging cost-share, these requirements might be reconsidered and simplified.</p>	<p>We have simplified the requirements for providing a voluntary non-Federal cost share.</p>

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	31	Section IV.D.10. Budget Proposal: Contractual	Will & Carlson, Inc.	Is there not a need for publicly knowing who these consultants, contractors, sub-recipients are and what their unique qualifications for the work happen to be under the proposal? I would think Reclamation would want to develop some qualifications list for such work.	In many cases, the actual consultants, contractors, and sub-recipients will not be known until after funding is received and the watershed group is established. Diversity of the watershed group is encouraged. An in <i>Evaluation Criteria A: Watershed Group Diversity and Geographic Scope, Subcriterion No. A1-- Watershed Group Diversity</i> , applicants are asked to describe the affected stakeholders that are or will be involved in the watershed group's activities.
	31			After reading this section I found my self wondering why doesn't Reclamation handle all of this work for the project? If these are not major undertakings then possibly Reclamation could use the WestFast process to address the need for environmental compliance.	Language was added to the funding opportunity indicating that Reclamation can provide technical assistance at the request of the grant recipient.
	32			Is there a reason why prevailing rates in the area can't be used?	Prevailing rates do not apply under this Funding Opportunity Announcement since, there are not costs of construction.
Section VI	37	Section VI.B. Award Document	Will & Carlson, Inc.	The example you use "expected water savings" seems to head further down the path toward restoration rather than management. Would this mean that a proposal that requires the development of more water as a result of a collaborative process would not receive a preference? Does it mean the program is about quality or quantity when it comes to the issue of water?	The purpose of the Cooperative Watershed Management Program is focused on the need to improve water quality and ecological resilience and to reduce conflicts over water through collaborative conservation efforts in the management of local watersheds. The goals of an individual watershed group will be unique to concerns of a particular watershed. Proposals that encourage water conservation are encouraged and will not be at a disadvantage under this Funding Opportunity Announcement.
Section VI	37	Section VI.C.2. Program Performance Reports	Will & Carlson, Inc.	In the second bullet I would like you to place the same requirement/notice on all applications, period. Even if not successfully funded, people in the watershed and the state have the right to know about such proposals. This may also result in other creative ways to have the efforts addressed – whether through government or a non-Federal manner.	All final reports that are submitted under the WaterSMART Program are public documents and may be made available upon request. Unsuccessful documents are not public documents and will not be posted.