

- 1. Question:** Can a federal agency apply for these funds?  
**Answer:** Yes, a federal agency is eligible to apply.
- 2. Question:** One District-owned property is an open lot on which old cars are stored for an indefinite period of time. This lot is a source of stormwater pollution from the dripping automotive chemicals, and oil and grease that are washed off the lot during a rainstorm, which run to a separated storm sewer. Would a project to raise a roof over the lot to prevent the stormwater from picking-up the pollutants be eligible for funding?  
**Answer:** No, the CWC program cannot fund the construction of a roof. If the applicant proposes installing a greenroof, then the greenroof portion of the construction is fundable. Building a system for containment and/or treatment of the storm water running off the roof before draining to the sanitary sewer would be eligible, but, again, the cost for construction of the actual roof is not be eligible for funding.
- 3. Question:** If a project is not ready to start in time for the FY17 grant application to EPA, does it stay on the ranked list for a future cycle of funding?  
**Answer:** Yes. If a project is not ready to start in time for the FY17 grant application to EPA, it stays on the ranked list for a future funding cycle
- 4. Question:** May an applicant resubmit an application for the same project in a subsequent solicitation if there is reason to believe the application/project will be presented significantly better?  
**Answer:** During a PPL public Comment period, a partner with an application on the PPL can ask DOEE to remove it from the list. In response to a new project solicitation, a partner can submit a new application. In this way, an existing application would effectively be replaced.
- 5. Question:** Why is the funding a grant and not a loan?  
**Answer:** The District of Columbia is exempt from establishing a State Revolving Fund program because there is only one water utility to support. As a result, EPA grants the funds for this work directly to the District and to DC Water.
- 6. Question:** Regarding the reporting on contractors and sub-grantees, what if we don't know who these entities will be?  
**Answer:** Contractors or sub-grantees will usually be solicited for a project only after funds have been awarded, so reporting on contractors and sub-grantees would be submitted when it becomes available.
- 7. Question:** Do any of the reporting requirements apply during the application process?  
**Answer:** No. Reporting is required after a project has been funded.
- 8. Question:** If there are competing requirements for contractors among US EPA, the District, DOEE, and another government agency or nongovernmental organization, whose requirements take precedence?

**Answer:** The federal requirements will always take precedence, unless the specific competing requirement is stricter. In that case the federal requirement would be released and the competing requirement would be upheld.

9. **Question:** Do you think an applicant needs to get a score of 60 or 70 to be competitive?

**Answer:** No, highest ranked project on the most recently-approved project priority list has a score of 43.7.

10. **Question:** What is GPR?

**Answer:** GPR stands for Green Project Reserve. A GPR project addresses green infrastructure, water or energy efficiency improvements, or other environmentally innovative activities. For project examples, refer to EPA's [Green Reserve Project Crosswalk](#).

11. **Question:** Is a perfect score on an application impossible to achieve?

**Answer:** Yes. The scoring criteria are structured in such a way that often within an individual criterion, points are offered for different categories of projects, and a project would not fall into multiple categories. In this way, a single project could not accumulate all the points offered – and so a perfect score of 100 is impossible.

12. **Question:** Is there a connection between GPR and amount of points received?

**Answer:** As described in the answer to question 11, points are given for different types of projects. Refer to the scoring criteria to determine exactly how many points are awarded to a project in the GPR category.

13. **Question:** Regarding the rating criteria for Treatment Works Projects under criterion “a” on page 7 of the Project Priority System (Appendix 2), what type of documentation is required for a site to have “Documented Water Quality Degradation.”

**Answer:** Water quality degradation can be observed and/or monitored, and can be documented through laboratory-tested water samples, photographs and/or written and dated monitoring logs that describe the source of pollution, type of pollution, as well as the path of travel from the source to the storm sewer. The degradation does not have to be quantified.

14. **Question:** Should we structure the application with the headings in the RFA and the scoring criteria?

**Answer:** Yes you should structure the application with the headings in the RFA and the scoring criteria.

15. **Question:** Is there a scoring criterion for the match?

**Answer:** Yes. See section 2 of the RFA on page 10 for the scoring criteria.

16. **Question:** Is an application eliminated from consideration for not having a match?

**Answer:** Yes. A 45 percent non-federal funding match is required for each project.

18. **Question:** Some of the application is very technical. Can I work with someone at DOEE?

**Answer:** Yes, it is appropriate to get assistance with technical aspects of the project from a stormwater professional at DOEE; however, all questions about the RFA should be directed to Suzy Wald at [suzanne.wald@dc.gov](mailto:suzanne.wald@dc.gov).

19. **Question:** DC has a lot of construction requirements. Can the SRF funds be used to help meet them?

**Answer:** Depending on the project, stormwater management plan and a sediment and erosion control plan may be required. Fees associated with the permits for this can be paid through SRF funds.

20. **Question:** Can you use SRF funds to pay for work required by a stormwater management plan?

**Answer:** Yes.

21. **Question:** Can you use SRF funds to pay permits/review fees?

**Answer:** Yes.

22. **Question:** Our project is highly conceptual right now. Would it be better to apply for funds to design and engineer or the whole thing?

**Answer:** Funded projects must be assured to go to construction. An application can include a funding request for: design alone with a description of how construction will be funded; construction alone when designs are already completed; or design and construction. Additionally, a project can be funded in phases, so a design phase of a project can be included in the District's application to EPA, and the construction phase can be applied for in a subsequent year.

23. **Question:** Can demolition costs be part of the application?

**Answer:** If the demolition is intrinsic to the construction of the eligible project, then the demolition is eligible for funding. For example, median replacement work completed by the DC Department of Transportation that was funded through EPA included the demolition and removal of concrete medians, which were then replaced with permeable surfaces, landscaping, trees, etc. (storm water control/ water quality benefit)

24. **Question:** Can SRF fund part of a bigger project, for example a green roof on a recreation center?

**Answer:** Yes.

25. **Question:** Regarding overhead costs, is there a specific amount that is allowable?

**Answer:** Overhead and indirect costs can be charged to the federal grant, but the costs claimed must be allowable and reasonable. The District government's overhead and indirect charges are held to a 4 percent cap. Contractors and subcontractors are not held to this cap, but EPA suggests using 4 percent as a benchmark for making the reasonableness determination. If DOEE provides a subgrant, federal regulations in 2 CFR 200 stipulate a 10 percent de minimus rate.

26. **Question:** Does Treatment Works mean point source?

**Answer:** No. Treatment Works collect stormwater and sanitary sewage from all over the city, transport it to the treatment plant, or empty it into a stream valley or other relative low point on the landscape. Nonpoint source pollution can be collected and conveyed through the storm sewer system.

**27. Question:** Is there a percentage allowed for in-kind for the match?

**Answer:** In-kind cannot count toward the required match.

**28. Question:** Is there a backlog of projects from previous years?

**Answer:** Yes. The Project Priority List is a list of projects for which applications were submitted in response to previous requests for applications. Once a project is determined eligible, scored and placed on the PPL, it remains there until 1) it is funded through a subsequent funding cycle, or 2) the applicant reports that the project is no longer feasible, and should be removed.

**29. Question:** What if you are going down the list awarding money and end up with less than what the “final” awardee requested.

**Answer:** If the top five projects are ready to be implemented, but only the first four projects can be fully funded with the funding amount available, DOEE may choose to fund just the four top projects; however, if a project can be broken into phases and the remaining funds satisfy the phase, then funding said phase of that project may be implemented

**30. Question:** When and how frequently can a funding recipient invoice?

**Answer:** Invoices/Requests for Reimbursement may be submitted as approved funds are spent. Supporting documentation for all expenditures must be submitted with the invoice. Documentation requirements are detailed in section IV, part 2 of the PCA (Appendix 3).

**31. Question:** Must all projects be implemented on public land?

**Answer:** Treatment Works projects must be implemented on public land, and Nonpoint Source Projects can be implemented on either public or private land. EPA has produced a crosswalk document that can help determine which category a potential project falls into. This is called the [Green Project Reserve Crosswalk](#).

**32. Question:** How do the scoring criteria match up with the priorities in the Anacostia River Watershed Restoration Plan?

**Answer:** The scoring criteria do not align with the Anacostia River Watershed Restoration Plan; however there may be overlap stemming from a common purpose of improving water quality and watershed health.

**33. Question:** What is the timeline for DOEE changing the District Project Priority System and the scoring criteria?

**Answer:** DOEE plans to complete and implement the updated PPRS by the time of the next Request for Applications.

34. **Question:** Would an entire project would be eligible for SRF funding, or just the portion of it that works to improve water quality? If the project is to install stormwater green infrastructure, and it is just a part of a larger construction project, could the costs of other elements of the project be counted as match?

**Answer:** The portion of the project eligible for funding is limited to the portion of a project that works to improve water quality. Likewise, the match funding can only be drawn from the portion of a project that works to improve water quality. An applicant proposes an eligible project, requests that EPA fund 55% of the cost, and shows how the applicant will provide 45% of the cost. That 45% is the match. The portion of a project that is not eligible for funding should be described in the project summary/overview.

35. **Question:** Excessive Inflow or Infiltration – What is considered to be excessive? Project Priority System does not specific amounts.

**Answer:** The regulations of the Federal Construction Grants Program pursuant to section 201 of the Clean Water Act, (see 40 CFR 35.2120), copied below, offers the reference for this question. A summary would be that the facility operator must determine whether or not the receiving sewer system and treatment works have the capacity to transport and treat the flow caused by high groundwater or storm events entering the system. If the flow rate at peak times will cause operational problems for the waste water treatment facility, then there is excessive inflow. Following is the exact text:

CFR § 35.2120 Infiltration/Inflow.

- (a) General. The applicant shall demonstrate to the Regional Administrator's satisfaction that each sewer system discharging into the proposed treatment works project is not or will not be subject to excessive infiltration/inflow. For combined sewers, inflow is not considered excessive in any event.
- (b) Inflow. If the rainfall induced peak inflow rate results or will result in chronic operational problems during storm events, or the rainfall-induced total flow rate exceeds 275 gpcd during storm events, the applicant shall perform a study of the sewer system to determine the quantity of excessive inflow and to propose a rehabilitation program to eliminate the excessive inflow. All cases in which facilities are planned for the specific storage and/or treatment of inflow shall be subject to a cost-effectiveness analysis.
- (c) Infiltration.
  - (1) If the flow rate at the existing treatment facility is 120 gallons per capita per day or less during periods of high groundwater, the applicant shall build the project including sufficient capacity to transport and treat any existing infiltration. However, if the applicant believes any specific portion of its sewer system is subject to excessive infiltration, the applicant may confirm its belief in a cost-effectiveness

analysis and propose a sewer rehabilitation program to eliminate that specific excessive infiltration.

(2) If the flow rate at the existing treatment facility is more than 120 gallons per capita per day during periods of high groundwater, the applicant shall either:

(i) Perform a study of the sewer system to determine the quantity of excessive infiltration and to propose a sewer rehabilitation program to eliminate the excessive infiltration; or

(ii) If the flow rate is not significantly more than 120 gallons per capita per day, request the Regional Administrator to determine that he may proceed without further study, in which case the allowable project cost will be limited to the cost of a project with a capacity of 120 gallons per capita per day under appendix A.G.2.a.

36. **Question:** Operational Reliability – Does this pertain only to DC Water operations, or can it apply to other. But this may mean operational reliability of storm or waste water systems.

**Answer:** This refers to the operational reliability of any component or system that relates to waste water treatment, collection and conveyance. If the system is already constructed and in operation; is publicly owned; and is in need of or will soon be in need of repair, replacement, conversion, etc., then this scoring criteria can apply.

37. **Question:** Category 3 Watersheds – Is category 3 the same as category c, or tier 3? Are the Anacostia, Rock Creek, and Potomac watersheds category 3?

**Answer:** The definition of a category 3 watershed is described in the is not the same as the definition of a category c watershed but it is similar to a tier 3 watershed, which is a pristine or sensitive watershed. The Anacostia, Rock Creek, and the Potomac, as describe in the PPRS document which references the “Unified Watershed Assessment” are category 1 watersheds, “watersheds do not meet clean water or other natural resource goals and need restoration, and are most in need of restoration during the next two years.”

38. **Question:** Daily non-compliance – Would this project help us to comply on a day to day basis? How does EPA define NPDES compliance?

**Answer:** If the facility/site of the polluting discharge is municipal, then the facility has responsibility under either the District’s NPDES permit or the federal Multi-Sector General Permit (MSGP) for industrial activities to prevent pollution from entering District waters, either through the storm sewer system or through direct drainage. A project constructed to prevent this pollution will “contribute to achieving NPDES compliance.”

If the facility has industrial activities occurring on site, it is required to gain coverage under the MSGP or under an individual MS4 permit. Failure to obtain coverage in and of itself is a violation of the Clean Water Act. To determine whether or not a facility or its operations are in a state of noncompliance, self-monitoring is required. For example, if an industrial facility discharges effluent; and laboratory tests find that pollutant levels in

the effluent are above the benchmark for one or more NPDES pollutant; then the facility must obtain coverage under the U.S. EPA Multi-Sector General Permit. If the facility has not done this, then it exists in “noncompliance.” Further, if effluent is discharged daily, and the proposed project would effectively stop the pollution from entering the storm sewer system, then the noncompliance is “resolved.” The proposed project would “resolve daily noncompliance.” Frequency determinations of “occasional” and “frequent” would follow a similar logic.

39. **Question:** What attachments should we include/not include?

**Answer:** A complete application includes the cover sheet and application with all the elements requested in section II of the RFA. A nongovernmental organization must attach all six documents listed as required under section IV of the RFA. Additional documents which support statements made in the application, or which provide details essential to reviewers can and should be included. This can range from letters of support from landowners, to key staff resumes, to design documents, to photos of the proposed site, to cost estimates for purchase of a major system.

40. **Question:** Are ecological remediation and restoration, and landscape architecture eligible expenses under the grant?

**Answer:** All projects or portions of projects that directly provide a water quality benefit are eligible expenses. This will include the design, construction and construction management of an eligible construction project, as well as project administration costs. Please refer to the following EPA web pages for more guidance on project eligibility:

- 1) [CWSRF Project Eligibilities](#)
- 2) [Green Project Reserve Crosswalk Table](#)
- 3) [Green Project Reserve Eligibility Guidance](#)