

New Hampshire Section 319 Nonpoint Source Grant Program Quality Assurance Project Plan

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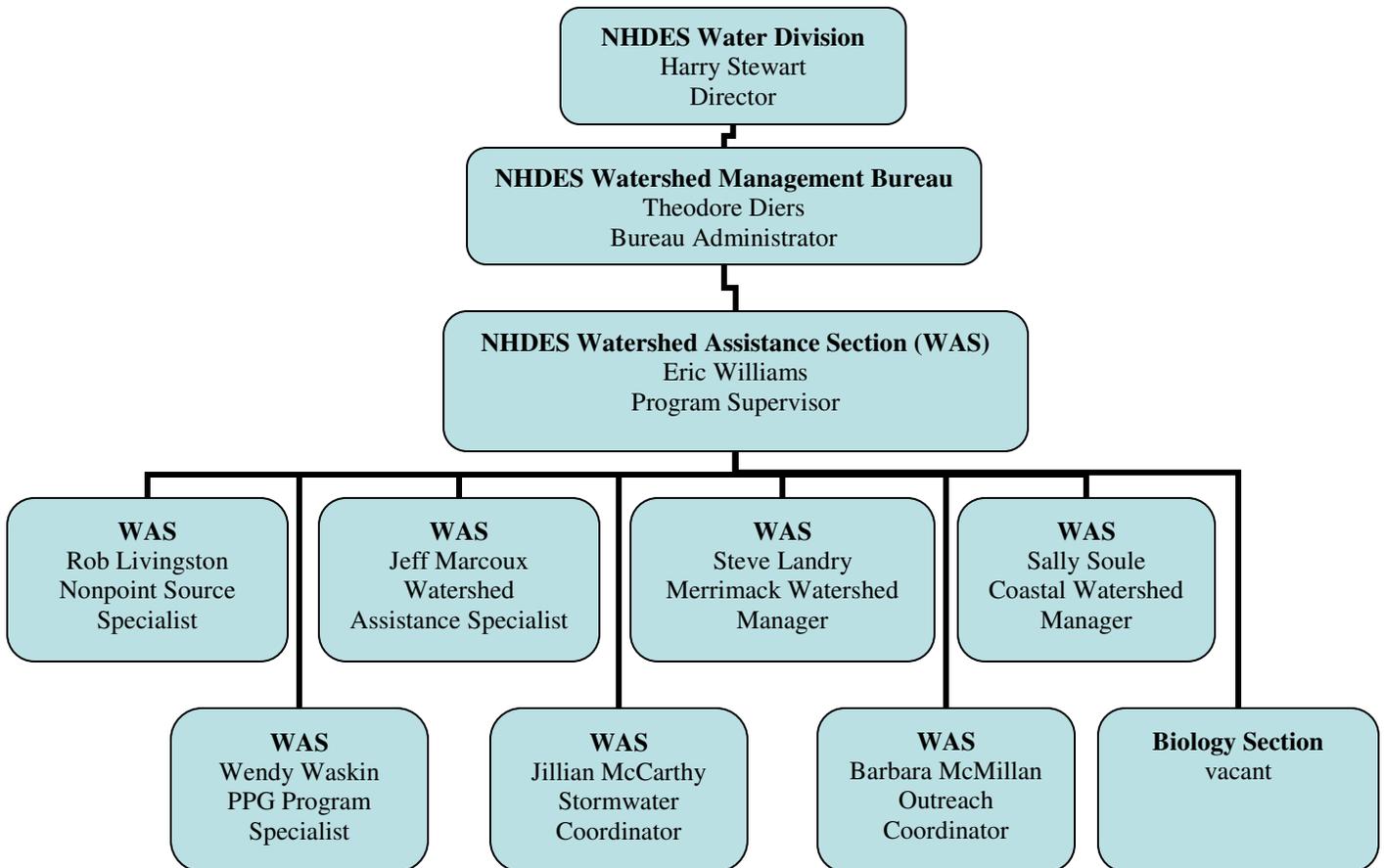
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I. Introduction

The purpose of this document is to describe the process used to manage the Section 319 Watershed Assistance Grants Program in New Hampshire and how quality assurance concerns are addressed in this process. This document serves as an overall quality assurance project plan (QAPP) for most projects funded with Clean Water Act (CWA) Section 319 funds in New Hampshire. Projects not covered by this QAPP are described in Section III, below. This program QAPP is reviewed by NHDES Watershed Assistance Staff on an annual basis. Any modifications to the QAPP or attachments will be incorporated and distributed as needed. Every five years the QAPP will be reviewed, updated, and re-submitted to EPA for re-approval.

II. NHDES Organizational Chart for the 319 Nonpoint Source Grant Program



III. Program Objectives and QAPP Applicability

The overall objective of the New Hampshire Department of Environmental Services (NHDES) Nonpoint Source Program is to prevent, control or abate nonpoint source pollution (NPS) to the waters of the state – surface waters (both freshwater and saltwater) and groundwater. The New Hampshire Nonpoint Source Program is guided by the *New Hampshire Nonpoint Source Management Plan*¹, which was originally approved by US EPA in 1989, was last updated in 1999, and is being updated in 2013. Projects selected for funding are consistent with the goals, objectives, and strategies expressed in the state Nonpoint Source Management Plan.

NHDES administers the Watershed Assistance Grants Program to provide financial assistance (subgrants of Section 319 funds) to help subgrantees (hereafter referred to as grantees) conduct NPS projects. NPS projects implement actions to restore or improve water quality and enhance the designated uses of the state's waters by addressing sources of NPS pollution, hydromodification² of rivers and streams, and habitat losses.

This QAPP is intended to cover all NPS projects receiving funding under the Watershed Assistance Grants Program with the exception of projects that include environmental monitoring not covered by this or other programmatic QAPPs. Projects covered under this program QAPP may be required to complete additional QA documentation, typically site specific project plans (SSPPs), to provide project-specific information not covered in this document. QA documentation templates are provided to the grantee by NHDES and include the following:

- SSPP for Watershed Surveying Projects -Attachment A
- SSPP for Watershed Management Planning Projects -Attachment B
- QA Checklist for BMP Implementation Pollutant Load Reduction Analysis -Attachment C

Further, projects covered under the *Generic Quality Assurance Project Plan for Microbial Source Tracking* (NHDES, 2010), the *Generic Quality Assurance Project Plan for Stream Morphology Data Collection* (Sean Sweeney and Susan Simpson, Provan & Lorber, Inc, 2008) must complete SSPPs as outlined in the respective generic QAPP documents, available from NHDES. All completed SSPPs must be approved by NHDES.

Projects that include environmental monitoring not covered by this or other generic QAPPs will require an individual project QAPP to be developed in accordance with the New Hampshire Quality Management Plan and EPA requirements. A template for individual QAPPs based on the R-5 format and instructions for QAPP development are provided to the grantee by NHDES. These specific QAPPs are submitted to NHDES and US EPA for approval. These approvals must be obtained before project work can begin.

¹ The *New Hampshire Nonpoint Source Management Plan* is located on the NHDES website at: <http://www.des.state.nh.us/organization/commissioner/pip/publications/wd/documents/nhdes-wd-99-7.pdf>

² Hydromodification is the alteration of the natural flow of water through a landscape, and often takes the form of channel modification or channelization.

III. Program Quality Objectives

This QAPP addresses NPS watershed projects that are common to the grant program. The watershed projects are separated into three categories: watershed surveying, watershed management planning, and watershed implementation. The quality objectives for each project category vary and are discussed below.

a. Watershed Surveying Projects

Watershed surveying projects identify NPS problem sites and gather data to quantify the problem. They provide essential information for watershed planning projects and watershed implementation projects to allow for targeted remediation efforts and recommendations for Best Management Practices (BMPs) to control or prevent pollution throughout a watershed. The project-specific surveying methods and procedures for NPS Watershed Surveying Projects are reviewed by the NHDES to assure that quality objectives are accounted for.

b. Watershed Management Planning Projects

Watershed management planning projects develop and promote the use of a locally-supported plan to guide pollution control and prevention activities throughout the watershed, as well as to formally recognize the roles of participating project sponsors and stakeholders. NPS Watershed Management Plans are reviewed by the NHDES to assure that quality objectives are accounted for and that EPA guidelines on watershed based planning are followed.

c. Watershed Implementation Projects

Watershed implementation projects focus implementation efforts throughout a watershed to the extent that water quality will be protected or impaired waters will be restored or measurably improved. Watershed implementation projects are designed so that best management practices (BMPs) are selected, designed, and installed properly and sufficiently to achieve significant reductions of NPS pollution to the receiving waterbody where needed.

Collectively, watershed surveying projects, watershed management planning projects, and watershed implementation projects result in maintaining, protecting, and restoring water quality. Water quality is judged using the NH Surface Water Quality Regulations (Env-Wq 1700), other regulations in the Env-WQ series, or other parameters that indicate water quality (e.g., increases in fish or macroinvertebrate counts).

The quality assurance requirements for NPS watershed projects and the Watershed Assistance Section are addressed through the following documents:

- *NHDES Request for Proposals FY 2013 Watershed Assistance Grants for Nonpoint Source Pollution Control Projects* (or current year, as applicable).
This document includes instructions for Scope of Work content and format.
- *NHDES Grant Agreement Template*.
Grantees are required to administer the project in accordance with the grant agreement. The grant agreement describes the grantee responsibilities in the General Provisions and Exhibit A, specifies the payment amounts and schedule in Exhibit B, and any

special Provisions in Exhibit C. The grant agreement requires approval of the Governor & Executive Council before the project can commence.

- *NHDES Nonpoint Source Grant Administrative Guidelines – New Hampshire Nonpoint Source Grants Program, July 2008, updated March 26, 2013.*
Grant agreements for NH NPS projects require grantees to follow these guidelines, which detail reporting requirements and provide information to help the grantees and NHDES staff administer NPS projects.
- *Pollutants Controlled Report*
This report form provides instructions to grantees for estimating and reporting pollutant load reduction and resource protection accomplishments during the project period. This information is entered by the NHDES Grant Assistant into the EPA database –Grants Reporting and Tracking System (GRTS).
- *Guidance for the Development of Watershed Management Plans in New Hampshire, May 5, 2008, updated March 26, 2013.*
This document provides guidance to an organization, or subcontractor, to develop key components of a watershed management plan being funded under Section 319 Watershed Assistance Grants funds, or any effort that seeks a quantitative framework for watershed management in the state of New Hampshire. This includes conducting an analysis of existing water quality and the associated assimilative capacity of a waterbody, which are used to establish water quality goals for various water quality parameters, as well as to determine actions that are needed to meet the established goals.
- *New Hampshire Stormwater Manual. 2008*
This manual is issued in three volumes:
Volume 1: Stormwater and Antidegradation presents an overview of NH’s stormwater program together with related federal program requirements, describes NH’s Antidegradation provision (Env-Wq 1708) with respect to controlling water quality impacts due to stormwater discharges, and provides an introduction to the non-structural and structural measures for managing stormwater.
Volume 2: Selecting and Designing Stormwater Best Management Practices presents a detailed description of the structural BMPs applicable for use in NH for the prevention, control, and treatment of stormwater.
Volume 3: Construction Phase Erosion and Sediment Controls presents a selection of practices applicable during the construction of projects to prevent adverse impacts to water resources as a result of land-disturbance activities.

IV. Program Design

Most Section 319 funded projects in New Hampshire are selected through a competitive request for proposal (RFP) process. NHDES prepares and releases an RFP to the public in the summer/fall of each year. A component of the RFP is a pre-proposal stage. The pre-proposal consists of an abbreviated proposal format that allows the applicant to submit their project ideas to be evaluated against the eligibility criteria and project requirements prior to investing a large amount of time developing a full proposal.

Projects that meet the eligibility and project requirements are invited to an informational interview to discuss the project with NHDES staff, and, based on the results of the interview, may be invited to submit a full proposal.

The RFP is developed by the Watershed Assistance staff of the NHDES Watershed Management Bureau, Water Division (see Section II above). It is reviewed and approved by the EPA Nonpoint Source Coordinator for New Hampshire. Both the NHDES priorities and EPA National NPS Guidelines are considered during development of the RFP and the pre-proposal stage. The RFP requirements, evaluation criteria, and project selection process are summarized below.

a. NPS Watershed Projects

Typical projects funded under Section 319 include watershed surveying, watershed management planning, and watershed implementation projects. Watershed surveying projects that involve microbial source tracking or stream morphology data collection must meet the quality objectives and project guidelines specified in the *Generic Quality Assurance Project Plan for Microbial Source Tracking* (NHDES, 2010) and the *Generic Quality Assurance Project Plan for Stream Morphology Data Collection* (Sean Sweeney and Susan Simpson, Provan & Lorber, Inc, 2008), respectively. All other projects conducting watershed surveying will submit a SSPP for review and approval by DES in Attachment A. Watershed management planning projects must follow the NHDES *Guidance for Developing Watershed Management Plans* (Attachment F). Further, projects that control pollutant loading to receiving waters, such as watershed implementation projects, require a pollutant load reduction estimate to be conducted and submitted to NHDES. All projects that use secondary data must submit metadata to NHDES to verify that quality objectives are met.

Load Reduction Estimates:

The pollutant loads controlled (i.e., nutrients and sediments) as a result of implementation efforts are estimated, through the use of simple models, and in accordance with EPA guidelines. EPA recognizes that, due to variability in the site and weather characteristics (among other factors), load reductions associated with BMP projects are extremely difficult to accurately derive. Accordingly, rough load reduction estimates for New Hampshire 319 projects are developed using simple models or equations and calculated by the grant recipients. NHDES and grantees use the estimates as a means to report one of the benefits of an NPS project.

National Section 319 program guidelines require that estimates of pollutant load reduction be developed for projects that will result in reductions of either sediment or nutrients (nitrogen and phosphorus). NHDES requires, as a condition of the grant agreement, that grantees report estimated load reductions as a result of watershed implementation activities using the Pollutants Controlled Report, contained in Attachment H of the *NHDES Nonpoint Source Grant Administrative Guidelines – New Hampshire Nonpoint Source Grants Program, March 2013* (see Attachment E of this document).

To estimate pollutant load reductions, NHDES recommends that grantees use one of the following models for load reduction estimates, as appropriate.

- **STEPL** (v. 4.1), Spreadsheet Tool for Estimating Pollutant Load
<http://it.tetrattech-ffx.com/steplweb/>.
- **Region 5 Model**
<http://it.tetrattech-ffx.com/steplweb/>
- **NH Residential Loading Model**
<http://des.nh.gov/organization/divisions/water/stormwater/stormwater-mgmt-homeowners.htm>
- **NH Simple Method Spreadsheet**
http://des.nh.gov/organization/divisions/water/wmb/section401/documents/simple_method.xls

The grantee must complete the QA Checklist for BMP Pollutant Loading Analysis (Attachment C) and submit it to NHDES for review and approval. A grantee may elect to use a model other than those listed above provided the following information is submitted and approved by NHDES.

1. The rationale for model selection.
2. The name, date, revision number, & organization/individual that developed the model.
3. A copy of the model guidance.
4. A description and justification of any modifications that will be made to the model.

NPS watershed projects often involve the compilation and use of pre-existing (i.e., secondary) watershed or water quality data. If a project uses secondary data, the following documentation is required:

1. The type of data to be used.
2. The source(s) of the data.
3. The process to be used to determine that the quality of the data is acceptable for use in calculating the existing water quality.

b. Request for Proposal Requirements

The annual RFP describes the NPS program, eligibility, project requirements, evaluation criteria, instructions, NHDES contact information, and provides a template for preparing the proposal.

The *Full Proposal Information Packet* describes the project requirements, deadline and submission methods, a timetable for grant agreement processing, and appropriate NHDES contacts. The *Full Proposal Form* is a template for preparing the full proposal and includes all of the necessary sections to develop a scope of work for the project. An example proposal template from 2013 is in Attachment D.

c. Proposal Selection Criteria

Each member of the Watershed Assistance Section grants review team individually evaluates the proposal submissions and ranks them based on the following selection criteria:

Criteria		Max Points
Water Quality Improvement (either/or)	Impaired Waters: Project will achieve or lead to removing an impairment from the 305(b) list, resulting in a 319 Success story (see http://water.epa.gov/polwaste/nps/success319/).	35
	High Quality Waters: Project will achieve or lead to quantifiable progress toward water quality goals in high quality watershed.	25
Cost to Benefit Ratio	Ranking will assign the highest scores to projects that achieve or lead to the most significant water quality benefit per dollar.	15
Local Capacity	Commitment of the applicant’s support network, and capacity to complete the proposed project. Ranking will be based upon the grantee’s description and/or demonstration of their team’s ability to successfully complete the proposed project.	25
Relative Value of the Water body	The degree to which the public currently uses and values the water body. Consider the availability (access), and extent of use. Consider uses including, but not limited to: drinking water supply; public recreational opportunities; aquatic and terrestrial habitat benefits; and potential for increased public use and improved habitat	15
Proposal Thoroughness	General quality and completeness of the application package.	10
Bonus	Implements completed watershed-based plan (5 pts) Implements nitrogen-reducing BMPs in Great Bay (5 pts) Likely to de-list hydromodification impairment (5 pts)	10
Total Maximum Points		110

d. Proposal Review, Selection, and Approval Process

Grantees submit pre-proposals to the NHDES Grant Assistant who screens them for completion and compliance with national Section 319 Nonpoint Source guidelines before distributing them to the Review Committee. A Review Committee, made up of NHDES staff members in the Watershed Management Bureau, reviews and ranks the project pre-proposals. Reviews are based on the pre-proposal selection criteria described above.

The Review Committee meets to discuss the pre-proposals, share information, and recommend funding amounts for selected projects. If a committee member has applicable information that would alter a given NHDES score, it is discussed at the committee meeting and scoring revisions are made, if applicable. Based upon the total overall score, the top ranking projects are selected for funding. NHDES staff may request that grant applicants attend pre-selection interviews to present their projects, clarify project outcomes, and discuss the project in greater detail with members of the review committee. After the interview, projects deemed to have the greatest likelihood for success will be invited to submit a full proposal. The number of projects invited to submit a full proposal is dependent upon the estimated project costs and the funding available.

The proposed projects are sent to EPA for review and approval. The proposed project list is then sent to the NHDES Watershed Management Bureau Administrator, the NHDES Water Division Director, and the NHDES Commissioner for notification. When project selection is finalized, each project is assigned a NHDES Project Manager to act as the primary contact between the grantee and NHDES and to assist the grantee in successfully completing the project. The assigned Project Manager

contacts their grantees to develop a formalized scope of work for the grant agreement. This is typically accomplished by holding a scoping meeting with the Project Manager and grantee.

e. Grant Agreement

Using the scope of work developed from the scoping meeting between the NHDES Project Manager and the grantee, the NHDES Grant Assistant drafts a performance-based grant agreement using the Grant Agreement Template (contained in Attachment E). The general provisions, scope of work, contract price and method of payment, and any special provisions are documented in the grant agreement.

The grant agreement must have a notarized signature by an authorized representative of the organization receiving the funds. Authorization is granted by completion of the Certificate of Authority. In addition, any organization receiving funds that is not a government entity is required to submit a Certificate of Good Standing from the NH Secretary of State's office with the completed grant agreement.

f. Governor & Executive Council

Every grant agreement must receive the approval of the Governor and Executive Council before funds can be released. The schedule of Governor and Executive Council meetings is released at the beginning of each calendar year with meetings typically scheduled bi-monthly. Grant agreement documents must be submitted prior to the closing date deadline for the meeting. Closing dates are typically two weeks prior to each meeting date.

Prior to submitting the grant agreement, it must be entered into the Items Request Tracking (IRT) system. IRT is a Cognos™ database that is used to track all items requiring Governor and Executive Council approval from the Department. The Grant Assistant is responsible for entering items into IRT for the Nonpoint Source Grants Program.

The results of the Governor & Executive Council meetings are posted on the NH Governor & Executive Council website at: <http://www.sos.nh.gov/g&c%20minutes-New.htm> and are listed by meeting date. Approved items receive an "approved" stamp with a date of approval on the first page. Approved items are returned to the NHDES Grant Assistant who contacts the grantee to notify them of approval. Once the grant agreement is approved by the Governor & Executive Council, the project may begin.

g. Project Oversight and Assessment

A NHDES Project Manager is assigned to manage each project and to monitor Grantee performance under the Grant Agreement. The Project Manager will help ensure that work is carried out in accordance with the scope of work by conducting site visits, reviewing deliverables and invoices, maintaining regular contact with the Grantees, and providing assistance to resolve problems. The Project Managers' roles and responsibilities, problem resolution procedures, and documentation and reporting

are described in the NHDES document, *NPS Grant Administrative Guidelines* (Attachment E).

h. Reports and Deliverables

The Grant Agreement requires that Grantees submit deliverables and semi-annual progress reports to document progress throughout the project period. Semi-annual progress report forms are given by NHDES to the Grantee. The Grantee submits a final report upon completion of the project in accordance with the *319 Grant Program Final Report Guidelines* (contained in Attachment E). NHDES provides project deliverables, progress reports, and final project reports to EPA, as requested.

V. Documentation, Records, and Data Management

NHDES tracks all grant agreements using electronic files, the *NPS Grants Database* (an oracle-based database), and maintains a paper filing system for documents and records on each project. Paper and electronic filing systems, as well as the grants database, are described in detail in the *NPS Grant Administrative Guidelines*.

NHDES retains all project documents and records pertaining to the EPA Section 319 grant award to New Hampshire for a minimum of seven years in accordance with state regulations. After three years, paper copies of grant documents, including the grant agreement, financial statements (e.g., payment request forms, match and procurement documentation forms) are archived in accordance with EPA regulations. After seven years paper copies of grant documents can be expunged, however; at this time paper files are archived indefinitely. Final project deliverables, e.g., final reports or final work projects are kept permanently in electronic or paper format. Physical file storage space may dictate whether electronic or paper versions are retained. All paper files are kept in hanging file folders in the Watershed Assistance Section file cabinets. Electronic files are stored on the NHDES network drive (H drive), which is password protected, and are backed up nightly. Archived files are boxed by fiscal year and stored in the first floor storage area at the NHDES building at 29 Hazen Drive in Concord, NH.

VI. Continuous Improvement of the New Hampshire Nonpoint Source Program

a. Program Planning

The New Hampshire Nonpoint Source Program is guided by the EPA-approved *New Hampshire Nonpoint Source Management Plan*, developed by NHDES in 1989, updated in 1999, and being updated in 2013. Updates are made by NHDES staff and approved by EPA. The process of periodically updating this document allows for continuous improvement of the program by evaluating past activities, projects, successes, and failures and making adjustments and recommendations for the program to progress effectively to address current NPS challenges.

NHDES has a Performance Partnership Agreement (PPA) with EPA. The PPA is re-signed every three years and reviewed annually. It describes, in broad terms, the tasks that NHDES will accomplish with EPA funding. The PPA includes

descriptions of 319-related performance objectives, actions, and priorities and commitments.

The NHDES Watershed Assistance Section develops an annual work plan describing the anticipated activities, including the projects selected for funding under the annual RFP, for the NPS Program in the upcoming year. This work plan is reviewed and approved by EPA.

NHDES and EPA jointly review the Section 319 RFP and the 319 work plan format annually for changes and improvements. In addition, NHDES and EPA coordinate strategic planning efforts for targeting 319 restoration funding. This review provides an opportunity to modify the focus of pass-through projects, adjust priorities, and identify any new requirements.

b. Annual Reports & Project Evaluation

NHDES develops and submits to EPA an annual report summarizing the accomplishments of the NHDES NPS Program in the previous year. The annual report helps NHDES to assess the overall performance of the program and develop plans for future work.

NHDES evaluates all projects for successes achieved and lessons learned. The NHDES scope of work format is outcome based to provide measurable results. Throughout the project, the grantee and the assigned NHDES project manager are able to reference the tasks and milestones documented in the scope of work to determine if progress is being made and if milestones are being met. Upon the completion of a project, an assessment is made whether the completion of all of the milestones resulted in achieving the overall project goal. Successful completion of the milestones and project goals, as well as failures and lessons learned, are documented in the project final report.

In addition, when a 319-funded project achieves documented water quality improvements for waters that are primarily nonpoint source-impaired, a success story is written to summarize the project. Water quality improvements are demonstrated through the achievement of water quality standards for one or more pollutants/uses (i.e. removal from the state's section 303(d) list of impaired waters); measured in-stream reduction in a pollutant; or measured improvement in a parameter that indicates stream health (e.g., increases in fish or macroinvertebrate counts). Success stories also describe innovative strategies used to reduce nonpoint source pollution, the growth of partnerships and a diversity of funding sources. NHDES follows the EPA prescribed format for success stories and works with EPA Region 1 and headquarters on final stories to be published on EPA's national website.

c. Meetings and Conferences

The Watershed Assistance Section (WAS) is one of eight sections in the Watershed Management Bureau. WAS staff members hold regular team meetings, every six weeks, to discuss project updates and program activities, share information, and provide for planning and collaboration among WAS staff. In addition WAS staff meet

individually with the program supervisor each month to go over individual work plans.

From September through May, the Watershed Management Bureau holds monthly meetings for each section to present program information to the rest of the Bureau. Section supervisors also hold monthly meetings to assess and plan work activities.

Each spring the Watershed Management Bureau, in association with the New Hampshire Lakes Association and the New Hampshire Rivers Council, organize and host the New Hampshire Water and Watershed Conference. This conference addresses environmental topics related to lakes, rivers, and watersheds throughout the state. It provides an opportunity for town staff, watershed and lake organization members, professionals, academia, and other interested individuals an opportunity to network, learn, and collaborate with others in the state.

Beginning in 2009, the WAS has hosted an annual Water Manager's Roundtable. At this event, the state, EPA, and past, present, and possible future grantees come together to sharing watershed management success stories, barriers encountered, and lessons learned. This has been an extremely successful event. The agenda for each year is based on suggestions and needs expressed in the evaluation from the previous year.

Throughout the year, WAS staff attend various training sessions and workshops that are relevant to their positions. WAS staff attend the annual Nonpoint Source Conference hosted by the New England Interstate Water Pollution Control Commission (NEIWPCC). This provides an opportunity for further program improvements through learning and collaborating with other states in the region on NPS issues and activities.

VII. Attachments

Document	Attachment																				
<i>Site Specific Project Plan for Watershed Surveying Projects</i>	A																				
<i>Site Specific Project Plan for Watershed Management Planning Projects</i>	B																				
<i>QA Checklist for Pollutant Loading Analysis for BMP Implementation Projects</i>	C																				
<i>NHDES Request for Proposals FY 2013 Watershed Assistance Grants for Nonpoint Source Pollution Control Projects</i>	D																				
<p><i>NHDES Nonpoint Source Grant Administrative Guidelines – New Hampshire Nonpoint Source Grants Program, July 2008.</i></p> <p>The following documents are contained within the Administrative Guidelines Document as the following attachments:</p> <table border="0"> <tr> <td>NHDES Grant Agreement Template</td> <td>Attachment A</td> </tr> <tr> <td>NHDES Grant Agreement Amendment Template</td> <td>Attachment B</td> </tr> <tr> <td>Payment Request, Match & Procurement Documentation Form</td> <td>Attachment C</td> </tr> <tr> <td>Cost Sharing Agreement Template</td> <td>Attachment D</td> </tr> <tr> <td>Semi-Annual Progress Report Form</td> <td>Attachment E</td> </tr> <tr> <td>Pollutants Controlled Report</td> <td>Attachment F</td> </tr> <tr> <td>Final Report Guidelines</td> <td>Attachment G</td> </tr> <tr> <td>SOP for Photo Documentation</td> <td>Attachment H</td> </tr> <tr> <td>SOP for QAPP Review</td> <td>Attachment I</td> </tr> <tr> <td>BMP Tracking SOP</td> <td>Attachment J</td> </tr> </table>	NHDES Grant Agreement Template	Attachment A	NHDES Grant Agreement Amendment Template	Attachment B	Payment Request, Match & Procurement Documentation Form	Attachment C	Cost Sharing Agreement Template	Attachment D	Semi-Annual Progress Report Form	Attachment E	Pollutants Controlled Report	Attachment F	Final Report Guidelines	Attachment G	SOP for Photo Documentation	Attachment H	SOP for QAPP Review	Attachment I	BMP Tracking SOP	Attachment J	E
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