

Application Development Questions- State Resiliency Funding

- 1. If we've submitted an NOI on a prior project, one that maybe is in the queue right now, do we need to submit a separate NOI for this particular NOFO?**

The state asks that the NOI that was previously sent to the MT DES Mitigation team be re-forwarded to the MT DES team to us stating in the e-mail that you would like it to be considered for this notice of funding opportunity.

So, if you've already filled out and submitted for a previous application cycle please resubmit that same NOI to us with specifically stating you want to consider for the resiliency fund opportunity please.

- 2. For projects that had a BCA put together in the last year for a BRIC application, do we need to redo that BCA?**

The whole BCA does not need to be redone, but MT DES is going to ask you to verify that costs are still the same, and if the costs have changed, please update those in the BCA and conduct a recalculation.

- 3. Can a community submit more than one application?**

Yes, the community can submit more than one application. There's no limit on the number of applications a community can submit.

- 4. What is the total amount of Resiliency funds available? Is there a project cap?**

Right now, we believe that is just now shy of \$4 million dollars. Due to the interest in this funding opportunity a cap to resiliency dollars will be \$300,000 per application.

- 5. In this instance, are utility districts (such as water and sewer districts) considered special district governments?**

If you have taxing authority, is the FEMA definition of when they become eligible. If there is taxing authority within the special district, then yes, they are eligible as an applicant. If not, they would have to work with the local jurisdiction to apply.

- 6. Could this funding be used for recovery/restoration from the current flooding in Lincoln County?**

As long as we're showing that we're providing an increased level of protection from future events, potentially. You still would have to quantify that, and it can't address deferred maintenance issues if that makes sense.

- 7. Are projects submitted in September 2025 still considered in the prior pool?**

Yes, they still are being considered in the FEMA pool.

8. Can phased projects be considered? For example, a \$10M project that is trying to do a phase one of construction?

It can be considered however we would want to ensure that the work that you're doing can be independent of that second phase. So, there will be a benefit on its own in the completion of phase one. There is a risk reduction benefit in the completion alone of phase one.

[Additional context]: "Mitigation Projects must solve a problem independently," so if we are looking at a phase one of a construction project, if we can show that there is a reduction of risk and we are increasing the level of protection from what's currently in that location, then yes it could potentially be eligible as a phase one project, but it does independently have to provide those two things.

9. Will a project that can provide documentation of the historical damages be more competitive than a project that uses modeled or professionally estimated damages?

No, MT DES is just requiring that you all hit a benefit cost ratio of 1 to 1. Whether that use is through historical damages or professionally estimated damages. We're not giving preference one way or the other, as long as those professionally estimated damages come from a subject matter expert, like a licensed professional engineer that can run a model and provide documentation. If it were using professionally estimated damages, we would like to see the documentation to support those damages. But we're not giving weight to one over the other.

10. Can another grant be used for local match?

Yes, another grant can be used for match.

11. The 2025 guide still has the language in about projects that are under \$1,000,000 for a cost benefit narrative. Are you saying that any project that is a construction project will need to do need to do a cost benefit analysis regardless of that threshold?

Yes, at the federal level they've rescinded this option. We can no longer accept BCA narratives, in lieu of BCAs.

12. For projects that meet the pre-calculated benefits, can we use that or do we still need to go through the cost benefit analysis?

The pre-calculated benefit just makes the BCA toolkit easier. You can use the pre-calculated benefit in the toolkit for sure. But for a construction project it is still required.

13. Does a mitigation plan need to be approved by the NOI due date or the application date?

It just needs to be done by the application date.

14. What if the project removes property from the Special Flood Hazard Area (SFHA)?

We are not going to have a requirement on that. So, it's only if we're doing something to a property and the special flood hazard area, it remains in the special flood hazard area. But if we elevate it above the base flood elevation, we're still going to require the flood insurance on it.

[Additional Context]: If we did an elevation project, the state dollars are directly going to work on that specific private property, that's where it would make the flood insurance requirement if that property remains in a special flood hazard area.

15. Do capability/capacity apps require a benefit cost analysis or is that specific to mitigation projects?

Capacity and Capability applications do not require benefit cost analysis. It's strictly to the construction and implementation projects.

16. I need more information regarding the match and where it can come from?

The match can come from multiple sources, so if you have other grants that can be used against the project, you can use those grants as your match source. We're not going to limit the ability to pull money from other state grants, federal grants, local grants, private nonprofits. If you have another grant that can be used as match, it can also come from your general fund, or if you have a project where staff time will be used. We do have some of our jurisdictions that do construction projects, but they might use some of their public work staff to do some of the work, that can also count towards your match.

17. Can a local government apply to elevate a privately owned structure that would remain privately owned? And then would that property would be required to maintain flood insurance?

Yes, they can, if the local government is willing to sponsor the project, the applicant just has to be the local government not necessarily the property where the work is being done. Yes, if it stayed in the special Flood Hazard area. Yes, flood insurance perpetuity.

18. The likely \$300,000 limit, would that just be on the state funds, so could you have a \$400,000 project?

Yes, that's correct. \$300,000 is the max state share (75%), not the overall project costs.

19. Did you post the link to the Hazard Mitigation Assistance Guidance and Addendum?

<https://www.fema.gov/grants/mitigation/learn/hazard-mitigation-assistance-guidance>

20. Are BRIC applications still in the queue for review or are those apps no longer considered current?

There was a ruling by a judge that said that the cancellation of BRIC was unconstitutional, was essentially illegal, and they're directing them to reinstate the BRIC program, or at least the projects that were cancelled were awaiting to hear more.

21. Do you have an idea of the ratio of mitigation funding vs. the capability? Do you have an amount of funding you hope to put towards capability?

The priority is construction type projects; however, MT DES is open to see what applications are submitted.

22. How quickly does the money have to be spent?

In terms of how quickly the money has to be spent, there will be a three-year period of performance with the funding when it's awarded, there will be an opportunity to extend that period of performance but only under extreme circumstances. If there were delays, such as supply chain delays, significant weather delays, the expectation is when these funds are awarded. We want to see progress starting immediately, whether it's a procurement process, whatever that looks like. Even though the pilot program ends at the end of state fiscal year 2027, the funds get obligated at the time we execute the obligation document with the state. So, three years from the date of that obligation.

23. Will the application follow the application outline in Section B.2. of the FEMA HMA Guide?

Yes, the application elements that we have it pretty much follows, we are going to require that anybody that applies for this funding, that you have a local hazard mitigation plan that has been approved by FEMA and is adopted at the local level that has to be in place by the time you submit your applications in March.

24. What will be the level of effort needed to prepare a funding application? Will it be similar to BRIC application?

The level of effort that needs to go into an application will not be as arduous as BRIC, but there is a lot of the same information, especially if we're looking at a construction project. We're going to require the benefit cost analysis and then you know, we're going to ask for a detailed scope of work that aligns with the project schedule as well as the budget. In our review process, the state has a better understanding of Montana, what Montana's needs are.

25. Is there a recommended range of funding request for either category?

No there's not a recommended range of funding request for either one of those categories and local jurisdictions and state agencies can submit as many applications as they like. We're not limiting the number of applications submitted by a jurisdiction as well.

26. If you are currently receiving a MT DES Hazard Mitigation Grant, are applicants eligible to apply for MT Resiliency Funding?

Yes, there is no restriction on who can apply, especially if you are already receiving funding.

27. Related to the 5% management/admin costs – if an applicant takes all of the 5% would that make any of their sub-awardee's ineligible for admin costs?

The management costs just go to the agency that applied for the grant.

28. The Checklist Functions aren't working in Application how should I proceed?

MT DES is aware of this function is not working. As we are working on this issue, please just highlight your response for now.

29. Are Pre-Award Costs Eligible?

No. for this funding opportunity they are not.

30. Will we be able to request a budget modification for cost overruns?

No. this funding opportunity has a fixed amount so there will be no option to request additional funding due cost overruns, those additional funds will have to come from the subapplicant.

31. What Does CTP Mean in the application under the Evaluation Section?

CTP is Cooperating Technical Partner. This can be answered Yes, as the State is.

32. How do I know if my Community is in the CRS (Community Rating System), under the Evaluation Section?

You can reach out to your local floodplain coordinator; they will be able to inform you.