GRANTS
OF
GEORGIA DEPARTMENT OF NATURAL RESOURCES
COASTAL RESOURCES DIVISION

CHAPTER 391-2-5
COASTAL INCENTIVE GRANT PROGRAM DESCRIPTION

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391-2-5-.01 Coastal Incentive Grant Program, Match, Term and Reimbursement.
The Georgia Department of Natural Resources (DNR), Coastal Resources Division (CRD), solicits proposals for Coastal Incentive Grants (CIG) awarded under the Georgia Coastal Management Program (GCMP). The following announcement provides background and describes funding priorities, selection criteria, and application procedures.

This Request for Proposals solicits projects that are related to the themes identified by the Coastal Advisory Council (CAC) for the FY2020-2021 Cycle 23 awards. Projects that are acceptable but for which there are no available funds may be awarded a CIG at a later date if funds become available.

All CIG applications must be matched annually $1.00 federal to $1.00 local (1:1). Match may be either cash from local, state or private sources or “in-kind” service(s).

If selected, CIG Cycle 23 contracts will run for one year beginning October 1, 2020 through September 30, 2021. Applications will be accepted for two-year sub-grant requests with the second year of support contingent upon approval and receipt of federal funds. Year 1 funding is not transferable to Year 2, if applicant submits a two (2) year project.

CIGs are reimbursable sub-grants. A Request for Reimbursement of federal project costs, along with a report of applicable non-federal match, is to be submitted with the Final Report, using the

format provided by the DNR. Reimbursement will be made following completion of the terms of the sub-grant contract and receipt and performance of all deliverables for each sub-grant year.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.02 Mission Statement.
It is the mission of the GCMP to balance economic development in Georgia's coastal area with preservation of natural, environmental, historic, archaeological, and recreational resources for the benefit of Georgia's present and future generations.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.04 Eligibility and Contract Requirements.
CIG applicants must meet the following Minimum Eligibility Requirements:

Eligible Entities: Only Georgia Qualified Local Governments (counties and municipalities approved by the Georgia Department of Community Affairs) in the eleven-county coastal area, Georgia state government agencies (except DNR), and Georgia government affiliated educational and research institutions are eligible for a CIG sub-grant award. Applications from other parties will be considered if sponsored by an eligible entity.

Eligible projects must concentrate entirely or be physically located within at least one of the eleven (11) designated Georgia counties within the GCMP service area. GCMP eligible counties include Brantley, Bryan, Camden, Chatham, Charlton, Effingham, Glynn, Liberty, Long, McIntosh, and Wayne.

Equal Opportunity: The applicant must comply with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, The Age Discrimination Act of 1975, The Americans with Disabilities Act of 1990, and all other state and federal laws of non-discrimination. The applicant must certify that no person shall be discriminated against on the basis of race, color, sex, religion, national origin, age, or physical or mental handicap for any program, activity, or facility sponsored, operated, or constructed under the sub-grant project.

State and Federal Laws/Regulations: The applicant must comply with all existing laws and regulations for receiving and expending state and federal grant money including, but not limited to, public notices, bidding and purchasing requirements, and the Georgia Environmental Policy Act. Proposed projects must comply with existing state and federal environmental laws, rules, and regulations including, but not limited to, the Coastal Marshlands Protection Act, the Shore Protection Act, the Georgia Coastal Management Act, the federal Clean Water Act, the Georgia Clean Water Quality Control Act, the federal Endangered Species Act, and the Georgia Endangered Wildlife Act. If the applicant is a county or municipal government, the applicant must be in compliance with the Georgia Planning Act and be certified as a Qualified Local Government as defined by the Act before any Program funds will be awarded.

Applicability: The applicant must include a statement explaining how the project furthers the GCMP mission, goals, and policies. The statement must begin with "This project furthers the GCMP mission by…" and then be completed with how the project ties back to the mission stated in Section 391-2-5-.02.

Sub-grant Contract: A legally binding contract will be executed between the sub-granting organization (DNR) and recipients of sub-grant awards (Applicant). The contract will set forth the program requirements, sub-grant conditions, and define the project scope of work, deliverables, and timeline with milestones of accomplishments.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.05 Awards.
Applicants may apply for up to **$80,000** per year in a federal fund request so long as the proposed project is related to one or more funding theme priorities designated in Section 391-2-5-.06. Projects that involve low-cost construction or land acquisition must follow the terms and conditions in the most recent version of NOAA's 306A Guidance document. All low-cost construction and acquisition projects require a pre-application meeting and site visit by DNR staff. See Section 391-2-5-.08 for greater detail regarding construction/acquisition project terms. Up to two-year proposals will be accepted, as per conditions stated in Section 391-2-5-.01.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.06 Funding Themes.
The themes of the FY 2020-2021 Cycle 23 CIG Program as adopted by the CAC are (bulleted items are provided only as examples):

Oceans and Wetlands
- Maintaining or improving the quality of wetlands
- Conservation and restoration of wetland habitats
- Improved understanding of ocean and wetland habitats and functions

Public Access and Land Conservation
- Add or enhance physical access for the public to coastal water resources (i.e. rivers, wetlands, beaches)
- Public access planning
- Conservation of riparian habitats through acquisition
- Land conservation, preservation, and/or management, especially for sea level rise retreat
- Analysis of land conservation needs and opportunities for habitat protection

Sustainable Communities
- Strengthen local capacity to implement sustainable approaches in planning and development
- Increase understanding of costs and benefits associated with sustainable approaches to coastal development
- Identification and preservation of unique community qualities, historical and cultural features, including public education of the above

Disaster Resiliency and Coastal Hazards
- Improve understanding of coastal hazards and potential impacts
- Develop, implement or incorporate adaptation and mitigation strategies/plans or policies
- Strengthen local capacity to implement FEMA's Community Rating System

Non-Point Source Pollution

- Improvements to existing urban runoff control structures in coastal watersheds
- Projects that address stormwater quantity and quality improvements utilizing BMPs recommended by the Georgia Coastal Stormwater Supplement
- No construction projects are eligible under this theme

Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.08 Construction/Acquisition Projects and Terms.

Allowable construction/acquisition activities are defined under Section 306A of the Coastal Zone Management (CZM) Act, and as such are defined by statute. Theme related construction/acquisition projects are limited to a federal request of $80,000, may be up to two (2) year projects, and must abide by the terms and conditions in the most recent version of NOAA's 306A guidance document. Applicants may be asked to revise the scope of work of construction projects to meet eligibility guidelines and/or NOAA's 306A guidance document. All construction or land acquisition projects must undergo a pre-application site visit by DNR staff prior to submittal of a full application, if invited to submit such. NOAA is currently revising the 306A guidance document and construction/acquisition project terms may be subject to change prior to project start depending on the effective date of the new guidance.

Applicants must meet the objectives and allowable use guidelines under Section 306A of the Coastal Zone Management Act to be considered. At this time, refer to the 1999 Coastal Zone Management Act Section 306A guidance document for full text of objectives and uses. In summary, sub-grants for construction/acquisition projects made under Section 306A may be used for the following activities only:

- The acquisition of fee simple and other interests in land;
- Low-cost construction projects, including but not limited to, paths, walkways, fences, parks, and the rehabilitation of historic buildings and structures;
- The rehabilitation or acquisition of piers to provide increased public use, including compatible commercial activity;
- The establishment of shoreline stabilization measures including the installation or rehabilitation of bulkheads for the purpose of public safety or increasing public access and use;
- The removal or replacement of pilings where such action will provide increased recreational use of urban waterfront areas;
- Engineering designs, specifications, and other appropriate reports related to these activities; and
- Educational, interpretive, and management costs and other related costs NOAA determines to be consistent with the purposes of this section.

Georgia Historic Preservation Division (HPD): All construction projects must obtain a clearance letter from the Georgia HPD stating no significant impact, or specifying project conditions, as required under Section 106 of the federal Historic Preservation Act of 1966. Applications are considered incomplete and the project cannot begin until a clearance letter from HPD has been

returned to the DNR-CRD. It is the applicant's responsibility to provide the HPD clearance letter as a supporting document of the RFP.

Endangered Species Act: All construction projects must obtain a letter from the US Fish and Wildlife Service (FWS) stating there will be no significant impacts, or specifying project conditions, from the proposed project according to Section 7 of the Endangered Species Act.

Applications are considered incomplete and the project cannot begin until a clearance letter from the FWS has been returned to the DNR-CRD. It is the applicant's responsibility to provide the FWS clearance letter as a supporting document of the RFP.

NOAA Involvement: All construction project proposals are required to submit a completed 306A Project Questionnaire with their application including documentation in the form of reports, permits, coordination letters from state and federal agencies, maps, and photographs when necessary. Work cannot begin on any construction project until the 306A Project Questionnaire has been reviewed, approved, and signed by NOAA's Coastal Programs Division Chief and the DNR-CRD.

Additionally, federally funded projects are required by the National Environmental Policy Act (NEPA) of 1969 to assess the environmental impact(s) (Public Law 91-190, as amended; 82 Stat. 852, as amended; 42 U.S.C. 4321-4347). NOAA is responsible for determining and advising whether a proposed sub-grant project is eligible for a categorical exclusion in accordance with NOAA's NEPA regulations.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.10 Budget, Match Requirements and Indirect Costs.
All funding components must be supported by a direct line item budget. Applicant overhead cost must be itemized and included as a direct expense. As per the OMB 2 C.F.R. 200 Circular (Uniform Guidance), indirect cost rates, percentages, or contingencies will be considered as allowable costs for reimbursement or match, in whole or part, as preferred by the applicant, under the CIG program. The applicant must include a statement of the federally negotiated indirect cost rate in the budget narrative, as well as proof of the agreement. If the applicant has never had a federally negotiated indirect cost rate agreement, then a maximum 10% de minimis indirect cost rate is allowable, unless otherwise negotiated between the applicant and DNR-CRD at the applicant's discretion.

The applicant must match the federal funds requested through the CIG program. The minimum required match ratio for CIG sub-grants is $1.00 federal to $1.00 local (1:1) for all projects. A 1:1 match must be accrued for each year of the project. Match may be either cash from local, state, or private sources; or "in-kind service(s)". Generally, funds from other federal agencies may not be used as match, unless the program authorization for that funding program indicates that their funds may be used to meet an applicant's local share. If federal dollars are to be used as match, the applicant must provide a copy of the authorizing language or a statement from the federal agency that it is allowable, including a statutory citation for the authorizing language.

In-Kind Match: A match source that is considered "in-kind services" must meet the following criteria:

- Verifiable from your records
- Directly attributable to the project
- Personnel time must be documented and submitted with the appropriate form
- Performed or provided within the contracted period
- Personnel salary or in-kind labor cannot be derived from any other federally assisted program and cannot be paid by the federal government under another award.

The federal Coastal Zone Management Act predetermines match requirements.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.12 RFP Application Submittal.
The 2020-2021 FY Cycle 23 CIG opportunity will involve a competitive pre-application process followed by an invitation only competitive full application process. The detailed CIG pre- and full application instructions, format, and standard required forms are available on the DNR-CRD website.

Pre-Application Process: **Pre-applications must be received by 4:30pm on Friday, December 6, 2019**. Pre-applications will have a maximum limit of five (5) total enumerated pages (excluding the cover sheet), single-spaced typed text with 12-point font and 1-inch margins. Applicants must submit a completed and signed cover sheet (as provided by DNR-CRD) and succinctly summarize the project goals, relevance to coastal management, tasks to be performed, and an overall estimated budget as outlined in the pre-application instructions found on the aforementioned DNR-CRD website. Pre-applications must be submitted via email in pdf or Microsoft Word format by the due date and time to the CZM Grants Coordinator at CIGgrants@dnr.ga.gov. Pre-applications will be competitively reviewed and only those selected will be invited to submit a full application. Applicants will be notified by January 13, 2020 if they have been selected.

Full Application Process: Applicants with selected pre-applications will be invited to submit a full application. **Full applications must be received by 4:30pm on Friday, February 14, 2020**. Full applications will have a maximum limit of twelve (12) total enumerated pages, single-spaced typed text with 12-point font and 1-inch margins. The required cover sheet, budget narrative, standard budget forms, and any supplemental information is not included in the 12-page limit. In addition to the pre-application information, the full application should also include specific and detailed task descriptions by year, a project timeline with major milestones, project management information, a detailed yearly budget breakdown with narrative, and all supporting documentation as outlined in the full application instructions found on the aforementioned DNR-CRD website. Full applications should be secured with paper or binder clips. Do not spine-bind, staple or use report covers or folders. Facsimiles and email submissions of the full application will not be accepted. The full application packet must be submitted by mail by the due date and time with two (2) single-sided signed originals, five (5) double-sided copies and one (1) digital version in Microsoft Word format on a flash drive to:

Grants Coordinator
Georgia DNR-CRD
One Conservation Way
Brunswick, GA 31520

Applications received after the deadline will not be accepted.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.13 Application Review Process.
Applications must be submitted with a cover page, proposal, required forms, and supporting documentation as described in the detailed CIG application instructions located on the DNR-CRD website.

Pre-Application Process: Following the submittal of the pre-application, the CZM Grants Coordinator will schedule the Pre-Application Review Team, which may be comprised of Coastal Zone Management (CZM) Technical Assistance staff; the CZM Program Manager; and CRD Habitat, Fisheries, Shellfish, and/or Education and Outreach staff. The Team will review and competitively rank the pre-applications based on 1) applicability to the GCMP mission, goals, and policies, 2) a demonstrated coastal management need, 3) clear project goals, 4) budget soundness, 5) an applicant's past performance, and 6) relationship to other federal funding. Selected applicants will be invited to submit a full application.

Full Application Process: Upon selection of the pre-applications, the CZM Grants Coordinator will schedule the CIG Technical Review Committee, which is comprised of five (5) coastal community professionals from the following fields: state resource management, local government, non-governmental organization, academia, and citizen-at-large. The Committee will review and preliminarily score the applications based on the criteria provided in Sections 391-2-5-.17 and 391-2-5-.18. The Committee will consider the applications in a roundtable forum from highest to lowest preliminary score. After careful consideration, final ranking will be determined by consensus. Full Applications that are recommended for funding by the Committee will be included in the DNR application for annual funding from the National Oceanic and Atmospheric Administration (NOAA) GCMP CZM Grant. NOAA makes the final review and approval of all CIG sub-grants. All applicants will be notified of Committee recommendation by April 29, 2020. All applicants will be notified of final NOAA approval by August 31, 2020.

Late, incomplete, and ineligible pre- and full applications will be returned to the applicant. Unsuccessful applicants may contact the CZM Grants Coordinator within 30 days of pre- or full application notification to discuss reason(s) for denial.
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.15 Timeline.

December 6, 2019, 4:30pm	Pre-application deadline
February 14, 2020, 4:30pm	Full Application deadline
August 31, 2020	NOAA approval (anticipated)
October 1, 2020	Project start date

Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.16 Contact Information.

Grants Coordinator
Georgia Coastal Management Program
Department of Natural Resources-Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520-8687
Phone: (912) 264-7218
CIGgrants@dnr.ga.gov

Authority O.C.G.A. Secs. 12-5-323, 28-5-123

391-2-5-.17 Non-Research Project Evaluation Criteria.

Project proposals will be evaluated on a numerical scale based upon the following criteria. Total points available = 140

_____Problem Statement (Max 15 points)

8-15 points: The proposal clearly defines the problem or issue and describes how the project will resolve the problem.

1-7 points: The proposal clearly defines the problem or issue; however, it does not clearly describe how the project will resolve the problem.

0 points: The proposal does not clearly define a problem or there is no connection shown between the project and the problem.

_____Project Outcomes (Max 15 points)

8-15 points: The project outcomes are clear and concise; the proposal shows how the outcomes are attainable and/or that they will produce useable results.

1-7 points: The project outcomes are clear; however, it is not clear that the outcomes are attainable and/or that they will produce useable results.

0 points: The project outcomes are not clear and concise.

_____Project Work Schedule, Deliverables and Budget (Max 15 points)

8-15 points: The project work schedule and budget are clearly stated, clearly linked, and provide a logical sequence to produce well-defined deliverables and the budget optimizes funding through an efficient use of funds as illustrated by budget and budget narrative.

1-7 points: The project work schedule and budget are clearly stated, clearly linked and provide a logical sequence to produce well-defined deliverables.

0 points: The project work schedule, deliverables and budget are unclear or unrealistic.

_____Coastal Resource Management and Planning / Practicality (Max 20 points)

11-20 points: The proposed project clearly describes its application to the Georgia Coastal Management Program mission and specifically identifies practical uses for the project information or project result (can be an educational experience or construction project) by coastal managers (federal, state and/or local level).

1-10 points: The proposed project clearly describes its application to the Georgia Coastal Management Program mission but does not specifically identify the practical use of the project information or result by coastal managers.

0 points: The proposed project does not clearly describe its application or utility to coastal managers.

_____Timing/Immediacy (Max 10 points)

6-10 points: The project can be done only at this time due to current circumstances and the proposal clearly describes and supports those circumstances.

1-5 points: The project may be done at some future time, but project benefits will be maximized if its completion can capitalize on current circumstances.

0 points: The project may be done at a future time with no significant ill effects accruing to the project benefits.

_____Planning Priority (Max 15 points)

8-15 points: The project is specifically identified by one or more federal, state, regional, and/or local plans. (Applicant must reference or attach a copy of the relevant section of the plan(s) in order to receive points.)

1-7 points: The project need is conceptually supported by one federal, state, regional, and/or local plan. (Applicant must reference or attach a copy of the relevant section of the plan(s) in order to receive points.)

0 points: The project is not identified or conceptually supported in a published plan.

_____Natural Resource Conservation, Protection, Restoration and Enhancement (Max 15 points)

1-15 points: Rank the degree to which the project will conserve, protect, restore, sustain, or enhance a coastal resource(s).

_____Community Partnership and Volunteer Involvement (Max 10 points)

6-10 points: The project involves cooperation with two or more coastal municipalities, community agencies or organizations, or volunteers will contribute a substantial amount of time and effort to the project. The application clearly describes how partners will contribute and does not just make a conclusory statement.

1-5 points: The project involves cooperation with one coastal municipality, community agency or organization, or volunteers will contribute a moderate amount of time and effort to the project.

The application clearly describes how the partner will contribute and does not just make a conclusory statement.

0 points: The project involves only the applicant agency and does not include the use of volunteers or partner organizations.

_____Communications Component (Max 15 points)

8-15 points: The proposed project clearly describes an educational and/or training component which provides information and findings to multiple audiences (i.e. scientific community, local government, general public, key stakeholders, etc.).

1-7 points: The proposed project clearly describes an educational and/or training component which provides information and findings to a specific targeted audience or the general public, but not to both

0 points: The proposed project does not clearly describe an educational and/or training component.

_____Matching of Sub-Grant Funds (Max 10 points)

10 points: The project provides other public and/or private investments (match) equal to or greater than 200% (i.e. 2:1) of the requested federal funds.

7 points: The project provides other public and/or private investments (match) equal to or greater than 150% (i.e. 1.5:1) of the requested federal funds.

4 points: The project provides other public and/or private investments (match) equal to or greater than 110% (i.e. 1.1:1) of the requested federal funds.

0 points: The project does not provide more than the required 100% (i.e. 1:1) of the requested federal funds.

_____REVIEWER TOTAL (Max 140 points)

Reviewer's Comments:
Authority O.C.G.A. Secs. 12-5-323, 28-5-123.

391-2-5-.18 Research Project Evaluation Criteria.

Project proposals will be evaluated on a numerical scale based upon the following criteria. Total points available = 140

_____Problem Statement (Max 10 points)

6-10 points: The proposal clearly defines the problem or issue and describes how the project will resolve the problem.

1-5 points: The proposal clearly defines the problem, however, it does not clearly describe how the project will resolve the problem.

0 points: The proposal does not clearly define a problem or there is no connection shown between the project and the problem.

_____Project Outcomes (Max 10 points)

6-10 points: The project outcomes are clear and concise; the proposal shows how the goal and objectives are attainable and how useful information will be produced.

1-5 points: The project outcomes are clear and concise; however, it is not clear that the goal and objectives are attainable or that they will produce useable results.

0 points: The project outcomes are not clear and concise.

_____Project Work Schedule, Deliverables and Budget (Max 15 points)

8-15 points: The project work schedule and budget are clearly stated, clearly linked, and provide a logical sequence to produce well-defined deliverables and the budget optimizes funding through an efficient use of funds as illustrated by budget and budget narrative.

1-7 points: The project work schedule and budget are clearly stated, clearly linked and provide a logical sequence to produce well-defined deliverables.

0 points: The project work schedule, deliverables and budget are unclear or unrealistic.

_____Coastal Resource Management and Planning / Practicality (Max 20 points)

11-20 points: The proposed project clearly describes its application to the Georgia Coastal Management Program mission and specifically identifies practical uses for the project information or findings by coastal managers (federal, state and/or local level).

1-10 points: The proposed project clearly states its application to the Georgia Coastal Management Program mission, but the application does not specifically identify the practical use of the information or findings by coastal managers.

0 points: The proposed project does not state its application or utility to coastal managers.

_____Scientific Merit (Max 10 points)

6-10 points: The proposed project clearly demonstrates that it is based upon sound science and current research methodologies and will generate cutting-edge information and/or technology supportive of the goals and objectives of the Georgia Coastal Management Program.

1-5 points: The proposed project clearly demonstrates that it is sound science, but it is not clear how it will generate cutting-edge information and/or technology that is supportive of the goals and objectives of the Georgia Coastal Management Program.

0 points: The proposed project is not sound science.

_____Transferability to Practical Use (Max 20 points)

11-20 points: The application has clearly set out a process for transferring results and outcomes to practical use.

1-10 points: The application has clearly set out a process for transferring results, but outcomes have no practical use.

0 points: The application has no process for transferring results and outcomes to practical use.

_____Coastal Management Need (Max 10 points)

6-10 points: The application has clearly identified and described a coastal management need to be addressed, as per the CRD Needs List.

1-5 points: The application has clearly identified and described a coastal management need to be addressed, but it is not on the CRD Needs List.

0 points: The application has not clearly identified and described a coastal management need.

_____Immediacy (Max 10 points)

6-10 points: The proposed project clearly describes and fulfills an immediate research need of coastal resource managers.

1-5 points: The proposed project clearly describes and fulfills a coastal management research need, but the need is not necessarily immediate.

0 points: The proposed project does not describe nor fulfill a coastal management research need.

_____Community Partnership and Volunteer Involvement (Max 10 points)

6-10 points: The project involves cooperation with two or more coastal municipalities, community agencies or organizations, or volunteers will contribute a substantial amount of time and effort to the project. The application clearly describes how partners will contribute and does not just make a conclusory statement.

1-5 points: The project involves cooperation with one coastal municipality, community agency or organization, or volunteers will contribute a moderate amount of time and effort to the project. The application clearly describes how the partner will contribute and does not just make a conclusory statement.

0 points: The project involves only the applicant agency and does not include the use of volunteers or partner organizations.

_____Communications Component (Max 15 points)

8-15 points: The proposed project clearly describes an educational and/or training component which provides information and findings to multiple audiences (i.e. scientific community, local governments, general public, key stakeholders, etc.).

1-7 points: The proposed project clearly describes an educational and/or training component which provides information and findings to a specific targeted audience or the general public, but not to both.

0 points: The proposed project does not clearly describe an educational and/or training component.

_____Matching of Sub-Grant Funds (Max 10 points)

10 points: The project provides other public and/or private investments (match) equal to or greater than 200% (i.e. 2:1) of the requested federal funds.

7 points: The project provides other public and/or private investments (match) equal to or greater than 150% (i.e. 1.5:1) of the requested federal funds.

4 points: The project provides other public and/or private investments (match) equal to or greater than 125% (i.e. 1.25:1) of the requested federal funds.

0 points: The project does not provide more than the required 100% (i.e. 1:1) of requested federal funds in support of the project.

_____REVIEWER TOTAL (Max 140 points)

Reviewer Comments:

Authority O.C.G.A. Secs. 12-5-323, 28-5-123