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This Technical Memorandum is one of a series of publications designed to assist watershed projects, particularly those addressing nonpoint sources of pollution. Many of the lessons learned from the Clean Water Act Section 319 National Nonpoint Source Monitoring Program are incorporated in these publications.

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Technical Memorandum #1

Adjusting for Depreciation of Land Treatment When Planning Watershed Projects

Introduction

Watershed-based planning helps address water quality problems in a holistic manner by fully assessing the potential contributing causes and sources of pollution, then prioritizing restoration and protection strategies to address the problems (USEPA 2013). The U.S. Environmental Protection Agency (EPA) requires that watershed projects funded directly under section 319 of the Clean Water Act implement a watershed-based plan (WBP) addressing the nine key elements identified in EPA's *Handbook for Developing Watershed Plans to Restore and Protect our Waters (USEPA 2008)*. EPA further recommends that all other watershed plans intended to address water quality impairments also include the nine elements. The first element calls for the identification of causes and sources of impairment that must be controlled to achieve needed load reductions. Related elements include a description of the nonpoint source (NPS) management measures—or best management practices (BMPs)—needed to achieve required pollutant load reductions, a description of the critical areas in which the BMPs should be implemented, and an estimate of the load reductions expected from the BMPs.

Fields near Seneca Lake, New York.

Once the causes and sources of water resource impairment are assessed, identifying the appropriate BMPs to address the identified problems, the best locations for additional BMPs, and the pollutant load reductions likely to be achieved with the BMPs depends on accurate information on the performance levels of both BMPs already in place and BMPs to be implemented as part of the watershed project. All too often, watershed managers and Agency staff have assumed that, once certified as installed or adopted according to specifications, a BMP continues to perform its pollutant reduction function at the same efficiency (percent pollutant reduction) throughout its design or contract life, sometimes longer. An important corollary to this assumption is that BMPs in place during project planning are performing as originally intended. Experience in NPS watershed projects across the nation, however, shows that, without diligent operation and maintenance, BMPs and their effects probably will depreciate over time, resulting in less efficient pollution reduction. Recognition of this fact is important at the project planning phase, for both existing and planned BMPs.

Knowledge of land treatment depreciation is important to ensure project success through the adaptive management process (USEPA 2008). BMPs credited during the planning phase of a watershed project will be expected to achieve specific load reductions or other water quality benefits as part of the overall plan to protect or restore a water body. Verification that BMPs are still performing their functions at anticipated levels is essential to keeping a project on track to achieve its overall goals. Through adaptive management, verification results can be used to inform decisions about needs for additional BMPs or maintenance or repair of existing BMPs. In a watershed project that includes short-term (3–5 years) monitoring, subtle changes in BMP performance level might not be detectable or critical, but planners must account for catastrophic failures, BMP removal or discontinuation, and major maintenance shortcomings. Over the longer term, however, gradual changes in BMP performance level can be significant in terms of BMP-specific pollutant control or the role of single BMPs within a BMP system or train. The weakest link in a BMP train can be the driving force in overall BMP performance.

Application of and methods for BMP tracking in NPS watershed projects are described in detail in *Tech Notes 11* (Meals et al. 2014).

This technical memorandum addresses the major causes of land treatment depreciation, ways to assess the extent of depreciation, and options for adjusting for depreciation. While depreciation occurs throughout the life of a watershed project, the emphasis is on the planning phase and the short term (i.e., 3–5 years).

Causes of Depreciation

Depreciation of land treatment function occurs as a result of many factors and processes. Three of the primary causes are natural variability, lack of proper maintenance, and unforeseen consequences.

Natural Variability

Climate and soil variations across the nation influence how BMPs perform. Tiessen et al. (2010), for example, reported that management practices designed to improve water quality by reducing sediment and sediment-bound nutrient export from agricultural fields can be less effective in cold, dry regions where nutrient export is primarily snowmelt driven and in the dissolved form, compared to similar practices in warm, humid regions. Performance levels of vegetation-based BMPs in both agricultural and urban settings can vary significantly through the year due to seasonal dormancy. In a single locale, year-to-year variation in precipitation affects both agricultural management and BMP performance levels. Drought, for example, can suppress crop yields, reduce nutrient uptake, and result in nutrient surpluses left in the soil after harvest where they are vulnerable to runoff or leaching loss despite careful nutrient management. Increasing incidence of extreme weather and intense storms can overwhelm otherwise well-designed stormwater management facilities in urban areas.

Lack of Proper Maintenance

Most BMPs—both structural and management—must be operated and maintained properly to continue to function as designed. Otherwise, treatment effectiveness can depreciate over time. For example, in a properly functioning detention pond, sediment typically accumulates in the forebay. Without proper maintenance to remove accumulated sediment, the capacity of the BMP to contain and treat stormwater is diminished. Similarly, a nutrient management plan is only as effective as its implementation. Failure to adhere to phosphorus (P) application limits, for example, can result in soil P buildup and increased surface and subsurface losses of P rather than the loss reductions anticipated.

Jackson-Smith et al. (2010) reported that over 20 percent of implemented BMPs in a Utah watershed project appeared to be no longer maintained or in use when evaluated just 5 years after project completion. BMPs related to crop production enterprises and irrigation systems had the lowest rate of continued use and maintenance (~75 percent of implemented BMPs were still in use), followed by pasture and grazing planting and management BMPs (81 percent of implemented BMPs were still in use). Management practices (e.g., nutrient management) were found to be particularly susceptible to failure.

Practices are sometimes simply abandoned as a result of changes in landowner circumstances or attitudes. In a Kansas watershed project, farmers abandoned a nutrient management program because of perceived restrictive reporting requirements (Osmond et al. 2012).

Abandoned waste storage structure.

In the urban arena, a study of more than 250 stormwater facilities in Maryland found that nearly one-third of stormwater BMPs were not functioning as designed and that most needed maintenance (Lindsey et al. 1992). Sedimentation was a major problem and had occurred at nearly half of the facilities; those problems could have been prevented with timely maintenance.

Hunt and Lord (2006) describe basic maintenance requirements for bioretention practices and the consequences of failing to perform those tasks. For example, they indicate that mulch should be removed every 1–2 years to both maintain available water storage volume and increase the surface infiltration rate of fill soil. In addition, biological films might need to be removed every 2–3 years because they can cause the bioretention cell to clog.

In plot studies, Dillaha et al. (1986) observed that vegetative filter strip-effectiveness for sediment removal appeared to decrease with time as sediment accumulated within the filter strips. One set of the filters was almost totally inundated with sediment during the cropland experiments and filter effectiveness dropped 30–60 percent between the first and second experiments. Dosskey et al. (2002) reported that up to 99 percent of sediment was removed from cropland runoff when uniformly distributed over a buffer area, but as concentrated flow paths developed over time (due to lack of maintenance), sediment removal dropped to 15–45 percent. In the end, most structural BMPs have a design life (i.e., the length of time the item is expected to work within its specified parameters). This period is measured from when the BMP is placed into service until the end of its full pollutant reduction function.

Unforeseen Consequences

The effects of a BMP can change directly or indirectly due to unexpected interactions with site conditions or other activities. Incorporating manure into cropland soils to reduce nutrient runoff, for example, can increase erosion and soil loss due to soil disturbance, especially in comparison to reduced tillage. On the other hand, conservation tillage can result in accumulation of fertilizer nutrients at the soil surface, increasing their availability for loss in runoff (Rhoton et al. 1993). Long-term reduction in tillage also can promote the formation of soil macropores, enhancing leaching of soluble nutrients and agrichemicals into ground water (Shipitalo et al. 2000). Stutter et al. (2009) reported that establishment of vegetated buffers between cropland and a watercourse led to enhanced rates of soil P cycling within the buffer, increasing soil P solubility and the potential for leaching to watercourses.

Despite widespread adoption of conservation tillage and observed reductions in particulate P loads, a marked increase in loads of dissolved bioavailable P in agricultural tributaries to Lake Erie has been documented since the mid-1990s. This shift has been attributed to changes in application rates, methods, and timing of P fertilizers on cropland in conservation tillage not subject to annual tillage (Baker 2010; Joosse and Baker 2011). Further complicating matters, recent research on fields in the St. Joseph River watershed in northeast Indiana has demonstrated that about half of both soluble P and total P losses from research fields occurred via tile discharge, indicating a need to address both surface and subsurface loads to reach the goal of 41 percent reduction in P loading for the Lake Erie Basin (Smith et al. 2015).

Several important project planning lessons were learned from the White Clay Lake, Wisconsin, demonstration projects in the 1970s, including the need to accurately assess pollutant inputs and the performance levels of BMPs (NRC 1999). Regarding unforeseen consequences, the project learned through monitoring that a manure storage pit built according to prevailing specifications actually caused ground water contamination that threatened a farmer's well water. This illustrates the importance of monitoring implemented practices over time to ensure that they function properly and provide the intended benefits.

Control of urban stormwater runoff (e.g., through detention) has been widely implemented to reduce peak flows from large storms in order to prevent stream channel erosion. Research has shown, however, that although large peak flows might be controlled effectively by detention storage, stormflow conditions are extended over a longer period of time. Duration of erosive and bankfull flows are increased, constituting channel-forming events. Urbonas and Wulliman (2007) reported that, when captured runoff from a number of individual detention basins in a stream system is released over time, the flows accumulate as they travel downstream, actually increasing peak flows along the receiving waters. This situation can diminish the collective effectiveness of detention basins as a watershed management strategy.

Assessment of Depreciation

The first—and possibly most important—step in adjusting for depreciation of implemented BMPs is to determine its extent and magnitude through BMP verification.

BMP Verification

At its core, BMP verification confirms that a BMP is in place and functioning properly as expected based on contract, permit, or other implementation evidence. A BMP verification process that documents the presence and function of BMPs over time should be included in all NPS watershed projects.

At the project planning phase, verification is important both to ensure accurate assessment of existing BMP performance levels and to determine additional BMP and maintenance needs. Verification over time is necessary to determine if BMPs are maintained and operated during the period of interest.

Documenting the presence of a BMP is generally simpler than determining how well it functions, but both elements of verification must be considered to determine if land treatment goals are being met and whether BMP performance is depreciating. Although land treatment goals might not be highly specific in many watershed projects, it is important to document what treatment is implemented. Verification is described in detail in *Tech Notes 11* (Meals et al. 2014). This technical memorandum focuses on specific approaches to assessing depreciation within the context of an overall verification process.

Methods for Assessing BMP Presence and Performance Level

Whether a complete enumeration or a statistical sampling approach is used, methods for tracking BMPs generally include direct measurements (e.g., soil tests, onsite inspections, remote sensing) and indirect methods (e.g., landowner self-reporting or third-party surveys). Several of these methods are discussed in *Tech Notes 11* (Meals et al. 2014). Two general factors must be considered when verifying a BMP: the presence of the BMP and its pollutant removal efficiency. Different types of BMPs require different verification methods, and no single approach is likely to provide all the information needed in planning a watershed project.

Certification

The first step in the process is to determine whether BMPs have been designed and installed/adopted according to appropriate standards and specifications. Certification can either be the final step in a contract between a landowner and a funding agency or be a component of a permit requirement.

Certification provides assurance that a BMP is fully functional for its setting at a particular time. For example, a stormwater detention pond or water and sediment control basin must be properly sized for its contributing area and designed for a specific retention-and-release performance level. A nutrient management plan must account for all sources of nutrients, consider current soil nutrient levels, and support a reasonable yield goal. A cover crop must be planted in a particular time window to provide erosion control and/or nutrient uptake during a critical time of year. Some jurisdictions might apply different nutrient reduction efficiency credits for cover crops based on planting date. Some structural BMPs like parallel tile outlet terraces require up to 2 years to fully settle and achieve full efficiency; in those cases, certification is delayed until full stability is reached. Knowledge that a BMP has been applied according to a specific standard supports an assumption that the BMP will perform at a certain level of pollutant reduction efficiency, providing a baseline against which future depreciation can be compared. Practices voluntarily implemented by landowners without any technical or financial assistance could require special efforts to determine compliance with applicable specifications (or functional equivalence). Pollution reduction by practices not meeting specifications might need to be discounted or not counted at all even when first installed.

Depreciation assessment indicators

Ideally, assessment of BMP depreciation would be based on actual measurement of each BMP's performance level (e.g., monitoring of input and output pollutant loads for each practice). Except in very rare circumstances, this type of monitoring is impractical. Rather, a watershed project generally must depend on the use of indicators to assess BMP performance level.

The most useful indicators for assessing depreciation are determined primarily by the type of BMP and pollutants controlled, but indicators might be limited by the general verification approach used. For example, inflow and outflow measurements of pollutant load can be used to determine the effectiveness of constructed wetlands, but a verification effort that uses only visual observations will not provide that data or other information about wetland functionality. A central challenge, therefore, is to identify meaningful indicators of BMP performance level that can be tracked under different verification schemes. This technical memorandum provides examples of how to accomplish that end.

Nonvegetative structural practices

Performance levels of nonvegetative structural practices—such as animal waste lagoons, digesters, terraces, irrigation tailwater management, stormwater detention ponds, and pervious pavement—can be assessed using the following types of indicators:

- Measured on-site performance data (e.g., infiltration capacity of pervious pavement),
- Structural integrity (e.g., condition of berms or other containment structures), and
- Water volume capacity (e.g., existing pond volume vs. design) and mass or volume of captured material removed (e.g., sediment removed from stormwater pond forebay at cleanout).

In some cases, useful indicators can be identified directly from practice standards. For example, the Natural Resources Conservation Service lists operation and maintenance elements for a water and sediment control basin (WASCoB) (*USDA-NRCS 2008*) that include:

- Maintenance of basin ridge height and outlet elevations,
- Removal of sediment that has accumulated in the basin to maintain capacity and grade,
- Removal of sediment around inlets to ensure that the inlet remains the lowest spot in the basin, and
- Regular mowing and control of trees and brush.

These elements suggest that ridge and outlet elevations, sediment accumulation, inlet integrity, and vegetation control would be important indicators of WASCoB performance level.

Required maintenance checklists contained in stormwater permits also can suggest useful indicators. For example, the *Virginia Stormwater Management Handbook* (VA DCR 1999) provides an extensive checklist for annual operation and maintenance inspection of wet ponds. The list includes many elements that could serve as BMP performance level indicators:

- Excessive sediment, debris, or trash accumulated at inlet,
- Clogging of outlet structures,

- Cracking, erosion, or animal burrows in berms, and
- More than 1 foot of sediment accumulated in permanent pool.

Assessment of these and other indicators would require on-site inspection and/or measurement by landowners, permit-holders, or oversight agencies.

Vegetative structural practices

Performance levels of vegetative structural practices—such as constructed wetlands, swales, rain gardens, riparian buffers, and filter strips—can be assessed using the following types of indicators:

- Extent and health of vegetation (e.g., measurements of soil cover or plant density),
- Quality of overland flow filtering (e.g., evidence of short-circuiting by concentrated flow or gullies through buffers or filter strips),
- On-site capacity testing of rain gardens using infiltrometers or similar devices, and
- Visual observations (e.g., presence of water in swales and rain gardens).

Parking lot rain garden.

As for non-vegetative structural practices, assessment of these indicators would require on-site inspection and/or measurement by landowners, permit-holders, or oversight agencies.

Nonstructural vegetative practices

Performance levels of nonstructural vegetative practices—such as cover crops, reforestation of logged tracts, and construction site seeding—can be assessed using the following types of indicators:

- Density of cover crop planting (e.g., plant count),
- Percent of area covered by cover crop, and
- Extent and vitality of tree seedlings.

These indicators could be assessed by on-site inspection or, in some cases, by remote sensing, either from satellite imagery or aerial photography.

Management practices

Performance levels of management practices—such as nutrient management, conservation tillage, pesticide management, and street sweeping—can be assessed using the following types of indicators:

- Records of street sweeping frequency and mass of material collected,
- Area or percent of cropland under conservation tillage,

- Extent of crop residue coverage on conservation tillage cropland, and
- Fertilizer and/or manure application rates and schedules, crop yields, soil test data, plant tissue test results, and fall residual nitrate tests.

Illustration of line-transect method for residue.

Assessment of these indicators would generally require reporting by private landowners or municipalities, reporting that is required under some regulatory programs. Visual observation of indicators such as residue cover, however, can also be made by on-site inspection or windshield survey.

Data analysis

Data on indicators can be expressed and analyzed in several ways, depending on the nature of the indicators used. Indicators reporting continuous numerical data—such as acres of cover crop or conservation tillage, manure application rates, miles of street sweeping, mass of material removed from catch basins or detention ponds, or acres of logging roads/landings revegetated—can be expressed either in the raw form (e.g., acres with 30 percent or more residue cover) or as a percentage of the design or target quantity (e.g., percent of contracted acres achieving 30 percent or more of residue cover). These metrics can be tracked year to year as a measure of BMP depreciation (or achievement). During the planning phase of a watershed project, it might be appropriate to collect indicator data for multiple years prior to project startup to enable calculation of averages or ranges to better estimate BMP performance levels over crop rotation cycles or variable weather conditions.

Indicators reporting categorical data—such as maintenance of detention basin ridge height and outlet elevations, condition of berms or terraces, or observations of water accumulation and flow—are more difficult to express quantitatively. It might be necessary to establish an ordinal scale (e.g., condition rated on a scale of 1–10) or a binary yes/no condition, then use best professional judgment to assess influence on BMP performance.

In some cases, it might be possible to use modeling or other quantitative analysis to estimate individual or watershed-level BMP performance levels based on verification data. In an analysis of stormwater BMP performance levels, Tetra Tech (2010) presented a series of BMP performance curves based on monitoring and modeling data that relate pollutant removal efficiency to depth of runoff treated (Figure 1). Where depreciation indicators track changes in depth of runoff treated as the capacity of a BMP decreases (e.g., from sedimentation), resulting changes in pollutant removal could be determined from a performance curve. This type of information can be particularly useful during the planning phase of a watershed project to estimate realistic performance levels for existing BMPs that have been in place for a substantial portion of their expected lifespans.

The performance levels of structural agricultural BMPs in varying condition can be estimated by altering input parameters in the *Soil and Water Assessment Tool* (SWAT) model (Texas A&M University 2015a); other models such as the *Agricultural Policy/Environmental eXtender* (APEX) model (Texas A&M

University 2015b) also can be used in this way (including application to some urban BMPs). For urban stormwater, engineering models like HydroCAD (HydroCAD Software Solutions 2011) can be used to simulate hydrologic response to stormwater BMPs with different physical characteristics (e.g., to compare performance levels under actual vs. design conditions). Even simple spreadsheet models such as the Spreadsheet Tool for Estimating Pollutant Load (STEPL) (USEPA 2015) can be used to quantify the effects of BMP depreciation by varying the effectiveness coefficients in the model.

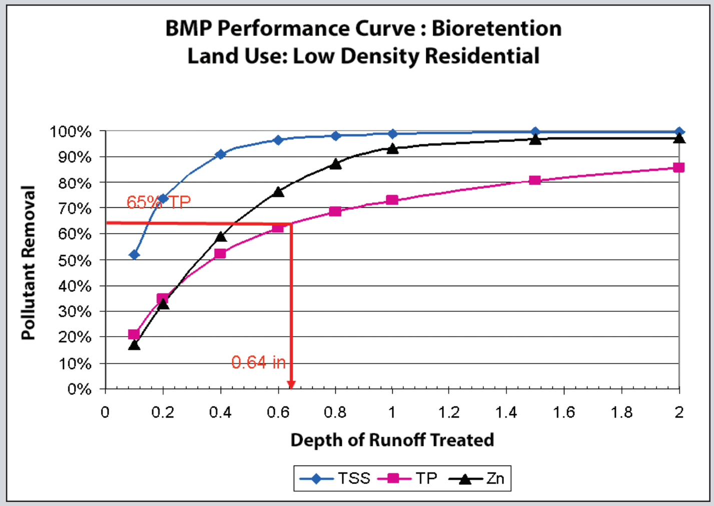

Figure 1. BMP Performance Curve for Bioretention BMP (Tetra Tech 2010).

Data from verification efforts and analysis of the effects of depreciation on BMP performance levels must be qualified based on data confidence. "Confidence" refers mainly to a quantitative assessment of the accuracy of a verification result. For example, the number of acres of cover crops or the continuity of streamside buffers on logging sites determined from aerial photography could be determined by ground-truthing to be within +10 percent of the true value at the 95 percent confidence level. Confidence also can refer to the level of trust that BMPs previously implemented continue to function (e.g., the proportion of BMPs still in place and meeting performance standards). For example, reporting that 75 percent of planned BMPs have been verified is a measure of confidence that the desired level of treatment has been applied.

While specific methods to evaluate data confidence are beyond the scope of this memo, it is essential to be able to express some degree of confidence in verification results—both during the planning phase and over time as the project is implemented. For example, an assessment of relative uncertainty of BMP performance during the planning phase can be used as direct follow-up to verification efforts to those practices for which greater quantification of performance level is needed. In addition, plans to implement new BMPs also can be developed with full consideration of the reliability of BMPs already in place.

Adjusting for Depreciation

Information on BMP depreciation can be used to improve both project management and project evaluation.

Project Planning and Management

Establishing baseline conditions

Baseline conditions of pollutant loading include not only pollutant source activity but also the influence of BMPs already in place at the start of the project. Adjustments based on knowledge of BMP depreciation can provide a more realistic estimate of baseline pollutant loads than assuming that existing land treatment has reduced NPS pollutant loads by some standard efficiency value.

Establishing an accurate starting point will make load reduction targets—and, therefore, land treatment design—more accurate. Selecting appropriate BMPs, identifying critical source areas, and prioritizing land treatment sites will all benefit from an accurate assessment of baseline conditions. Knowledge of depreciation of existing BMPs can be factored into models used for project planning (e.g., by adjusting pollutant removal efficiencies), resulting in improved understanding of overall baseline NPS loads and their sources.

While not a depreciation issue per se, when a BMP is first installed—especially a vegetative BMP like a buffer or filter strip—it usually takes a certain amount of time before its pollutant reduction capacity is fully realized. For example, Dosskey et al. (2007) reported that the nutrient reduction performance of newly established vegetated filter strips increased over the first 3 years as dense stands of vegetation grew in and soil infiltration improved; thereafter, performance level was stable over a decade. When planning a watershed project, vegetative practices should be examined to determine the proper level of effectiveness to assume based on growth stage. Also, because of weather or management conditions, some practices (e.g., trees) might take longer to reach their full effectiveness or might never reach it. The Stroud Preserve, Pennsylvania, section 319 National Nonpoint Source Monitoring Program (NNPSMP) project (1992–2007) found that slow tree growth in a newly established riparian forest buffer delayed significant NO_3–N (nitrate) removal from ground water until about 10 years after the trees were planted (Newbold et al. 2008).

The performance of practices can change in multiple ways over time. For example, excessive deposition in a detention pond that is not properly maintained could reduce overall percent removal of sediment because of reduced capacity as illustrated in Figure 1. The relative and absolute removal efficiencies for various particle size fractions (and associated pollutants) also can change due to reduced hydraulic retention time. Fine particles generally require longer settling times than larger particles, so removal efficiency of fine particles (e.g., silt, clay) can be disproportionally reduced as a detention pond or similar BMP fills with sediment and retention time deteriorates. Expert assessment of the condition and likely current performance level of existing BMPs, particularly those for which a significant amount of pollutant removal is assumed, is essential to establishing an accurate baseline for project planning.

Adaptive watershed management

Watershed planning and management is an iterative process; project goals might not all be fully met during the first project cycle and management efforts usually need to be adjusted in light of ongoing changes. In many cases, several cycles—including mid-course corrections—might be needed for a project to achieve its goals. Consequently, EPA recommends that watershed projects pursue a dynamic and adaptive approach so that implementation of a watershed plan can proceed and be modified as new information becomes available (USEPA 2008). Measures of BMP implementation commonly used as part of progress assessment should be augmented with indicators of BMP depreciation. Combining this information with other relevant project data can provide reliable progress assessments that will indicate gaps and weaknesses that need to be addressed to achieve project goals.

BMP design and delivery system

Patterns in BMP depreciation might yield information on systematic failures in BMP design or management that can be addressed through changes to standards and specifications, contract terms, or permit requirements. This information could be particularly helpful during the project planning phase when both the BMPs and their implementation mechanisms are being considered. For example, a cost-sharing schedule that has traditionally provided all or most funding upon initial installation of a BMP could be adjusted to distribute a portion of the funds over time if operation and maintenance are determined to be a significant issue based on pre-project information. Some BMP components, on the other hand, might need to be dropped or changed to make them more appealing to or easier to manage by landowners. Within the context of a permit program, for example, corrective actions reports might indicate specific changes that should be made to BMPs to ensure their proper performance.

Project Evaluation

Monitoring

Although short-term (3–5 year) NPS watershed projects will not usually have a sufficiently long data record to evaluate incremental project effects, data on BMP depreciation might still improve interpretation of collected water quality data. Even in the short term, water quality monitoring data might reflect cases in which BMPs have suffered catastrophic failures (e.g., an animal waste lagoon breach), been abandoned, or been maintained poorly. Meals (2001), for example, was able to interpret unexpected spikes in stream P and suspended sediment concentrations by walking the watershed and discovering that a landowner had over-applied manure and plowed soil directly into the stream.

Longer-term efforts (e.g., total maximum daily loads[1]) might engage in sustained monitoring beyond individual watershed project lifetime(s). The extended monitoring period will generally allow detection of more subtle water quality impacts for which interpretation could be enhanced with information on BMP depreciation. While not designed as BMP depreciation studies, the following two examples illustrate how changes in BMP performance can be related to water quality.

In a New York dairy watershed treated with multiple BMPs, Lewis and Makarewicz (2009) reported that the suspension of a ban on winter manure application 3 years into the monitoring study led to dramatic increases in stream nitrogen and phosphorus concentrations. First and foremost, knowledge of that suspension provided a reasonable explanation for the observed increase in nutrient levels. Secondly, the study was able to use data from the documented depreciation of land treatment to determine that the winter spreading ban had yielded 60–75 percent reductions in average stream nutrient concentrations.

The Walnut Creek, Iowa, Section 319 NNPSMP project promoted conversion of row crop land to native prairie to reduce stream NO_3-N levels and used simple linear regression to show association of two monitored variables: tracked conversion of row crop land to restored prairie vegetation and stream NO_3-N concentrations (Schilling and Spooner 2006). Because some of the restored prairie was plowed back into cropland during the project period—and because that change was

[1] "Total maximum daily loads" as defined in §303(d) of the Clean Water Act.

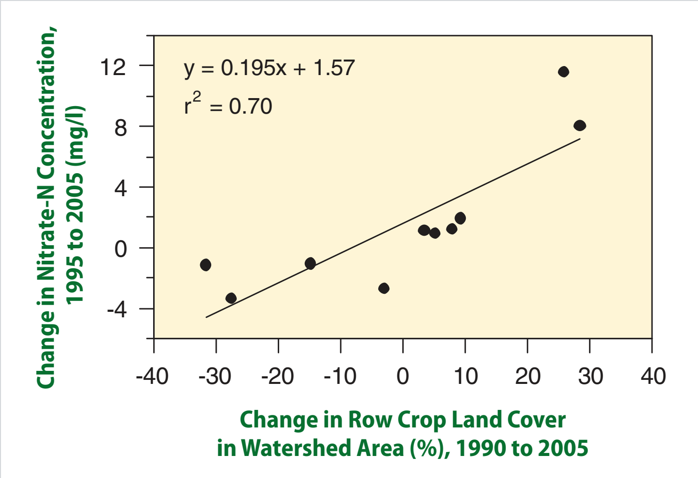

Figure 2. Relating Changes in Stream Nitrate Concentrations to Changes in Row Crop Land Cover in Walnut Creek, Iowa (Schilling and Spooner 2006)).

documented—the project was able to show not only that converting crop land to prairie reduced stream NO_3-N concentrations but also that increasing row crop land led to increased NO_3-N levels (Figure 2).

Modeling

When watershed management projects are guided or supported by modeling, knowledge of BMP depreciation should be part of model inputs and parameterization.

The magnitude of implementation (e.g., acres of treatment) and the spatial distribution of both annual and structural BMPs should be part of model input and should not be static parameters. Where BMPs are represented by pollutant reduction efficiencies, those percentages can be adjusted based on verification of land treatment performance levels in the watershed. Incorporating BMP depreciation factors into models might require setting up a tiered approach for BMP efficiencies (e.g., different efficiency values for BMPs determined to be in fair, good, or excellent condition) rather than the currently common practice of setting a single efficiency value for a practice assumed to exist. This approach could be particularly important for management practices such as agricultural nutrient management or street sweeping, in which degree of treatment is highly variable. For structural practices, a depreciation schedule could be incorporated into the project, similar to depreciating business assets. In the planning phase of a watershed project, multiple scenarios could be modeled to reflect the potential range of performance levels for BMPs already in place.

Recommendations

The importance of having accurate information on BMP depreciation varies across projects and during the timeline of a single project. During the project planning phase, when plans for the achievement of pollutant reduction targets rely heavily on existing BMPs, it is essential to obtain good information on the level of performance of the BMPs to ensure that plan development is properly informed. If existing BMPs are a trivial part of the overall watershed plan, knowledge of BMP depreciation might not be critical during planning. As projects move forward, however, the types of BMPs implemented, their relative costs and contributions to achievement of project pollutant reduction goals, and the likelihood that BMP depreciation will occur during the period of interest will largely determine the type and extent of BMP verification required over time. The following recommendations should be considered within this context:

- For improved characterization of overall baseline NPS loads, better identification of critical source areas, and more effective prioritization of new land treatment during project planning, collect accurate and complete information about:
  - Land use,

    - Land management, and
    - The implementation and operation of existing BMPs. This information should include:
        - Original BMP installation dates,
        - Design specifications of individual BMPs,
        - Data on BMP performance levels if available, and
        - The spatial distribution of BMPs across the watershed.
- Track the factors that influence BMP depreciation in the watershed, including:
    - Variations in weather that influence BMP performance levels,
    - Changes in land use, land ownership, and land management,
    - Inspection and enforcement activities on permitted practices, and
    - Operation, maintenance, and management of implemented practices.
- Develop and use observable indicators of BMP status/performance that:
    - Are tailored to the set of BMPs implemented in the watershed and practical within the scope of the watershed project's resources,
    - Can be quantified or scaled to document the extent and magnitude of treatment depreciation, and
    - Are able to be paired with water quality monitoring data.
- After the implementation phase of the NPS project, conduct verification activities to document the continued existence and function of implemented practices to assess the magnitude of depreciation and provide a basis for corrective action. The verification program should:
    - Identify and locate all BMPs of interest, including cost-shared, non-cost-shared, required, and voluntary practices;
    - Capture information on structural, annual, and management BMPs;
    - Obtain data on BMP operation and maintenance activities; and
    - Include assessment of data accuracy and confidence.
- To adjust for depreciation of land treatment, apply verification data to watershed project management and evaluation by:
    - Applying results directly to permit compliance programs,
    - Relating documented changes in land treatment performance levels to observed water quality,
    - Incorporating measures of depreciated BMP effectiveness into modeling efforts, and
    - Using knowledge of treatment depreciation to correct problems and target additional practices as necessary to meet project goals in an adaptive watershed management approach.

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