

Appendix C—Minimum Elements of a Watershed-based Plan

Although many different elements may be included in a watershed plan, EPA has identified nine minimum elements that are critical for achieving improvements in water quality. In general, EPA requires that nine-element watershed-based plans (WBPs) be developed prior to implementing project(s) funded with § 319 watershed project funding. In many cases, state and local groups have already developed watershed plans and strategies for their rivers, lakes, streams, wetlands, estuaries, and coastal waters that address some or all of the nine elements. EPA encourages states to use these plans and strategies, where appropriate, as building blocks for developing and implementing WBPs. If these existing plans contain all nine elements listed below, they can be used to fulfill the WBP requirement for watershed projects. If the existing plans do not address all nine elements or do not include the entire watershed planning area, they can still provide valuable components to inform, develop, and update WBPs.

For example, some watershed management plans contain information on hydrology, topography, soils, climate, land uses, water quality problems, and management practices needed to address water quality problems but lack the quantitative analysis of current pollutant loads or expected load reductions from proposed management practices. In this case, the WBP developer could incorporate such existing information into the plan to help fulfill the nine WBP elements. If separate documents contain information that help meet the nine WBP elements listed below but are too lengthy to be included in the WBP, they can be summarized and referenced in the appropriate sections of the plan, as long as the information is readily available.

Note: EPA recognizes that in select cases (outlined in section IX.B.ii of these guidelines) alternatives to WBPs can provide an effective roadmap to achieve the water quality goals of a § 319 funded watershed project. These alternative plans do not need to address the nine elements listed below, but must include the planning components listed in section IX.B.ii of these guidelines. EPA still encourages plan developers to build on prior planning efforts and incorporate related information, as described above, when developing these alternative plans.

Nine Elements of Watershed-based Plans (WBPs)

The nine elements, as well as short explanations of how each element fits in the context of the broader WBP, are provided below. Although they are listed as *a* through *i*, they do not necessarily take place sequentially. For example, element *d* asks for a description of the technical and financial assistance that will be needed to implement the WBP, but this can be done only after you have addressed elements *e* and *i*.

The level of detail needed to address the nine elements of WBPs will vary in proportion to the homogeneity or similarity of land use types and variety and complexity of pollution sources. For example, densely developed urban and suburban watersheds often have multiples sources of pollution from historic and current activities (Superfund sites, point sources, solid waste disposal, leakage from road salt storage, oil handling, stormwater-caused erosion, road maintenance, etc.) in addition to some agricultural activities. Plans will be more complex than in predominantly rural settings in these cases. For this reason, plans for urban and suburban watersheds may need to be developed and implemented at a smaller scale than watersheds with agricultural lands of a similar character.

Element a. Identification of causes of impairment and pollutant sources or groups of similar sources that need to be controlled to achieve needed load reductions, and any other goals identified in the watershed plan. Sources that need to be controlled should be identified at the significant subcategory level along with estimates of the extent to which they are present in the watershed (e.g., X number of dairy cattle feedlots needing upgrading, including a rough estimate of the number of cattle per facility; Y acres of row crops needing improved nutrient management or sediment control; or Z linear miles of eroded streambank needing remediation).

What does this mean?

Your WBP source assessment should encompass the watershed of the impaired waterbody(ies) throughout the watershed, and include map(s) of the watershed that locates the major cause(s) and source(s) of impairment in the planning area. To address these impairments, you will set goals to meet (or exceed) the appropriate water quality standards for pollutant(s) that threaten or impair the physical, chemical, or biological integrity of the watershed covered in the plan.

This element will usually include an accounting of the significant point and nonpoint sources in addition to the natural background levels that make up the pollutant loads causing problems in the watershed. If a TMDL or TMDLs exist for the waters under consideration, this element may be adequately addressed in those documents. If not, you will need to conduct a similar analysis (which may involve mapping, modeling, monitoring, and field assessments) to make the link between the sources of pollution and the extent to which they cause the water to exceed relevant water quality standards.

Element b. An estimate of the load reductions expected from management measures.

What does this mean?

On the basis of the existing source loads estimated for element *a*, you will similarly determine the reductions needed to meet water quality standards. After identifying the various management measures that will help to reduce the pollutant loads (see element *c* below), you will estimate the load reductions expected as a result of implementing these management measures, recognizing the difficulty in precisely predicting the performance of management measures over time.

Estimates should be provided at the same level as that required in the scale and scope described in element *a* (e.g., the total load reduction expected for dairy cattle feedlots, row crops, eroded streambanks, or implementation of a specific stormwater management practice). For waters for which TMDLs have been approved or are being developed, the plan should identify and incorporate the TMDLs; the plan needs to be designed to achieve the applicable load reductions in the TMDLs. Applicable loads for downstream waters should be included so that water delivered to a downstream or adjacent segment does not exceed the water quality standards for the pollutant of concern at the water segment boundary. The estimate should account for reductions in pollutant loads from point and nonpoint sources identified in the TMDL as necessary to attain the applicable water quality standards.

Element c. A description of the nonpoint source management measures that will need to be implemented to achieve load reductions in element b, and a description of the critical areas in which those measures will be needed to implement this plan.

What does this mean?

The plan should describe the management measures that need to be implemented to achieve the load reductions estimated under element *b*, as well as to achieve any additional pollution prevention goals outlined in the watershed plan (e.g., habitat conservation and protection). Pollutant loads will vary even within land use types, so the plan should also identify the critical areas¹⁷ in which those measures will be needed to implement the plan. This description should be detailed enough to guide needed implementation activities throughout the watershed and can be greatly enhanced by developing an accompanying map with priority areas and practices. Thought should also be given to the possible use of measures that protect important habitats (e.g. wetlands, vegetated buffers, and forest corridors) and other non-polluting areas of the watershed. In this way, waterbodies would not continue to degrade in some areas of the watershed while other parts are being restored.

Element d. Estimate of the amounts of technical and financial assistance needed, associated costs, and/or the sources and authorities that will be relied upon to implement this plan.

What does this mean?

You should estimate the financial and technical assistance needed to implement the entire plan. This includes implementation and long-term operation and maintenance of management measures, information/education (I/E) activities, monitoring, and evaluation activities. You should also document which relevant authorities might play a role in implementing the plan. Plan sponsors should consider the use of federal, state, local, and private funds or resources that might be available to assist in implementing the plan. Shortfalls between needs and available resources should be identified and addressed in the plan.

Element e. An information and education component used to enhance public understanding of the plan and encourage their early and continued participation in selecting, designing, and implementing the nonpoint source management measures that will be implemented.

What does this mean?

The plan should include an I/E component that identifies the education and outreach activities or actions that will be used to implement the plan. These I/E activities may support the adoption and long-term operation and maintenance of management practices and support stakeholder involvement efforts.

Element f. Schedule for implementing the nonpoint source management measures identified in this plan that is reasonably expeditious.

What does this mean?

You should include a schedule for implementing the management measures outlined in your watershed plan. The schedule should reflect the milestones you develop in *g* and you should

¹⁷ Critical areas are those producing disproportionately high pollutant loads.

begin implementation as soon as possible. Conducting baseline monitoring and outreach for implementing water quality projects are examples of activities that can start right away. It is important that schedules not be “shelved” for lack of funds or program authorities; instead they should identify steps towards obtaining needed funds as feasible.

Element g. A description of interim measurable milestones for determining whether nonpoint source management measures or other control actions are being implemented.

What does this mean?

The WBP should include interim, measurable implementation milestones to measure progress in implementing the management measures. These milestones will be used to track implementation of the management measures, such as whether they are being implemented according to the schedule outlined in element *f*, whereas element *h* (see below) will develop criteria to measure the effectiveness of the management measures by, for example, documenting improvements in water quality. For example, a watershed plan may include milestones for a problem pesticide found at high levels in a stream. An initial milestone may be a 30% reduction in measured stream concentrations of that pesticide after 5 years and 50 percent of the users in the watershed have implemented Integrated Pest Management (IPM). The next milestone could be a 40% reduction after 7 years, when 80% of pesticide users are using IPM. The final goal, which achieves the water quality standard for that stream, may require a 50% reduction in 10 years. Having these waypoints lets the watershed managers know if they are on track to meet their goals, or if they need to re-evaluate treatment levels or timelines.

Element h. A set of criteria that can be used to determine whether loading reductions are being achieved over time and substantial progress is being made toward attaining water quality standards.

What does this mean?

As projects are implemented in the watershed, you will need water quality benchmarks to track progress towards attaining water quality standards. The *criteria* in element *h* (not to be confused with *water quality criteria* in state regulations) are the benchmarks or waypoints to measure against through monitoring. These interim targets can be direct measurements (e.g., fecal coliform concentrations, nutrient loads) or indirect indicators of load reduction (e.g., number of beach closings). These criteria should reflect the time it takes to implement pollution control measures, as well as the time needed for water quality indicators to respond, including lag times (e.g., water quality response as it is influenced by ground water sources that move slowly or the extra time it takes for sediment bound pollutants to break down, degrade or otherwise be isolated from the water column). Appendix B of these guidelines, “Measures and Indicators of Progress and Success,” although intended as measures for program success, may provide some examples that may be useful. You should also indicate how you will determine whether the WBP needs to be revised if interim targets are not met. These revisions could involve changing management practices, updating the loading analyses, and reassessing the time it takes for pollution concentrations to respond to treatment.

Element i. A monitoring component to evaluate the effectiveness of the implementation efforts over time, measured against the criteria established under element h.

What does this mean?

The WBP should include a monitoring component to determine whether progress is being made toward attaining or maintaining the applicable water quality standards for the waterbody(ies) addressed in the plan. The monitoring program should be fully integrated with the established schedule and interim milestone criteria identified above. The monitoring component should be designed to assess progress in achieving loading reductions and meeting water quality standards. Watershed-scale monitoring can be used to measure the effects of multiple programs, projects, and trends over time. Instream monitoring does not have to be conducted for individual BMPs unless that type of monitoring is particularly relevant to the project.

For more detailed information on developing watershed-based plans, please see *A Handbook for Developing Watershed Plans to Restore and Protect Our Waters*, U.S. EPA, EPA 841-B-08-002 March 2008, (water.epa.gov/polwaste/nps/handbook_index.cfm). Other resources for watershed planning are available on the Watershed Central website - including the Watershed Central Wiki and Plan Builder tool at (water.epa.gov/type/watersheds/datait/watershedcentral/index.cfm).