

ATTACHMENT A

Nine Elements of a Watershed Protection Plan

To ensure that Section 319 projects make progress towards restoring waters impaired by nonpoint source pollution, watershed protection plans that are developed or implemented with Section 319 funds to address Section 303(d)-listed waters must include at least the nine elements listed below. Where the watershed protection plan is designed to implement a TMDL, these elements will provide reasonable assurance that the nonpoint source load allocations identified in the NPS TMDL or anticipated in National Pollutant Discharge Elimination System (NPDES) permits for the watershed will be achieved. However, even if a NPS TMDL has not yet been completed, the nine elements are critical to assure that public funds to address impaired waters are used effectively.

1. An identification of the causes and sources or groups of similar sources that will need to be controlled to achieve the load reductions estimated in this watershed protection plan (and to achieve any other watershed goals identified in the plan), as discussed in item (2) immediately below. Sources that need to be controlled should be identified at the significant subcategory level with estimates of the extent to which they are present in the watershed (e.g., X numbers 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).
2. An estimate of the load reductions expected for the management measures described under paragraph (3) below (recognizing the natural variability and the difficulty in precisely predicting the performance of management measures over time). Estimates should be provided at the same level as in item (1) above (e.g., the total load reduction expected for dairy cattle feedlots; row crops; or eroded streambanks).
3. A description of the NPS management measures that will need to be implemented to achieve the load reductions estimated under paragraph (2) above (as well as to achieve other watershed goals identified in this watershed-based plan), and an identification (using a map or a description) of the critical areas in which those measures will be needed to implement this plan.
4. An 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 the plan. Sources of funding may include CWA Section 319, State Revolving Funds, USDA's Environmental Quality Incentives Program and Conservation Reserve Program, and other relevant Federal, State, local and private funds that may be available to assist in implementing the plan.

5. An information/education component that will be used to enhance public understanding of the project and encourage their early and continued participation in selecting, designing, and implementing the NPS management measures that will be implemented.

6. A schedule for implementing the NPS management measures identified in this plan that is reasonably expeditious.

7. Descriptions of interim, measurable milestones for determining whether NPS management measures or other control actions are being implemented.

8. A set of criteria that can be used to determine whether pollutant loading reductions are being achieved over time and substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether the watershed protection plan needs to be revised or, if a NPS TMDL has been established, whether the NPS TMDL needs to be revised.

9. A monitoring component to evaluate the effectiveness of the implementation efforts over time, measured against the criteria established under item (8) immediately above.

The difficulty in acquiring or developing some of the information needed to address the nine elements in a basin-wide plan with precision is recognized. However, it is critical that, at the *subwatershed* level, reasonable efforts are made to: a.) identify significant sources; b.) identify the management measures that will most effectively address those sources; and c.) broadly estimate the expected load reductions that will result. This information will provide focus and direction to plan implementation, and will help to assure that the plan can efficiently and effectively address the nonpoint sources of water quality impairments.

It is acknowledged that even after taking reasonable steps to obtain and analyze relevant data, the available information may be limited (within reasonable time and cost constraints); preliminary information and estimates may need to be modified over time (accompanied by mid-course corrections in the plan); and it often will require a number of years of effective implementation for a project to achieve its goals. Therefore, watershed protection plans should be implemented in a dynamic and iterative manner. Plans that address each of the nine elements above should proceed with implementation even though some of the information in the plan is imperfect and may need to be modified over time as information improves.

Subwatershed based plans must address a large enough geographic area so that its implementation will solve the water quality problems for the watershed. While there is no rigorous definition or delineation for this concept, the general intent is to avoid single segments or other narrowly defined areas that do not provide an opportunity for addressing a watershed's stressors in a rational and economic manner. Once a watershed plan meeting the nine items listed above has been established, stakeholders may choose to implement it in portions (e.g., based on particular segments, other geographic subdivisions, or NPS categories in the watershed), consistent with the schedule established pursuant to item (6) above.

River basin plans may be developed in varying levels of scale, scope, and specificity and may contribute significantly to the process of developing and implementing smaller scale watershed plans. River basin plans should be used as building blocks for developing and implementing local watershed-specific plans. Basin-wide plans will generally need to be refined for smaller scale watersheds to provide the information needs for the nine items identified above.

The above derived from, "*Supplemental Guidelines for the Award of Section 319 Nonpoint Source Grants to States and Territories in FY 2003.*"
<http://www.epa.gov/owow/nps/Section319/319guide03.html>