Chapter 3 – NPS Categories

Section 319(a)(1)(B) of the 1987 CWA requires each state to identify the categories and subcategories of nonpoint sources that contribute pollutants in amounts such that water quality standards are not met. Colorado's original NPS assessment report identified the following major categories of nonpoint sources: Agriculture; Silviculture; Construction Runoff; Urban Runoff; Resource Extraction; Land Disposal; Hydrologic Modification and Other.

Several categories were combined in the original NPS plan, as many of the most appropriate management measures (best management practices) to control pollutants were similar between categories. In the 2012 NPS plan update, another category is added, "Marinas and Boating". This section of the NPS plan describes the impact of each category on Colorado's waters, the NPS program strategy to address each category and the main areas of focus for the next five years.

Section 319 also requires states to identify the BMPs and measures that may be used to reduce pollutant loadings for each nonpoint category of pollutant sources. Implementation of BMPs to correct nonpoint source water quality problems, where such BMPs are identified solely as part of the state NPS program, is voluntary in Colorado.

3.1 Implementing the NPS Categories

3.1.1 Abandoned Mine Drainage (Acid Mine Drainage issues in Colorado)

Although the original 1989 NPS program assessment identified the category of resource extraction in general, the issues have been refined to address mainly the historic and inactive mine sites in Colorado[3]. The majority of adverse impacts from mining occur in historic mining districts within the mineral belt of Colorado, which extends from Boulder south and southwest to Silverton. These areas have significant reserves of metals such as gold, silver, lead, zinc and copper and these same areas typically have high concentrations of materials such as sulfur, arsenic and other elements that can contribute to the release of heavy metals.

The legacy of hard rock mining is obvious in many Colorado streams. Heavy metals leach from mine waste piles or drain from old mine tunnels and adits. A statewide inventory of abandoned mines estimates that over 23,000 abandoned mines exist in Colorado. Approximately 400 of these mines are adversely impacting, or have the potential to impact rivers and streams. Sediment related to past mining and milling activities also contributes to the contamination of the state's waters. Many stream segments on the state 303(d) list are impaired by heavy metals from inactive and legacy mines. Pollutant metals include zinc, cadmium, manganese, iron, and lead.

Mine reclamation projects must be prioritized in a local watershed plan. Source controls show promise in dealing with acid mine drainage and also may be eligible for funding. Source control eliminates the creation of polluted mine drainage by intercepting and diverting clean water away from contact with heavily mineralized zones. Inactive mine land reclamation projects that are designed to restore water quality are eligible for Section 319 funding except where funds are used to implement specific requirements in a draft or final discharge permit. NPS funds may not be used to build treatment systems required by a discharge permit for an inactive mine, but they may be used to fund a variety of other remediation activities at the same mine. Examples of activities that are eligible for funding include:

- Mapping and planning remediation at inactive mine land sites.
- Monitoring needed to design and evaluate the effectiveness of implementation strategies.
- Technical assistance to State and local abandoned mine land programs.
- Information and education programs.
- Technology transfer and training.

3 - For NPS program purposes, an inactive mine is one that has not operated since the passage of the 1972 Clean Water Act.

- Development and implementation of policies to address inactive mine lands.
- Moving, consolidating, capping and re-vegetating tailings piles, and diverting clean water around waste piles

3.1.2 Agriculture

Agriculture accounts for the majority of private land use in Colorado. Colorado has 32 million acres of land in farms, with the average farm size of approximately 1,000 acres. Cropland acreage totals 11.5 million with three million of these acres under irrigation. Agricultural activities that can contribute to nonpoint sources of pollution include animal feeding operations, rangeland production and grazing, soil tillage, weed and pest management, irrigation and soil nutrient management. The major agricultural NPS pollutants are increased sediment, pesticides, nitrate and phosphate, animal wastes, bacteria, dissolution of metals (e.g. selenium), and total dissolved solids. Agriculture activities can contribute to several nonpoint sources of pollution:

a) Agricultural activities can damage habitat and stream channels. Surface disturbance with loss of natural vegetative cover associated with overgrazing or location of cropland fields can increase the upland, riparian, and stream channel erosion. This can lead to excessive sediment loads, loss of aquatic life habitat, higher water temperature, lower dissolved oxygen and general degradation of water quality and habitat.

b) Colorado urban growth projections continue to show increases for the next twenty years. As urban growth increases, naturally there is a decrease on agricultural acreage and forestlands. These projections also indicate an increased urban need for water posing a further impact on agriculture, especially irrigated agricultural production. Change in water quantity management can lead to severe water quality impacts such as temperature, habitat degradation, aquatic life impacts and other impairments.

c) The IR has routinely identified stream segments impaired due to selenium. Many areas in Colorado have soils that naturally contain elevated levels of selenium. Many agriculture irrigation practices can increase the leaching of selenium from these soils, contributing to selenium loading to surface waters.

d) The presence of livestock manure and process wastewater does not denote pollution, but may, when improperly stored, transported or disposed of, create adverse impacts upon public health and the environment. Animal feeding operations not included in the concentrated animal feeding operations category are encouraged to take measures to protect surface water, groundwater and soil resources, through proper application of "best management practices" based upon existing physical conditions and constraints at the facility site.

e) Phosphorus and nitrogen are used commonly in agriculture and can pose a threat to water quality. Over-application of fertilizers and animal waste to cropland can lead to runoff and/or leaching problems. Increased nitrate levels in groundwater as drinking water sources pose health concerns. Nutrient-enriched surface runoff may stimulate the growth of algae or nuisance weeds in lakes and reservoirs. Impairments due to pH and bacteria can also result from agricultural activities.

f) Another pollutant often associated with agriculture is excessive sediment. This pollutant occurs naturally due to erodible soils and an arid climate but human activities can greatly increase the rate of erosion and lead to siltation of streambeds, as well as lakes and reservoirs. Siltation can lead to loss of aquatic habitat in both streams and standing water bodies.

The NPS program will continue to support the following activities related to the Agriculture category:

- Implement selenium management efforts (including related salinity reduction practices) to reduce loading in the Arkansas, Gunnison, Colorado and South Platte watersheds.
- Support animal agriculture in managing adverse animal impacts to water quality.
- Reduce sediment loads that impair surface waters or pose a significant threat to public drinking water supplies, e.g. wildfire burn area rehabilitation.

- Prevent impairment of ground and surface water due to nonpoint source contamination by agricultural chemicals.
- Partner with organizations and agencies to promote the inclusion of water quality management in their programs; support technology transfer and implementation related activities through grant and technical assistance.

3.1.3 Forestry / Silviculture

Colorado has approximately 22.6 million acres of forestland, with nearly 68 percent in federal management. An estimated 200,000 private landowners control 28 percent of the state's forest; the remaining forest is managed by other units of government or other non-federal entities.

Silvicultural activities can impact the flow and sediment delivery process through the removal of forest canopy and road construction. Wild fires can have similar impacts with the addition of greater landslide potential. Forestry activities that impact water quality including removal of streamside vegetation, road construction and use, timber harvesting, and mechanical preparation for the planting of trees contribute to the transport of sediment and other pollutants to adjacent surface water. Road construction and road use are significant sources of NPS impacts, often causing the majority of the total sediment impacts associated to forestry operations. Additional concerns include soil disturbance, compaction, loss of riparian areas and disrupted stream channels. Loss of trees can cause loss of sufficient shade for forestland waterbodies resulting in harmful impacts to aquatic life.

Various environmental conditions in the last decade including drought and mountain pine beetle infestation have increased the potential for wildfires. Colorado forested lands are also experiencing severe impacts from continuing population increases. Increased development and associated road and structure construction increases the risk of wildfire. Colorado experienced the most intense wildfire season in its history in 2002 with 3,072 wildfires burning over 600,000 acres. The resulting loss of vegetation, soil erosion and loss of habitat was severe, impacting many water resources.

Since 1996, the mountain pine beetle killed 1.5 million acres of lodgepole pine in Colorado alone. In 2007 the beetle infestation killed an estimated 3.9 million acres of lodgepole pine across the entire Rocky Mountain region. The extent of beetle kill has raised concerns about the risk of catastrophic fires.

Management of the forest stands, including use of controlled wildfires, has been identified as one method of promoting the health of the forest ecosystem. Effective management responses to severe forest impacts are also vital to returning a forest to a healthy equilibrium and protecting the associated water bodies.

The NPS program will continue to support the following activities related to the Forestry / Silviculture category:

- Reduce sediment loads that impair surface waters or pose a significant threat to public drinking water supplies, e.g. wildfire burn area rehabilitation.
- Prevent impairment of ground and surface water due to nonpoint source contamination.
- Partner with organizations and agencies to promote the inclusion of water quality management in their programs
- Support technology transfer and implementation related activities through grants and technical assistance.

3.1.4 Hydromodification and Habitat Alteration

Hydromodification activities include channelization and channel modification, dams, and streambank and shoreline erosion. A frequent result of channelization and channel modification activities is a diminished suitability of instream and streamside habitat for fish and wildlife. Another result is altered instream patterns of water temperature and sediment type, as well as the rates and paths of sediment erosion, transport and deposition. Hardening of banks along waterways increases the movement of nonpoint source pollutants from the upper reaches of watersheds into lower reaches, including reservoirs.

The erosion of shorelines and streambanks can be a natural process that can produce beneficial or adverse impacts on riparian habitat. Excessively high sediment loads can smother submerged aquatic vegetation, impact spawning areas, fill in riffle pools, and contribute to increased levels of turbidity and nutrients. Although accomplishments have been made in improving water quality through various environmental programs and outreach, Colorado's streams and rivers are still being impacted from current and past land use. An ongoing water quality issue related to current hydrologic modification in Colorado is the impact of increased or decreased flows in a natural stream channel

Properly functioning stream and riparian areas are critical in maintaining water quality, water quantity, riparian habitat, fish populations and species diversity, downstream beneficial uses, and the social and economic viability of Colorado. For the purposes of the NPS program, stream restoration/rehabilitation can be defined as the measurable improvement of stream and riparian ecosystem processes. Following restoration and rehabilitation activities, streams must be able to convey the sediment and flow produced by the upstream watershed to attain the designated uses without excessive aggradations or degradation of bed and banks.

The NPS program is very active supporting stream restoration and habitat integrity protection; it will continue to actively fund protection and restoration activities related to the protection of aquatic life and its habitat. Appendix D contains a technical document addressing the Colorado approach to stream restoration.

3.1.5 Urban Areas

Colorado faces significant challenges due to pressures of increasing population trends. Colorado population was estimated to be 5.1 million in 2010. The Front Range urban corridor contains the greatest proportion of Colorado's population. However, there are areas in the state with one or fewer persons per square mile. Between the years 2008 and 2050, the state of Colorado is projected to grow from approximately 5.1 million people to 9.1 million people, an increase of 78% (Colorado Water Conservation Board CWCB 2010).

Urbanization increases the variety, timing, and amount of pollutants carried into receiving waters. Urban, suburban, and other densely developed areas typically have land surfaces covered by buildings, pavement and compacted landscapes. These surfaces limit the infiltration of rain and snowmelt greatly increasing the volume and velocity of stormwater runoff.

Pollutants from urban runoff can include: sediment; oil, grease and chemicals from motor vehicles; pesticides and nutrients from lawns and gardens; viruses, bacteria and nutrients from pet waste and failing septic systems; road salts; heavy metals from roof shingles; motor vehicles and other sources; and thermal pollution from dark impervious surfaces such as streets and rooftops.

Stormwater management is regulated under CWA provisions administered by the WQCD, Stormwater Permit Program. These regulations apply to storm water runoff once the water enters the streets in heavily populated urban areas (at least 50,000 people and density of 1,000 people per square mile).

To reduce negative impacts from storm water, the NPS program works with numerous agencies such as county flood control agencies, municipalities, the Stormwater Permit Program, and other watershed partners. The program can also:

- Support implementation of best management practices that control stormwater in areas not covered by a permit, such as small towns and rural areas
- Support development of urban watershed plans, irrespective of the regulatory framework
- Support outreach and education programs

3.1.6 Roads, Highways and Bridges

Runoff controls are essential to preventing polluted runoff from roads, highways and bridges from reaching surface waters. Erosion from roads, highways and bridges can contribute large amounts of sediment and silt to adjacent waterbodies, which can then deteriorate water quality, lead to fish kills, as well as other ecological

problems. Heavy metals, oils, other toxic substances and debris can be absorbed by soil and carried with runoff water to lakes, rivers and bays.

The Colorado Department of Transportation (CDOT) reports the state has a 9,144 mile highway system, including 3,429 bridges. Each year, this system handles over 28 billion vehicle miles of travel. Although the Interstate system accounts for only about 10 percent (913 miles) of the total mileage on the state system, 40 percent of all travel takes place on our Interstate highways.

To reduce negative impacts from runoff, the NPS program works with numerous agencies such as CDOT, counties, municipalities, the Stormwater Permit Program and other watershed partners. The program can also:

- Support implementation of best management practices that control runoff in areas not covered by a permit, such as small towns and rural areas
- Support development of watershed plans, irrespective of the regulatory framework
- Support outreach and education programs

3.1.7 Marinas and Boating

Marinas and recreational boating activities are very popular uses of lakes and reservoirs. The growth of recreational boating, as a result of growth of development in general, has led to a growing awareness of the need to protect the environmental quality of our waterways.

Individual boats and marinas usually release only small amounts of pollutants. Yet, when multiplied by thousands of boaters and marinas, they can cause distinct water quality problems in lakes, rivers, and coastal waters. The U.S. Environmental Protection Agency has identified the following potential environmental impacts from boating and marinas: high toxicity in the water; increased pollutant concentrations in aquatic organisms and sediments; increased erosion rates; increased nutrients, leading to an increase in algae and a decrease in oxygen (eutrophication); and high levels of pathogens. In addition, construction at marinas can lead to the physical destruction of sensitive ecosystems and bottom-dwelling aquatic communities.

Water pollution from boating and marinas is linked to several sources. They include poorly flushed waterways, boat maintenance, discharge of sewage from boats, storm water runoff from marina parking lots, and the physical alteration of shoreline, wetlands, and aquatic habitat during the construction and operation of marinas. When caring for boats, a significant amount of solvent, paint, oil, and other pollutants potentially can seep into the ground water or be washed directly into surface water. The chemicals and metals in antifouling paint can limit bottom growth. Many boat cleaners contain chlorine, ammonia, and phosphates -- substances that can harm plankton and fish. Small oil spills released from motors and refueling activities contain petroleum hydrocarbons that tend to attach to waterborne sediments. These persist in aquatic ecosystems and harm the bottom-dwelling organisms that are at the base of the marine food chain.

Zebra and Quagga mussels are non-indigenous species that have recently colonized Colorado reservoirs. The mussels pose a real threat for their bio-fouling capabilities by infiltrating water supply pipes of hydroelectric, public water supply plants and industrial facilities. The spread of mussels is strongly tied to boats moving from one lake to another.

The NPS program funds mainly outreach and education activities associated with the marinas and boating category, for the protection of lakes and reservoirs. This includes the development and dissemination of information related to best management practices or other messages, influences or communications focused on water pollution prevention and reduction in the marina and boating community. The goal is for marinas to adopt clean practices for their operations and delivering this message to their boating customers.

3.1.8 Other Nonpoint Source areas of concern:

3.1.8.1 Wildfire and other catastrophic events

Colorado's landscape changed significantly in 2002 with a massive wildfire season. More than 379,287 acres burned in Colorado; an estimated 6.9 million acres burned in the western states. It was Colorado's most extensive wildfire season in recorded history. Colorado's NPS program responded in two ways. First, part of the 2002 grant was reallocated immediately from selected projects to burn area restoration activities in watersheds where additional work was needed to protect public drinking water supplies and systems. More than $700,000 was allocated to protect water supplies in Douglas County and La Plata County.

Pending availability of funds, the NPS program may set aside annually, a "rapid response" fund, which will allow the program to respond to catastrophic events more quickly than through the regular grant cycle. The funds can be used first to remediate catastrophic events that create conditions considered to be an imminent threat to the public health. The Division and Commission may identify other uses of the funds. EPA requires specific project implementation plans for the use of the rapid response funds; the PIPs must be negotiated and approved by EPA prior to the release of the funds, in the same manner as the other NPS projects.

3.1.8.2 Drought and water quality

In a semi-arid environment, drought is a regular occurrence. Colorado's worst wildfire season coincided with a severe drought that has continued in varying degrees, depending on the part of Colorado in question. Drought reduces the available dilutional flows in streams, rivers, lakes and reservoirs, which may increase the concentration of various pollutants in those water bodies. Drought can also cause pollutants typical in storm water flows to build up on the ground surface, which then may increase the initial concentrations when precipitation finally does occur. In addition, prolonged drought reduces aquifer recharge, which increases aquifer drawdown. Well failure is possible if pumping continues in a depleted aquifer.

The impacts to the NPS Program are observed in project implementation, especially in those projects that involve irrigation and nutrient management, and those that involve revegetation. Project implementation may be delayed when precipitation and stream flows are reduced.

3.1.8.3 Stormwater Management

An objective of the urban and construction nonpoint source management is to link the efforts of the NPS program to those of the phase I and II municipalities or others working under Colorado Discharge Permit System stormwater permits. Linking these programs to the maximum extent practicable provides for more effectiveness since both deal with the problems of precipitation related (stormwater) pollution. Most water quality issues, including stormwater management, will benefit from watershed based solutions.

The following six objectives of the urban and construction NPS program parallel the six program elements of the stormwater permit:

1. Support public education efforts regarding the impacts of stormwater pollution on receiving water bodies and steps that can lessen or eliminate those problems.
2. Support public involvement efforts in watersheds that include urbanized areas.
3. Support a reduction of illicit discharges to urban waterways.
4. Support the control of construction site runoff from construction activities on a statewide basis.
5. Support the control of runoff from developed lands post construction activities.
6. Support efforts of entities to improve runoff quality from facilities and processes used in performing their work.

Permits for stormwater runoff from Municipal Separate Storm Sewer Systems require the six programs above to control the discharge of pollutants to the maximum extent practicable. In meeting permit requirements owners of municipal storm sewer systems have flexibility in defining the measurable goals for each of these six programs. While supportive of the stormwater program elements, NPS funds may be used only for stormwater management activities not specified in a stormwater permit, within the context of annual program and funding priorities.

3.1.8.4 Animal Feeding Operations

Colorado is a significant beef producing state, generally ranking fourth in the nation for the number of beef cattle on feed. There are approximately 13,300 farms in Colorado with cattle (2002 Census of Agriculture), including 981 with "cattle on feed". The vast majority of farms, nearly 10,000, carry fewer than 100 head of cattle. Slightly more than 41% of Colorado's cattle and calves are considered to be "on feed". An animal feeding operation (AFO) is defined by CDPHE WQCC Regulation No. 81, June 30, 2004 as a lot or facility (other than an aquatic animal production facility where:

- Animals (other than aquatic animals) have been, are, or will be stabled or confined and fed or maintained for a total of 45 days or more in any 12-month period, and
- Crops, vegetation, forage growth, or post-harvest residues are not sustained in the normal growing season over any portion of the lot or facility.

A concentrated animal feeding operation (CAFO) means a medium or large sized animal feeding operation AFO or that is designated by the WQCD as a CAFO, pursuant to Regulation 81, Section 81.4. CAFOs are determined by the number and type of animals stabled or confined on the facility, or if either of the following is met:

- Pollutants are discharged into surface waters of the state through a man-made drainage system; or
- Pollutants are discharged directly into surface waters of the state that originate outside of and pass over, across or through the facility or otherwise come into direct contact with the animals confined in the operation.

NPS interaction with AFOs is limited to those that fall outside CAFOs. The livestock feeding industry is active in providing their membership with both technical and financial assistance for those facilities not identified as CAFOs. Also, the off-site management of wastes that have been generated by a CAFO and then transported to an off-site facility that is not subject to discharge permit requirements is considered part of Colorado's NPS program.

NPS grant funding used to assist AFOs may only be used with those facilities that have and will implement a comprehensive nutrient management plan (CNMP). Aspects of a CNMP that are not directly related to water quality, for example dust or odor suppression, are not eligible for grant funding.

3.1.8.5 Onsite wastewater systems

Onsite wastewater systems, also known as septic systems or individual sewage disposal systems (ISDS) are used to treat and dispose of domestic wastes in relatively small volumes of wastewater, usually from houses and businesses that are not served by central wastewater treatment plants. The installation of septic systems normally is regulated at the local level, except that systems with a design capacity of 2,000 gallons or more per day must obtain site location approval and a discharge permit from the Division.

Septic systems generally are considered potential nonpoint sources. In Colorado, 33% of all homes are served by onsite wastewater systems, a trend that continues to grow. Millions of gallons of septic tank effluent percolate into the soils of the state annually. Ensuring compliance with wastewater treatment performance requirements that protect human health, surface waters, and groundwater resources is difficult due to the dispersed nature of septic systems. Proper placement, operation, and maintenance of onsite wastewater systems are critical to minimize potential pollutant problems.

Historically, the NPS program has not actively funding ISDS-related activities, as the majority is under the jurisdiction of local county health departments. As NPS program funding becomes more limited, the NPS program will continue to consider ISDS projects as a low priority.

3.2 Best Management Practices

Best management practices (BMPs) are both structural and nonstructural techniques that either prevent or reduce pollution from nonpoint sources. BMPs are defined as:

A practice or combination of practices, as determined by a responsible group after examination of alternative practices and appropriate public participation, to be the most effective, practicable means of preventing or reducing the amount of pollution generated by nonpoint sources to a level compatible with water/stream quality goals. They include, but are not limited to, structural and nonstructural controls and operation and maintenance procedures.

The recommendation of BMPs is complex, due to the interaction between various natural resources. The watershed as a whole must be considered, to determine true cause and effect for a nonpoint source concern and to identify the most appropriate BMP for the situation. Off-site impacts of BMP implementation must also be considered.

In addition, the selection of specific BMPs will require the involvement and coordination of many parties and interests. Prior to selecting BMPs, a decision must be made on the level of land management to be continued after treatment. Complex systems with high maintenance requirements, although they may be effective initially, will be useless if they are not maintained in the long term.

Selected BMPs may not control all nonpoint loading, but will be installed as necessary to reduce nonpoint loading to the desired level. Reasonableness of implementation costs must be considered with each proposed application of BMPs but cost will not be used as a sole determining factor to preclude BMPs in a particular location.

Appendix E – Colorado Nonpoint Source Program Best Management Practices Library contains a summary of several BMPs that the NPS program has identified as applicable to address NPS pollution in Colorado and the NPS BMP Table of approved BMPs for Colorado. The NPS program also recognizes a variety of technical references and guides that provide guidance in site-specific planning, design, implementation or construction, operation and maintenance of a practice or components of a practice. The following list is not all-inclusive, but provided for information.

- www.npscolorado.com/BMPs.html
- USDA Natural Resources Conservation Service Field Office Technical Guide
- U.S. Forest Service Watershed Conservation Practices Handbook and other technical references
- USDI Bureau of Land Management Technical References
- Colorado State University Cooperative Extension
- Urban Drainage and Flood Control District, Urban Storm Drainage Criteria manual: Volume 3
- Stream Corridor Restoration: Principles, Processes and Practices (The Federal Interagency Stream Restoration Working Group, 1998). See http://www.nrcs.usda.gov/technical/stream_restoration
- Colorado Timber Industry Association Silviculture BMPs
- Colorado Division of Minerals and Geology Best Practices in Abandoned Mine Land Reclamation.

The NPS program will, during the time frame of the management plan, compile and continue to develop a library of Colorado-related BMPs, using the template presented in Appendix E as an example. This library eventually will serve to catalogue many of the BMPs commonly used in Colorado and several associated pieces of information relating to each BMP. The objective of this library is to provide a single resource for NPS BMP planning and implementation.

Each BMP will be captured in a template containing the following information:

- **BMP Name** - The commonly used term that identifies the BMP
- **NPS Category** - The NPS pollution category that the BMP addresses
- **NPS Sub Category** - Further refinement of a sub type of pollution category that the BMP addresses
- **Purpose** - The narrative description of the BMP and a general overview of how the BMP affects load reduction of a particular pollutant.
- **Appropriate Stream Type** - They type of channel (often based of Rosgen Classification System http://www.epa.gov/owow/watershed/wacademy/acad2000/stream_class/) in which the BMP is suited or expected to perform at highest efficiency

- **Pollutants Addressed -** The pollutant(s) the BMP is expected to address
- **Load Reduction Potential -** Ranked as Low, Medium or High, this section intends to describe the potential for the BMP to reduce the loading for the pollutant addressed
- **Estimated Time for Reduction -** Ranked as immediate, months-2 years, greater than 2 years, this section intends to describe the time in which load reductions are expected to occur following the completion of the BMP
- **Expected Maintenance -** Ranked as Low, Medium or High, this section intends to describe the expected amount of maintenance required on the BMP.
- **Monitoring Strategy -** This section captures how the BMP will be evaluated and compared to pre project or other data sets.

This template will be included in assessment and implementation project plans and adopted consistently in every project that gathers, assesses and reports on data.