#### **JAWRA Draft**

This is the pre-peer reviewed version of the following article: DOI: 10.1111/1752-1688.12487, which has been published in final form at http://onlinelibrary.wiley.com/doi/10.1111/1752-1688.12487/abstract.



# Comparing Costs of Onsite Best Management Practices to Nutrient Credits for Stormwater Management: A Case Study in Virginia

Journal:	Journal of the American Water Resources Association
Manuscript ID	JAWRA-16-0010-P.R2
Manuscript Type:	Technical Paper
Date Submitted by the Author:	n/a
Complete List of Authors:	Nobles, Alicia; University of Virginia, Department of Civil and Environmental Engineering Goodall, Jonathan; University of Virginia, Department of Civil and Environmental Engineering Fitch, G.; Virginia Transportation Research Council
Key Terms:	storm water management < WATER RESOURCES MANAGEMENT, best management practices (BMP-s) < WATER RESOURCES MANAGEMENT, nutrients < WATER QUALITY, water resource economics < ECONOMICS

SCHOLARONE™ Manuscripts

1 Comparing Costs of Onsite Best Management Practices to Nutrient Credits for

**JAWRA Draft** 

- 2 Stormwater Management: A Case Study in Virginia
- 3 Alicia L. Nobles, Jonathan L. Goodall, and G. Michael Fitch
- 4 Graduate Research Assistant (Nobles) and Associate Professor (Goodall), Department of
- 5 Civil and Environmental Engineering, University of Virginia, 351 McCormick Road, PO
- 6 Box 400742, Charlottesville, Virginia 22904; Associate Principal Research Scientist
- 7 (Fitch), Virginia Transportation Research Council, Charlottesville, Virginia 22903 (E-
- 8 Mail/Goodall: goodall@virginia.edu).
- 9 ABSTRACT: Best Management Practices (BMPs) are widely used to mitigate impacts of
- increased impervious surfaces on stormwater runoff. However, there is limited detailed
- and up-to-date information available on the cost of designing, constructing, and
- maintaining BMPs over their lifetime. The objective of this study is to analyze BMPs
- recently constructed by the Virginia Department of Transportation (VDOT) to quantify
- their total cost per pound of phosphorus removed annually. A motivating factor for the
- study is recent changes to regulatory guidelines in Virginia that allow for full or partial
- 16 substitution of purchased nutrient credits in lieu of constructing onsite BMPs to achieve
- 17 compliance with stormwater quality regulations. Results of the analysis of nine BMPs
- found that their cost ranged from \$20,100 to \$74,900, in 2014 dollars, per pound
- 19 (\$44,313 to \$165,126 per kilogram) of phosphorus removed. Based on these results and
- assuming current credit prices procured by VDOT, purchasing nutrient credits is a cost
- effective option for the agency, especially when factoring in the cost of additional right-
- of-way for the BMP. Based on this finding, we expect compliance with stormwater
- 23 quality regulations through credit purchases to become more widely used in Virginia.
- 24 Moving forward, we suggest more direct tracking of BMP costs to support comparisons
- between BMP costs across a range of types and conditions to credit purchases for
- 26 meeting stormwater regulations.
- 27 KEY TERMS: storm water management, best management practices, nutrients, water
- 28 resource economics, stormwater control measures costs, nutrient credits, transportation
- 29 projects

# INTRODUCTION

Impervious surfaces including streets and roads increase direct runoff from
precipitation events and this increased runoff can have negative effects including
flooding, erosion of banks and stream beds, and increased pollutant loading to
waterbodies (Arnold and Gibbons, 1996). Regulatory requirements for management of
stormwater quality (e.g., removing urban pollutants) and quantity (e.g., reducing pulses
and volumes) are established by state and local governments including the
Commonwealth of Virginia, the focus area of this study, to mitigate degradation of
surface waters due to increased impervious surfaces and general construction activities.
These requirements apply both during the construction stage, when using temporary
stormwater management measures, and the post-construction stage, when using long-
term stormwater management measures (U.S. Environmental Protection Agency
(USEPA), 1999; Virginia Department of Conservation and Recreation (VADCR), 2011).
Traditionally, long-term stormwater management measures have focused on Best
Management Practices (BMPs), also known as stormwater control measures, that are
constructed onsite with the capacity to temporarily hold and treat stormwater runoff
(Thurston, 2012). The Virginia Department of Transportation (VDOT) constructed over
1,300 BMPs for long-term management of stormwater for roadway development projects
from 1977 to 2014. The majority of these BMPs were extended detention basins (91.9%
of the total number of BMPs) but also include manufactured BMPs (3.8%), enhanced
extended detention basins (1.8%), retention basins (1.4%), grass swales (0.4%),
bioretention filters (0.4%), bioretention basins (0.2%), an infiltration basin (<0.1%), and
a sand filter ( $<0.1\%$ ).

These BMPs represent a significant cost to taxpayers, however the exact cost is
difficult to quantify. There has been past research on determining the lifetime cost of
BMPs, largely looking at the expense for state DOTs. Weiss et al. (2011, 2007)
summarized this past research into confidence intervals of BMP costs that include results
from a variety of sources (American Society of Civil Engineering (ASCE), 2014; Brown
and Schueler, 1997; California Department of Transportation (Caltrans), 2004;
Southeastern Wisconsin Regional Planning Commission (SWRPC), 1991). These
estimates were generated through a variety of means, but most often they were obtained
through surveys rather than actual construction data. Caltrans (2004) is an exception in
that the department did include cost data for actual constructed BMPs, but these were for
retrofit projects, which are known to be more expensive (Abbasi and Koskelo, 2013).
Our study contributes needed information on actual costs of constructed BMPs
obtained through detailed analysis of construction plans and databases maintained by
VDOT. For VDOT and other DOTs in the US, BMP costs are typically not tracked
separately of other project costs (Abbasi and Koskelo, 2013). For VDOT, we found that
cost details are available in project documents, but one must go through a process of
separating stormwater management related costs from other project construction costs in
order to determine the total cost of stormwater infrastructure for a given project.
Furthermore, the required data is spread across different databases maintained by the
agency, requiring further work to track and compile actual cost data. We completed this
tedious process and compare our cost estimates to the BMP cost confidence intervals

One important motivation for accurately quantifying BMP cost is recent
regulatory changes in Virginia that allow for compliance with post-construction
stormwater quality regulations to be achieved through the purchase of nutrient credits
(VADCR, 2011). While past regulatory guidelines required stormwater quality to be
managed using onsite measures, there are now options in Virginia for achieving
compliance with stormwater quality regulations through substituting nutrient credits.
Banks are being established by third party organizations and offer nutrient credits for
purchase to organizations like VDOT. For VDOT, purchasing nutrient credits to comply
with the required post-construction stormwater quality regulations in lieu of constructing
onsite BMPs may offer a more cost-effective means of achieving stormwater compliance
However, with limited data on BMP costs, it is difficult to decide between purchasing
credits and constructing onsite BMPs.
To address this research need, we used data from actual BMPs constructed by
VDOT to separate out and estimate their total lifetime costs. We determined a lifetime
(assumed to be 20 years) cost for the BMPs by taking into account pre-construction costs
purchases of right of way (ROW), construction costs, and routine operations and
maintenance (O&M) costs. We limited our study to BMPs that were constructed within
10 years from the start of this study and for stormwater quality regulations only (i.e., the
BMP would not have been required if considering only stormwater quantity regulations)
so that we could estimate cost effectiveness in terms of the cost to remove a pound of
phosphorus annually, the nutrient targeted in stormwater regulations for the region where
the BMPs were constructed. These cost effectiveness values allowed us to compare our

- 1 BMP costs to current prices procured by VDOT for purchasing nutrient credits from 2 third-party banks.
  - Background on Nutrient Credits in Virginia

Nutrient credits, defined as the annual calendar year reduction in nutrients beyond the established regulatory baselines (Va Code Ann., 2015), are generated through BMP enhancements or land conversion. For example, the majority of the currently available nutrient credits were generated from conversion of agricultural land to forested land for perpetuity (VADEQ, 2016). Nutrient credits, as well as stormwater quality regulations (i.e., required nutrient reductions), are expressed in pounds of phosphorus removed annually because the Virginia Department of Environmental Quality (VA DEQ) considers phosphorus a "keystone" pollutant exhibiting some characteristics of both particulate and soluble pollutants, making it an indicator of urban pollutants in general (VADCR, 2011). Nutrient credits are managed through third-party banks and banks are required to document the associated ratio of nitrogen (Va Code Ann., 2015).

Full or partial substitution of nutrient credits may be used to achieve compliance with post-construction stormwater quality regulations provided that the site is in compliance with stormwater quantity regulations and substitution of credits does not violate, if in place, more stringent local stormwater management ordinances to prevent further degradation of localized areas of impaired water quality or water resources.

Nutrient credits are perpetual (i.e., credits are purchased once and last a lifetime), substituted at a 1:1 ratio (i.e., one pound of required post-construction stormwater

- pollutant reduction is equivalent to one pound of nutrient credit), and are available in fractional increments (Va Code Ann., 2015).
- Nutrient credits may be substituted to achieve compliance with stormwater quality regulations under the following three scenarios: (1) less than 5 acres (20,234 m<sup>2</sup>) of land are disturbed; (2) the post-construction phosphorus removal requirement is less than 10 pounds (4.5 kg) per year; or (3) at least 75% of the required post-construction phosphorus removal can be achieved using onsite BMPs, but full compliance with stormwater quality regulations cannot practicably be met onsite. In order for nutrient credits to be eligible for substitution, credits must be generated within the same or adjacent 8-digit U.S. Geological Survey (USGS) hydrologic unit code (HUC). If no nutrient credits are available in the same or adjacent 8-digit USGS HUC, a credit generated in the same tributary (i.e., river basin) may be considered for eligibility by the VA DEQ, however, credits generated in a tributary outside of the site are ineligible (Va Code Ann., 2015). This study focuses on sites that fall under scenario 2 where 100% of the stormwater quality regulations (i.e., required nutrient reduction) can be substituted with credits. These sites are in compliance with stormwater quantity regulations and, therefore, the constructed BMPs are only used to achieve compliance with stormwater quality

## MATERIALS AND METHODS

20 Data

regulations.

A database of over 1,300 stormwater BMPs constructed in Virginia from 1977 to 22 2014 was provided by VDOT. The database included details for each BMP such as type,

1	date installed, location (coordinates and Virginia Department of Conservation and
2	Recreation 6 <sup>th</sup> order HUCs), and treatment purpose (stormwater quality or quantity). The
3	BMP coordinates were mapped in a geographic information system (GIS) and the
4	location was compared to the VA DCR 6 <sup>th</sup> order HUC listed in the database and 12-digit
5	(6th order) HUC boundaries obtained from the USGS (USGS, 2014) to ensure accuracy
6	of the BMP location. In addition to the BMP database, VDOT also provided construction
7	site plans, a database of construction materials with associated costs (including labor),
8	and ROW parcel sizes with associated land costs pertaining to these projects.
9	Due to the difficulty in obtaining, analyzing, and deciphering available data to
10	determine BMP costs, we limited our study to include nine BMPs built across three
11	different projects to achieve compliance with stormwater quality regulations (see Figure
12	1 for project locations and Table 1 for the BMP properties). Project Number (PN) 0095-
13	016-111 C501 was completed in 2008 in Caroline County and focused on relocating
14	Route 652. The project included construction of three extended detention basins (BMP
15	IDs 1-3 in Table 1). PN 0066-076-113 C501 was completed in 2006 and focused on
16	improving I-66 by widening approximately 3.3 miles of high-occupancy-vehicle lanes in
17	Prince William County. The project included construction of four extended detention
18	basins in 2006 (BMP IDs 4-7 in Table 1). PN 0066-076-113 C506 focused on
19	reconstruction of an interchange for I-66 in Prince William County. The project included
20	construction of an enhanced extended detention basin in 2004 and sand filter in 2005
21	(BMP IDs 8 and 9 in Table 1).
22	The selected BMPs were constructed from 2004 to 2006 and include different

BMP types and sizes reflective of VDOT's previous stormwater quality management

1	practices. Seven of the nine BMPs (BMPs 1-7) were extended detention basins which are
2	the most dominant BMP used in the past by VDOT for management of stormwater
3	quality (92% [N=1202] of BMPs). The two other BMPs, an enhanced extended detention
4	basin and sand filter (BMPs 8 and 9), were constructed much less frequently (N=24 and
5	N=1, respectively) and selected for comparison based on availability of information in
6	four separate databases maintained by VDOT (i.e., BMP details, construction site plans,
7	construction material costs, and ROW parcel sizes). For eight of the nine BMPs analyzed,
8	credits could have been purchased under scenario 2, that is substitution of nutrient credits
9	to comply with 100% of the stormwater quality regulations. This is because the BMP's
10	post-construction phosphorus reduction requirement was less than 10 pounds (4.5 kg) per
11	year (Va. Code Ann., 2015). One of the BMPs analyzed, BMP 7, would not have
12	qualified for a 100% substitution under current regulations due to the fact its post-
13	construction phosphorus control requirement exceeded 10 pounds (4.5 kg) per year. It
14	would have, however, qualified under scenario 3 for 25% of its required phosphorus
15	reduction to be met offsite provided that 75% reduction could be achieved through onsite
16	controls. To simplify the comparison of BMP costs to nutrient credit prices, we excluded
17	BMP 7 from this portion of the analysis so that only BMPs that qualify for 100%
18	substitution are included in the nutrient credit price comparison.

# **Cost Estimates**

Components of a BMP total cost can include pre-construction, construction, ROW, routine annual O&M, non-routine O&M, and demolition and disposal at the end of the BMP's useful life (Arika et al., 2006; Sample et al., 2003). In this study we limited

- 1 BMP cost to include only pre-construction, construction, ROW, and routine annual
- 2 O&M. Non-routine O&M and end-of-life costs were assumed to be insignificant relative
- 3 to the other costs.

- Pre-Construction Costs
- Pre-construction costs include design, permitting, planning, and contingency costs. These costs have been estimated to range between 10% and 40% as the ratio of pre-construction costs to construction costs (King and Hagan, 2011) with two studies suggesting 32% (Arika et al., 2006; Brown and Schueler, 1997) and another study suggesting a ratio of 25% (Wiegand et al., 1986). Based on these prior studies and given that pre-construction costs were not available for the BMPs analyzed in this study, pre-

construction costs were assumed to be 32% of construction costs.

#### Construction Costs

Construction costs for stormwater management are not readily available or tracked on their own by VDOT. It was possible, however, to estimate construction costs by manually reviewing archived construction plans for each of the nine BMPs. VDOT maintains a database that includes past construction plans. Within this database, we identified a stormwater control plan for the three construction projects analyzed in this study. This stormwater control plan listed in detail the materials required for the construction of each BMP for the project. The construction plan database included materials, but did not include cost information. To obtain cost information we used a second database maintained by VDOT with unit cost information. The materials listed in

- 1 the stormwater control plan were linked via an item number to unit costs (including
- 2 labor) stored in the other database.
- 3 Right of Way (ROW) Costs
- 4 ROW costs can be a significant contributor to the cost of a BMP, especially in
- 5 urbanized areas (King and Hagan, 2011; NCHRP, 2012; Weiss et al., 2011). Because of
- 6 the variability in the land area requirements for each BMP and the cost of land, ROW
- 7 costs for BMPs are difficult to estimate (Weiss et al., 2011). In this study, the minimum
- 8 required ROW for each BMP was determined by measuring the BMP footprint provided
- 9 by construction site plans. Using the parcel size and associated cost provided by VDOT,
- the ROW cost for each BMP was determined by multiplying the parcel cost by the
- percentage of the parcel size that the BMP footprint occupied.
- 12 Annual Operations and Maintenance (O&M) Cost
- Annual operations and maintenance (O&M) costs were assumed to be 1%, 4.5%,
- and 12% of the construction cost for extended detention basins, the enhanced extended
- detention basin, and the sand filter, respectively. These values were based on the average
- values provided by the USEPA (USEPA, 1999). Annual O&M costs for a 20-year
- 17 lifetime were discounted at a rate of 3% to determine the present value of O&M at the
- 18 time of construction. The discount rate was selected based on the U.S. Office of
- 19 Management and Budget's reported 10-year real discount rate of 2.5% and 30-year real
- discount rate of 3.2% as recommended by the Federal Highway Administration (FHWA,
- 21 2003). Real discount rates used by states historically have ranged from 3% to 5%
- 22 (FHWA, 2003).

1 Total Cost

The four cost components, pre-construction, construction, ROW, and O&M costs, were considered over the 20-year design life and then adjusted to 2014 dollars using the construction cost indexes from the Engineering News Record. These cost components were then summed to determine the total BMP cost. We used the annual inflation rates for each year of the period of analysis (2004 to 2014), which ranged from 4.65% to 2.65%.

#### **Cost Effectiveness**

- The equations in this section follow English units, following the convention in the Virginia Stormwater Management Handbook (VADCR, 1999). For the equations in SI units, please see the supplementary information document provide online with this paper.
- 12 Per Cubic Foot of Water Quality Volume Treated
- The BMP costs were divided by the water quality volume (WQV) treated to
  determine the BMP cost per cubic foot and for comparison to previously published BMP
  costs. Following standard practices in place when the BMPs were designed and
  constructed (VADCR, 1999), WQV was estimated as

$$WQV = \left(P \times R \times A \times DV \times 43,560 \text{ ft}^2 \text{ acre}^{-1} \div 12 \text{ in ft}^{-1}\right)$$
 (1)

18 where

- $WQV = water quality volume (ft^3)$
- P = precipitation depth (in) = 0.5 in,
- R = ratio of runoff to rainfall = 0.95,
- A = impervious area (acre),

- DV = design volume factor (extended detention basins = 2, enhanced extended detention basin = 2, and sand filter = 1) (VADCR, 1999).
- 3 This approach for estimating WQV for a BMP using Virginia design codes has since
- 4 been updated (VADCR, 2011) and projects are just beginning to use the new regulations
- 5 due to a grandfather period. The potential impact of this change on the results of this
- 6 study is discussed in the Results and Discussion section.
- 7 Per Pound of Phosphorus Removal
- 8 For comparison to current prices of nutrient credits, the BMP total costs were
- 9 divided by the annual phosphorus removal to determine the BMP cost per pound of
- annual phosphorus removal. Again following standard practices in place when the BMPs
- were designed and constructed (VADCR, 1999), phosphorus removal was estimated
- using the following procedure. First, the phosphorus load entering the BMP is estimated
- 13 as

14 
$$L = P \times P_j \times [0.05 + (0.009 \times I)] \times C \times A \times 2.72 \div 12$$
 (2)

- 15 where
- $L = \text{annual phosphorus load (lb yr}^{-1}),$
- P = average annual rainfall (in yr<sup>-1</sup>) = 43 in yr<sup>-1</sup> for Virginia,
- $P_j$  = unitless correction factor for a storm with no runoff = 0.9,
- 19 I = percent impervious cover,
- C = flow-weighted mean pollutant concentration (mg/L) = 0.26 mg/L,
- A = applicable area (acre).

- 1 The numbers 2.72 and 12 are unit conversion factors while 0.05 and 0.009 are regression
- 2 coefficients.
- 3 Simplifying Equation 2, the annual phosphorus load entering each BMP per acre
- 4 of impervious surface is calculated as

$$L_{acre} = \left[0.05 + \left(0.009 \times 100\%\right)\right] \times 1 \text{ acre } \times 2.28$$

$$= 2.17 \text{ lb acre}^{-1} \text{ yr}^{-1}$$
(3)

- 6 where
- $L_{acre}$  = annual phosphorus load from one impervious acre (lb yr<sup>-1</sup>).
- 8 The impervious acreage treated by each BMP is converted into the annual phosphorus
- 9 load entering each BMP as

$$L_{BMP} = A_{BMP} \times L_{acre} \tag{4}$$

- 11 where
- $L_{BMP}$  = phosphorus load entering the BMP (lb yr<sup>-1</sup>), and
- $A_{BMP}$  = impervious area treated by the BMP (acre).
- 14 To obtain the annual phosphorus load removed by the BMP, the load entering the BMP
- was multiplied by the pollutant removal efficiency for that BMP provided in the Virginia
- 16 Stormwater Management Handbook (VADCR, 1999) as

$$R_{\rm BMP} = L_{\rm BMP} \times Eff_{\rm BMP} \tag{5}$$

- 18 where
- $R_{BMP}$  = phosphorus removal by a BMP (lb yr<sup>-1</sup>),
- $L_{BMP}$  = phosphorus load entering the BMP (lb yr<sup>-1</sup>), and
- $Eff_{BMP} = pollutant removal efficiency of the BMP.$

#### **RESULTS AND DISCUSSION**

Results from the analysis are presented in this section using English units to be consistent with related studies. Readers can find the same figures, tables, and equations reported in SI units in the supplementary information document provide online with this paper.

#### **BMP Cost Efficiency**

Table 1 presents the properties for each BMP including the estimated WQV treatment and annual phosphorus removal while Table 2 presents the present costs for each BMP. The costs are presented both with and without ROW costs, given the variability in ROW costs. Cost efficiency is also reported by dividing the annual phosphorus removal in pounds for each BMP.

The cost estimates for the construction and O&M components of each BMP analyzed in this study were compared to cost estimates for construction and O&M published in the literature using the relationship established by Weiss et al. (2011, 2007). Figure 2 presents the estimated costs compared to the published costs of extended detention basins. Table 3 presents the comparison for enhanced extended detention basins and sand filters. The estimated costs for all BMPs were within or near the 67% confidence intervals of published cost. The enhanced extended detention basin was compared to the combined cost of a constructed wetland (e.g., to incorporate installation of vegetation) and an extended detention basin (e.g. to incorporate excavation and infrastructure) as the closest related BMP type due to the fact that there was no established relationship between WQV treated and the cost of construction and O&M for

an enhanced extended detention basin in Weiss et al. (2011, 2007). Overall, this comparison suggests that the cost estimates derived from analyzing historical records on BMPs constructed by VDOT are in line with results from prior studies determining BMP costs.

Figure 2 also highlights the variability in BMP costs with BMPs 1-4 falling near the lower bound of the 67% confidence interval and BMPs 5-7 falling near the upper bound of the confidence interval. Looking specifically at BMPs 3, 5, and 6 illustrates this variability in cost. While each of these BMPs treat approximately the same WOV and all three BMPs fall within the confidence interval reported by Weiss et al. (2011, 2007), BMP 3 is significantly less expensive compared to BMPs 5 and 6. By exploring the construction data for these BMPs, we found that these differences in costs were due to installation of a required clay liner for BMPs 5 and 6 that was not required with BMP 3. In addition, the construction cost for BMP 5 included a temporary sediment basin that was not required for BMPs 3 and 6. Likewise, comparing BMPs 1 and 2, which also both treated the same WQV, shows BMP 2 is about twice as expensive because it required additional excavation and purchase of fill compared to BMP 1. These results are important because it suggests that the lower bound of the Weiss et al. (2011, 2007) confidence interval may be appropriate for VDOT BMPs when no unexpected costs or complications are encountered and the upper bound may represent a price ceiling for BMPs with site constraints or requiring additional features such as clay liners, purchasing of fill, etc..

The two most expensive BMPs were the two non-extended detention basin BMPs: BMP 8, a sand filter, and BMP 9, an enhanced extended detention basin (Table 3). These

- 1 BMPs were \$6,700 to \$14,800 more expensive per pound (\$14,771 to \$32,628 per
- 2 kilogram) of annual phosphorus removed compared to the more traditional extended
- dentation basins. This result is in line with past research that has shown extended
- 4 detention basins to be among the most cost effective BMPs when sufficient space is
- 5 available for constructing the BMP (Caltrans, 2004).

# **Comparison to Nutrient Credit Prices**

- 7 VDOT has recently procured fixed prices for nutrient credits (expressed in 2014
- 8 dollars per a pound of phosphorus removed annually) in the James, Potomac, and York
- 9 River basins. At the time of this study, the per-pound cost for nutrient credit in the James
- and Potomac River basins was \$10,430 and \$18,700 (per-kilogram cost was \$22,994 and
- \$41,226), respectively. In the York River basin, costs ranged from \$17,000 to \$20,000
- 12 (\$37,479 to \$44,092 per kilogram) based on a sliding scale, where the price per pound
- decreased as more nutrient credits are purchased.
- Table 4 and Figures 3 and 4 compare the BMP cost estimates excluding and
- including ROW to the cost of one pound of nutrient credit. BMP 7 is excluded from this
- 16 comparison because it would not have qualified for 100% substitution under current
- 17 regulatory guidelines, as explained earlier. Based on this comparison, if current
- 18 regulations were in place when these BMPs were constructed, purchasing nutrient credits
- in lieu of constructing these BMPs could have resulted in a 52% savings on average
- 20 (ranging from 5% to 75% with a median savings of 62%) when ROW costs are included.
- For extended detention basins, purchasing nutrient credits in lieu of constructing the
- basins could have resulted in a 45% savings on average (ranging from 5% to 63% with a

1	median savings of 52%) when ROW costs are included. When ROW costs are excluded,
2	credit prices still offer cost savings for all but two of the BMPs: BMPs 1 and 3. Overall,
3	the average cost savings when excluding ROW costs drops to 32% (ranging from -25% to
4	65% with a median savings of 47%). For extended detention basins, the average cost
5	savings when excluding ROW costs drops to 21% (ranging from -25% to 53% with a
6	median savings of 29%). The BMP closest to current nutrient credit prices when
7	including ROW costs was BMP 3, an extended detention basin constructed in the York
8	River Basin to treat 8 impervious acres and remove 6 pounds of phosphorus annually.
9	Due to the fact that the BMP treated a large area, and because it had a relatively low pre-
10	construction and construction cost, the BMP was very cost effective. However, compared
11	to current nutrient credit prices obtained by VDOT, the total BMP cost is still 5% higher
12	than purchasing credits when including ROW cost for the BMP footprint.
13	The least cost effective BMP was an enhanced extended detention basin (BMP ID
14	9) in the Potomac River Basin. The basin was designed to treat 9.2 impervious acres
15	(39,740 m <sup>2</sup> ) and remove nearly 10 pounds (4.5 kg) of phosphorus annually, so it was also
16	one of the larger BMPs analyzed. The basin was the most expensive in all four of the cost
17	components. This could be because it was the only enhanced extended detention basin
18	analyzed and because it was significantly more expensive in terms of ROW costs, which
19	were just over \$200,000 and \$138,000 more expensive than any other BMP analyzed.
20	At nutrient credit prices available to VDOT at the time of this study, purchasing
21	credits is a cost effective means for achieving compliance with stromwater quality

regulations compared to the total cost of BMP construction and maintenance (Table 4).

Given that in Virginia nutrient credits are granted in perpetuity, they become even more

- 1 attractive compared to the total cost of designing, constructing, operating, and
- 2 maintaining BMPs, which are expected to last 20 years. Assuming current pricing and
- 3 regulatory frameworks hold, we expect to see nutrient credit purchasing becoming a more
- 4 widely used practice in Virginia in coming years.

### **Impact of Current Trends in Stormwater Management on Results**

This study was based on historical data and regulatory guidelines for designing BMPs in place when those BMPs were constructed. The overwhelming choice for BMPs used by VDOT in the past has been extended detention basins, therefore the majority of the BMPs we analyzed were extended detention basins. Virginia has recently revised its state stormwater regulations (Stephenson et al., 2010; VADCR, 2011). The new regulations focus on updating water quality treatment sizing; updating the efficiencies of select BMPs; and implementing low-impact development approaches such as vegetated filter strips, grass channels, permeable pavement, infiltration practices, bioretention facilities, filtering practices, constructed wetlands, retention basins, and dry/wet swales.

Water quality treatment sizing will be based on the first one inch (25.4 mm) of rainfall over the entire development site, rather than the previous treatment size of the first 0.5 inch (12.7 mm) of runoff from only the impervious area of the site (VADCR, 2011). These combined alterations to regulations may result in the need for multiple structural and non-structural BMPs combined into treatment trains to achieve compliance with Virginia stormwater quality regulations for runoff (Stephenson et al., 2010). Because of these changes, construction of BMPs in the future may be more expensive and purchasing

These new regulations will likely alter the way BMPs are designed in the future.

- 1 nutrient credits may become an even more attractive option in terms of cost savings.
- 2 However, few projects have been constructed to date under the new regulations due to a
- 3 grandfathering period, so there is still uncertainty regarding how new regulatory
- 4 framework will impact actual BMP design, construction, and O&M costs.
- Moving forward, it will become increasingly important to track BMP costs
- 6 separately from other costs within a construction project. Doing so will provide more
- detailed, accurate, and up-to-date information that will aid in determining break-even
- 8 points between purchasing nutrient credits and constructing onsite BMPs. This study
- 9 provides further evidence of the variability in BMPs costs that are a function of the BMP
- 10 type as well as specific site conditions and constraints. If new regulations result in
- changes to BMP types preferred by designers, it will be important to collect additional
- data on these BMP costs and the specific conditions that drive their costs. While this
- study suggests that the current credit prices procured by VDOT are an attractive option in
- most circumstances, especially when purchase of additional ROW is required for the
- BMP, this result was largely based on past construction data and should be periodically
- updated to reflect future changes in BMP types, construction practices, construction
- 17 costs, and regulatory guidelines.

### **Nutrient Credits within a Broader Sustainability Context**

- Although this study suggests that nutrient credits are a cost effective alternative
- 20 for BMPs constructed to achieve compliance with stormwater quality regulations, the
- overall sustainability of a nutrient credit program should be further studied.
- 22 Environmental challenges of nutrient credits include the uncertainty of the equivalency of

1	pollutant reduction created by a nonpoint source credit generator and potential creation of
2	localized areas of elevated impaired water quality (Fisher-Vanden and Olmstead, 2013;
3	Willamette Partnership, 2012). The uncertainty of pollutant reduction is attributed to the
4	stochastic nature of runoff from nonpoint sources, which can vary greatly spatially and
5	temporally depending on topography, soil characteristics, geology, rainfall, temperature,
6	and vegetative cover. For this reason, substitution of nutrient credits is limited spatially
7	(e.g., in Virginia, trades are limited to within an approximately 700 square mile 8-digit
8	USGS HUC) to reduce environmental risk. Further research could study if this spatial
9	restriction is sufficient. Another inherent challenge to nutrient credits for stormwater
10	quality is non-uniform mixing of a pollutant, which can lead to localized areas of
11	elevated of impaired water quality, unlike air quality trading where one ton emitted from
12	one location is more closely equivalent to one ton emitted elsewhere (Fisher-Vanden and
13	Olmstead, 2013). Trade efficiency issues may arise if impairment of the water quality is
14	non-linearly related to the pollutant concentration (e.g., an endangered species that is
15	sensitive to the pollutant). Monitoring of water quality at a local and watershed levels
16	would enable better assessment of environmental performance for sites eligible for
17	nutrient credit programs (Stavins, 2014; Faeth, 2000).
18	Social challenges of nutrient credits include the willingness of participation in
19	credit generation and public support. Agricultural farms, a potential source of nonpoint
20	credit generation, may be hesitant to engage in credit generation for a number of reasons
21	including uncertainty of cost effectiveness from the generator's perspective, concern that

participation may be a precursor for increased regulation, or the perception to the public

that generators are helping purchasers absolve their responsibility for water quality

management (Willamette Partnership, 2012). Further research could help quantify the
cost effectiveness of credit generation for the agricultural community. With an increasing
interest of the general public in water quality, participants of nutrient credit programs
could work cooperatively with the general public to address concerns and increase
transparency to prevent public opposition (Jarvie and Soloman, 1998).

#### CONCLUSIONS

Results of the analysis of nine BMPs found that their cost ranged from \$20,100 to \$74,900 per pound (\$44,313 to \$165,126 per kilogram) of phosphorus removed. These costs are highly variable both across BMP types and within a given BMP. For example, while this study assumes pre-construction costs to be 32% of the construction costs, preconstruction costs could actually range between 10 to 40% of construction costs. Similar variability exists for other components of the total BMP cost; the values provided in this study should, therefore, be interpreted in light of this variability. Extended detention basins have been the dominant BMP used in the past by VDOT (92% of all BMPs constructed by VDOT from 1997 to 2014 were extended detention basins) and, for this reason, they were the dominant BMP type included in this study. The seven extended detention basins were more cost effective than the two non-extended detention basins (a sand filter and an extended detention enhanced basin) by over \$22,000 per pound (\$48,502 per kilogram) of phosphorus removed when excluding ROW costs. ROW costs are a major source of variability in the total cost of a BMP, as were the particular site constraints or needs (e.g., additional fill, clay liners, etc.) for construction of the BMP.

Results of this study suggest current prices for nutrient credits available to VDOT present an attractive alternative to constructing onsite BMPs, especially when additional ROW must be purchased for the BMP. With the exception of two of the seven extended detention basins analyzed, nutrient credit prices were less expensive than the total cost of the BMP when excluding the potential cost of purchasing additional ROW for the BMP. After including additional ROW for the BMP footprint, all of the nine BMPs analyzed exceeded the price of nutrient credits on a per pound cost efficiency basis. This result suggests that, at current prices, nutrient credits are a cost effective alternative except perhaps for highly cost effective BMPs like extended detention basins with no unusual site constraints and no need for additional ROW purchase.

Stormwater regulations in Virginia have recently changed and it is likely that these changes will result in new BMP implementation strategies to meet regulatory guidelines in the future. These changes in stormwater regulations follow national trends and emphasize reducing the runoff volume from developed sites in addition to limiting the post-construction peak discharge to pre-development conditions. It remains to be seen exactly how these changes will impact BMP selection, design, and costs in the future because few projects have been constructed under these new conditions. Based on this and related research, it is clear that BMP costs are time dependent for a variety of reasons and so it is important to periodically update BMP cost estimates.

While this study focused on cost, there are other important factors to consider tor projects that meet the regulatory criteria to allow for nutrient credit substitution. The ultimate decision of whether to construct onsite BMPs or purchase credits should extend beyond a simple cost analysis to also take into consideration environmental and social

aspects of the project. Within this broader sustainability context, it is important for future research to improve understanding of the environmental equivalency of onsite pollutant reduction compared to pollutant reduction through credit purchase. While this relationship is uncertainty and can vary greatly across sites, new tools and approaches for establishing environmental equivalency that take these factors into account will benefit the overall sustainability of nutrient credit use.

Obtaining detailed, place-specific, and up to date information on the lifetime costs of BMPs that include design, construction, and maintenance remains a very challenging task. Our approach for obtaining construction cost data required careful consideration and interpretation of overall site plans for construction projects to piece-out the stormwater specific costs. If procedures were put in place to track costs specific for stormwater management separately within a larger construction project in the future, then it would greatly simplify the process that we used, and potentially result in more accurate cost data. With this detailed BMP cost data more readily available in the future, decision makers would be better able to produce accurate break-even points early in the stormwater planning process for deciding between purchasing credits in lieu of constructing onsite BMPs.

#### **ACKNOWLEDGMENTS**

This study was supported by funding from the Federal Highway Administration.

The authors thank VDOT for providing the data for this study and Roy Mills, John

Olenik, and Hillary Goldstein of VDOT; Doug Beisch of Stantec; and James Gillespie of

- 1 the Virginia Transportation Research Council for their valuable data, guidance, and
- 2 feedback.

#### SUPPORTING INFORMATION

- 4 Additional supporting information may be found online under the Supporting
- 5 Information tab for this article: a version of the Cost Effectiveness section written using
- 6 SI units along with figures and tables also in SI units.

## LITERATURE CITED

- 8 Abbasi, S.A., Koskelo, A., 2013. Pollutant Load Reductions for Total Maximum Daily
- 9 Loads for Highways: A Synthesis of Highway Practice (Publication NCHRP
- Synthesis No. 444). Transportation Research Board, Washington, D.C.
- American Society of Civil Engineering (ASCE), 2014. International Stormwater BMP
- Database [WWW Document]. URL http://www.bmpdatabase.org/ (accessed
- 13 11.4.15).
- 14 Arika, C., Canelon, D.J., Nieber, J.L., Skyes, R., 2006. Impact of Alternative Storm
- Water Management Approaches on Highway Infrastructure, Guide for Selection of
- Best Management Practices (Publication No. MN/RC-2005-49A). Minnesota
- 17 Department of Transporation (MnDOT).
- Arnold, C.L., Gibbons, C.J., 1996. Impervious Surface Coverage: The Emergence of a
- 19 Key Environmental Indicator. J. Am. Plan. Assoc. 62, 243–258.
- 20 doi:10.1080/01944369608975688
- 21 Brown, W., Schueler, T., 1997. Economics of Stormwater BMPs in the Mid-Atlantic
- Region. Silver Spring, MD.
- 23 California Department of Transportation (Caltrans), 2004. BMP Retrofit Pilot Program
- 24 (Report No. CTSW-RT-01-050). Sacramento, Calif.
- Faeth, P. 2000. Fertile Ground: Nutrient Trading's Potential to Cost-Effectively Improve
- Water Quality. World Resources Institute. □
- 27 FHWA, 2003. Economic Analysis Primer [WWW Document]. FHWA-IF-03-032. Fed.

Highw. Adm. U.S. Dep. Transp. URL http://www.fhwa.dot.gov/infrastructure/asstmgmt/primer00.cfm Fisher-Vanden, K. and S. Olmstead, 2013. Moving Pollution Trading from Air to Water: Potential, Problems, and Prognosis. Journal of Economic Perspectives, Vol. 27, No. 1. pp. 147–172. □ King, D., Hagan, P., 2011. Costs of Stormwater Management Practices in Maryland Counties (Technical Report Series No. TS-626-11). The University of Maryland Center for Environmental Science, Solomons, MD. Jarvie, M. and B. Soloman, 1998. Point-Nonpoint Effluent Trading in Watersheds: A Review and Critique. Environmental Impact Assessment Review, Vol. 18, No. 2, pp. 135-157. NCHRP, 2012. Guidelines for Evaluating and Selecting Modifications to Existing Roadway Drainage Infrastructure to Improve Water Quality in Ultra-urban Areas (Report 728). National Cooperative Highway Research Program (NCHRP), Transportation Research Board, Washington, D.C. Sample, D.J., Heaney, J.P., Wright, L.T., Fan, C.-Y., Lai, F.-H., Field, R., 2003. Costs of Best Management Practices and Associated Land for Urban Stormwater Control. J. Water Resour. Plan. Manag. 129, 59–68. doi:10.1061/(ASCE)0733-9496(2003)129:1(59) Southeastern Wisconsin Regional Planning Commission (SWRPC), 1991. Costs of Urban Nonpoint Source Water Pollution Control Measures, Technical Report Number 31. Southeastern Wisconsin Regional Planning Commission, Waukesha, Wis. Stavins, R. N., 2001. Experience with Market-Based Environmental Policy Instruments. [WWW Document] URL http://www.hks.harvard.edu/m-rcbg/research/r.stavins handbook experience.with.market.based.environmental.pdf. (Accessed June 18, 2014). Stephenson, K., Aultman, S., Metcalfe, T., Miller, A., 2010. An evaluation of nutrient nonpoint offset trading in Virginia: A role for agricultural nonpoint sources? Water Resour. Res. 46, W04519. doi:10.1029/2009WR008228 Thurston, H.W., 2012. Background and Introduction, in: Thurston, H.W. (Ed.), Economic Incentives for Stormwater Control. CRC Press, Boca Raton, FL, p. 256. USEPA, 1999. Preliminary Data Summary of Urban Storm Water Best Management

Practices (Report No. EPA-821-R-99-012). U.S. Environmental Protection Agency,

O.CC

1	Office of water, washington, DC.
2 3	USGS, 2014. U.S. Geological Survey National Map Viewer [WWW Document]. URL http://viewer.nationalmap.gov/viewer
4 5 6 7	Va. Code Ann., 2015. § 62.1-44.15:35. Nutrient credit use and additional offsite options for construction activities. [WWW Document]. URL http://law.lis.virginia.gov/vacode/title62.1/chapter3.1/section62.1-44.15:35/ (accessed 11.10.15).
8 9 10	VADCR, 1999. Virginia Stormwater Management Handbook, First Edition. Division of Soil and Water Conservation, Virginia Department of Conservation and Recreation, Richmond, VA.
11 12 13	VADCR, 2011. Virginia Stormwater Management Handbook, Second Edition. Virginia Department of Conservation and Recreation, Division of Stormwater Management, Richmond, VA.
14 15 16	VADEQ, 2016, Nonpoint Source Nutrient Credit Registry. [WWW Document]. URL http://www.deq.virginia.gov/Portals/0/DEQ/Water/PollutionDischargeElimination/N onpointCreditRegistry.pdf (accessed 06.02.2016).
17 18 19	Weiss, P.T., Gulliver, J.S., Erickson, A.J., 2007. Cost and Pollutant Removal of Storm-Water Treatment Practices. J. Water Resour. Plan. Manag. 133, 218–229. doi:10.1061/(ASCE)0733-9496(2007)133:3(218)
20 21 22	Weiss, P.T., Gulliver, J.S., Erickson, A.J., 2011. Costs and Effectiveness of Stormwater Mangement Practices, in: Thurston, H.W. (Ed.), Economic Incentives for Stormwater Control. CRC Press, Boca Raton, FL, p. 256.
23 24 25 26	Wiegand, C., Schueler, T., Chittenden, W., Jellick, D., 1986. Cost of Urban Runoff Controls, in: Urbonas, B., Roesner, L.A. (Eds.), Urban Runoff Quality: Impact and Quality Enhancement Technology. American Society of Civil Engineers, Reston, VA.
27 28 29 30	Willamette Partnership, 2012. In It Together: A How-To Reference for Building Point-Nonpoint Water Quality Trading Programs. [WWW Document] URL http://willamettepartnership.org/in-it-together/In%20It%20Together%20Part%203_2012.pdf. (accessed June 18, 2014).

Table 1: BMP properties. (See Table S.1 in the supplemental document for the equivalent information in SI units.)

			Impervious	WQV	Annual Phosphorus	
			Area Treated	Treated	Removal	Removal
ID	BMP Type	4-digit HUC	(acres)	$(ft^3)$	(lb)	Efficiency
1	Extended detention basin <sup>a</sup>	York	2.44	8414.34	1.85	35%
2	Extended detention basin <sup>a</sup>	York	2.56	8828.16	1.94	35%
3	Extended detention basin <sup>a</sup>	York	8.01	27622.49	6.08	35%
4	Extended detention basin <sup>b</sup>	Potomac	4.27	14725.10	3.24	35%
5	Extended detention basin <sup>b</sup>	Potomac	7.33	25277.51	5.57	35%
6	Extended detention basin <sup>b</sup>	Potomac	7.42	25587.87	5.64	35%
7	Extended detention basin <sup>b</sup>	Potomac	15.15	52244.78	11.51	35%
8	Sand filter <sup>c</sup>	Potomac	4.40	7586.70	6.21	65%
9	Extended detention enhanced basin <sup>c</sup>	Potomac	9.20	31726.20	9.98	50%

BMP = best management practice; HUC = hydrologic unit code; WQV = water quality volume. Policy

<sup>&</sup>lt;sup>a</sup> Functional class: rural collector rolling undivided.

<sup>&</sup>lt;sup>b</sup> Functional class: rural principal arterial.

<sup>&</sup>lt;sup>c</sup> Functional class: urban minor arterial.

Table 2: BMP component costs, total costs, and cost effectiveness. (See Table S.2 in the supplemental document for the equivalent information in SI units.)

							Per Pound of A	Annual
					Total		Phosphorus Re	emoval
BMP	Pre-		Lifetime		Excluding	Including	Excluding	Including
ID	Construction	Construction	O&M	ROW	ROW	ROW	ROW	ROW
1	\$7,487.90	\$23,399.69	\$3,481.28	\$24,081.55	\$34,368.87	\$58,450.43	\$18,545.89	\$31,540.61
2	\$15,049.60	\$47,030.01	\$6,996.88	\$35,691.84	\$69,076.49	\$104,768.33	\$35,527.32	\$53,884.30
3	\$20,083.53	\$62,761.02	\$9,337.26	\$30,077.16	\$92,181.80	\$122,258.96	\$15,152.52	\$20,096.50
4	\$15,265.14	\$47,703.55	\$7,097.08	\$35,327.13	\$70,065.77	\$105,392.89	\$21,604.80	\$32,497.93
5	\$48,580.29	\$151,813.40	\$22,586.00	\$57,992.14	\$222,979.68	\$280,971.82	\$40,052.86	\$50,469.73
6	\$46,085.87	\$144,018.34	\$21,426.29	\$62,088.79	\$211,530.50	\$273,619.28	\$37,535.42	\$48,552.88
7	\$79,023.29	\$246,947.78	\$36,739.59	\$53,814.44	\$362,710.66	\$416,525.10	\$31,522.45	\$36,199.35
8	\$29,889.55	\$93,404.84	\$166,755.37	\$49,801.21	\$290,049.76	\$339,850.97	\$46,735.48	\$54,759.91
9	\$88,069.13	\$275,216.03	\$184,253.38	\$200,549.55	\$547,538.54	\$748,088.08	\$54,852.59	\$74,943.71

BMP = best management practice; O&M = operation and maintenance; ROW = right-of-way

<sup>5</sup> Note: Costs are presented in 2014 U.S. dollars.

Table 3: Comparison of estimated and published costs for construction and O&M of the sand filter and enhanced extended detention basin.

		Construction + O&M Cost						
ID	BMP Type	Cost Estimate	Average	Upper 67% CI	Lower 67% CI			
8	Sand filter	\$260,160.21	\$196,720.33	\$440,089.49	\$110,547.15			
9	Enhanced extended detention basin	\$459,469.41	\$218,790.39	\$128,836.32	\$437,005.44			

BMP = best management practice; O&M = operation and maintenance; CI = confidence interval,

Average = average published cost; Upper and Lower 67% CI = 67% confidence interval for published cost.

Note: Costs are presented in 2014 U.S. dollars.

Table 4: Potential cost savings of purchasing nutrient credit in lieu of constructing onsite BMPs. BMP 7 was excluded from the table because it would not have qualified for 100% off-site nutrient credits due to its disturbed area being greater than 10 acres (40,469 square meters) and post-construction phosphorus reduction requirement being greater than 10 pounds (4.5 kilograms) per year. (See Table S.3 in the supplemental document for the equivalent information in SI units.)

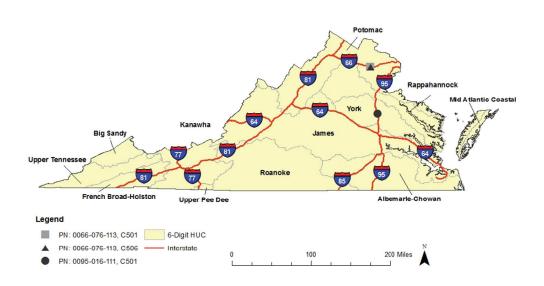
				Credit Cost	Potential Cost Savings from	
		Total BMP Cost Per Pound of		Per Pound of	Purchasing Credits in lieu of onsite	
BMP		Annual Phosphorus Removal		Credit	BMP	
ID	BMP Type	Excluding ROW	Including ROW	Removal <sup>1</sup>	Excluding ROW	Including ROW
1	Extended detention basin	\$18,545.89	\$31,540.61	\$20,000	-7.84%	36.59%
2	Extended detention basin	\$35,527.32	\$53,884.30	\$20,000	43.71%	62.88%
3	Extended detention basin	\$15,152.52	\$20,096.50	\$19,000	-25.39%	5.46%
4	Extended detention basin	\$21,604.80	\$32,497.93	\$18,700	13.45%	42.46%
5	Extended detention basin	\$40,052.86	\$50,469.73	\$18,700	53.31%	62.95%
6	Extended detention basin	\$37,535.42	\$48,552.88	\$18,700	50.18%	61.49%
Median	Extended detention basin	\$28,566.06	\$40,525.41	\$18,850	28.58%	51.98%
Average	Extended detention basin	\$28,069.80	\$39,506.99	\$19,183	21.24%	45.31%
8	Sand filter	\$46,735.48	\$54,759.91	\$18,700	59.99%	65.85%
9	Enhanced extended					
	detention basin	\$54,852.59	\$74,943.71	\$18,700	65.91%	75.05%
Median	Overall	\$36,531.37	\$49,511.31	\$18,700	46.95%	62.19%
Average	Overall	\$33,750.86	\$45,843.20	\$19,063	31.67%	51.59%

Current credit prices for the watershed in which the BMP is located.

BMP = best management practice; ROW = right of way.

Note: Costs are presented in 2014 U.S. dollars.

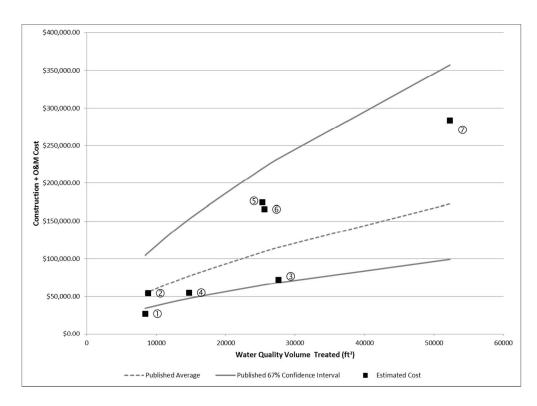
- Figure 1: Map showing Virginia's 6-digit hydrologic unit code (HUC) basins and the locations of
- 2 the three construction projects used in the cost comparison. PN = project number.
- 3 Figure 2: Comparison of estimated and average published costs for construction and O&M of
- 4 extended detention basins. The data points represent the cost estimates, the dashed line
- 5 represents the average published cost, and the solid lines represent the 67% confidence interval
- 6 for the average published cost (Weiss et al., 2011, 2007). Circled numbers represent BMP IDs.
- 7 Costs are presented in 2014 U.S. dollars. (See Figure S.1 in the supplemental document for the
- 8 equivalent information in SI units.)
- 9 Figure 3: Comparison of total BMP cost (excluding right of way, ROW) and nutrient credit cost.
- 10 Costs are presented in 2014 U.S. dollars. (See Figure S.2 in the supplemental document for the
- 11 equivalent information in SI units.)
- Figure 4: Comparison of total BMP cost (including right of way, ROW) and nutrient credit cost.
- 13 Costs are presented in 2014 U.S. dollars. (See Figure S.3 in the supplemental document for the
- 14 equivalent information in SI units.)



Map showing Virginia's 6-digit hydrologic unit code (HUC) basins and the locations of the three construction projects used in the cost comparison. PN = project number.

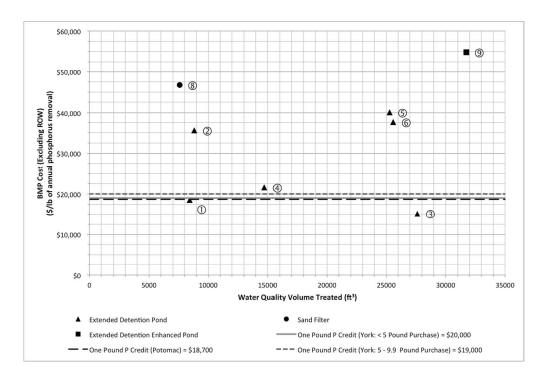
142x84mm (180 x 180 DPI)





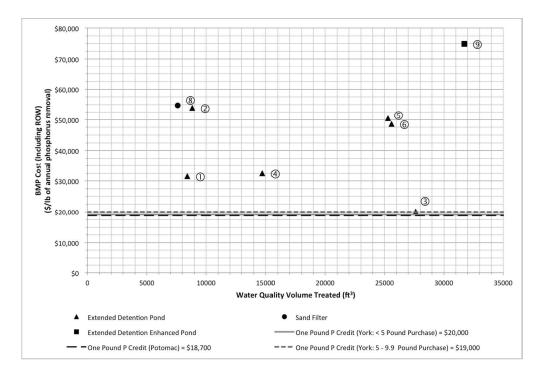
Comparison of estimated and average published costs for construction and O&M of extended detention basins. The data points represent the cost estimates, the dashed line represents the average published cost, and the solid lines represent the 67% confidence interval for the average published cost (Weiss et al., 2011, 2007). Circled numbers represent BMP IDs. Costsare presented in 2014 U.S. dollars. (See Figure S.1 in the supplemental document for the equivalent information in SI units.)

140x101mm (259 x 259 DPI)



Comparison of total BMP cost (excluding right of way, ROW) and nutrient credit cost. Costs are presented in 2014 U.S. dollars. (See Figure S.2 in the supplemental document for the equivalent information in SI units.)

152x104mm (235 x 235 DPI)



Comparison of total BMP cost (including right of way, ROW) and nutrient credit cost. Costs are presented in 2014 U.S. dollars. (See Figure S.3 in the supplemental document for the equivalent information in SI units.)

152x104mm (235 x 235 DPI)