

Addressing Uncertainty in Watershed Management

Thomas E. Davenport, USEPA Region 5

Steven A. Dressing, Tetra Tech, Inc.

Donald W. Meals, Tetra Tech, Inc.

Uncertainty

- A lack of complete knowledge
- Prediction error resulting from limitations in data and models

Important in:



- Assessment
- Planning
- Implementation
- Progress assessment



TMDL



$$\text{TMDL} = \sum \text{WLA} + \sum \text{LA} + \text{MOS} + \text{Future Growth}$$

WLA = point source load allocation

LA = nonpoint source load allocation

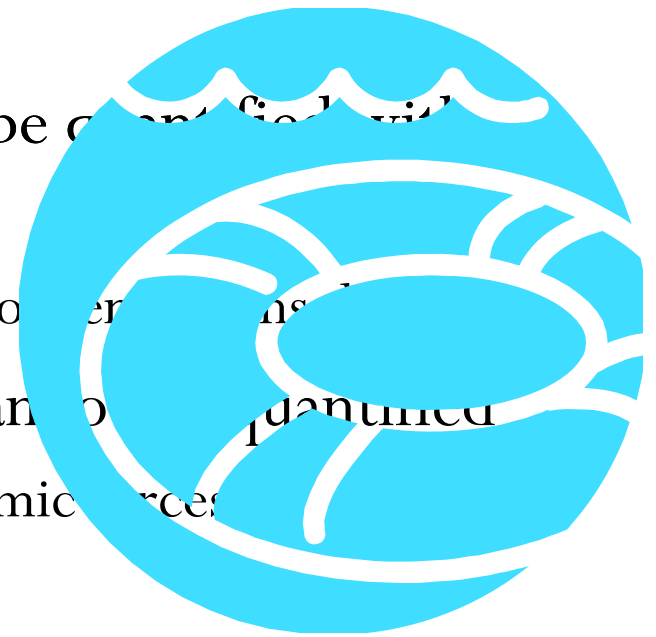
MOS = margin of safety to account for uncertainty in analysis

Future Growth = allowance for load derived from future growth in the watershed



Margin of Safety (MOS)

- MOS is included in the TMDL to account for uncertainty in the analysis
- The inclusion of an MOS term acknowledges our ignorance regarding both the water quality problem and the solution to the problem
- Fortunately, some uncertainty can be quantified with reasonable success
 - Weather predictions, flow estimates, computer models
- Unfortunately, some uncertainty cannot be quantified
 - Land use changes, social forces, economic forces



Margin of Safety: Two Approaches

Explicit: Allowable pollutant load is reduced by some percentage before required reductions are calculated.

- More straightforward and defensible (?)
 - Walker (2001) on P TMDL analysis for lakes: use best input estimates and an explicit MOS
- Values have ranged from 5% to >40%
 - Maine's statewide bacteria TMDL has explicit 10% MOS for bacteria mass loading (ENSR 2009)
- Quantifies the planners' assessment of uncertainty
- Provides a benchmark for assessing progress for adaptive management

Margin of Safety: Two Approaches


Implicit: C conservative assumption(s) about pollutant reductions are made at various steps in the process.

- Common practice to incorporate one or two conservative assumptions into an implicit MOS
 - Malibu Creek CA bacteria: used wet-year scenario for target loads as a “worst case” loading scenario (CRWQCB 2004)
 - Lower Pocomoke MD/VA bacteria: used reduced die-off rate coefficient to calculate target loads (MDE & VDEQ 2009)
 - Buzzards Bay MA pathogens: implicit MOS assuming no bacteria die-off or dilution in receiving waters (MA DEP 2009)
- Can be taken to extremes: too many unquantified assumptions

Assessment Uncertainty

- Environmental Variability
 - Distance, direction, and elevation relative to pollution sources
 - Nonuniform distribution of pollution: topography; hydrogeology; meteorology; tides; biological, chemical, and physical redistribution mechanisms
 - Diversity in species composition, sex, mobility, and preferred habitats
 - Variation in natural background levels over time and space
 - Variable source emissions, flow rates, and dispersion parameters over time
 - Buildup or degradation of pollutants over time.

Assessment Uncertainty

- 
- Water Quality Criteria
 - Adequacy to protect uses
 - Stems from incomplete knowledge of how the environment works
 - Relationship of indicator bacteria to pathogens
 - Monitoring protocols used to assess use support
 - Sampling location(s)
 - Sampling frequency
 - Weather / season

Match of monitoring parameters to criteria Turbidity vs. SSC

- Error is introduced (SE)
- Different relationship for each stream
- Data intensive exercise

Power regression equations for estimating SSC from in-stream turbidity (T).

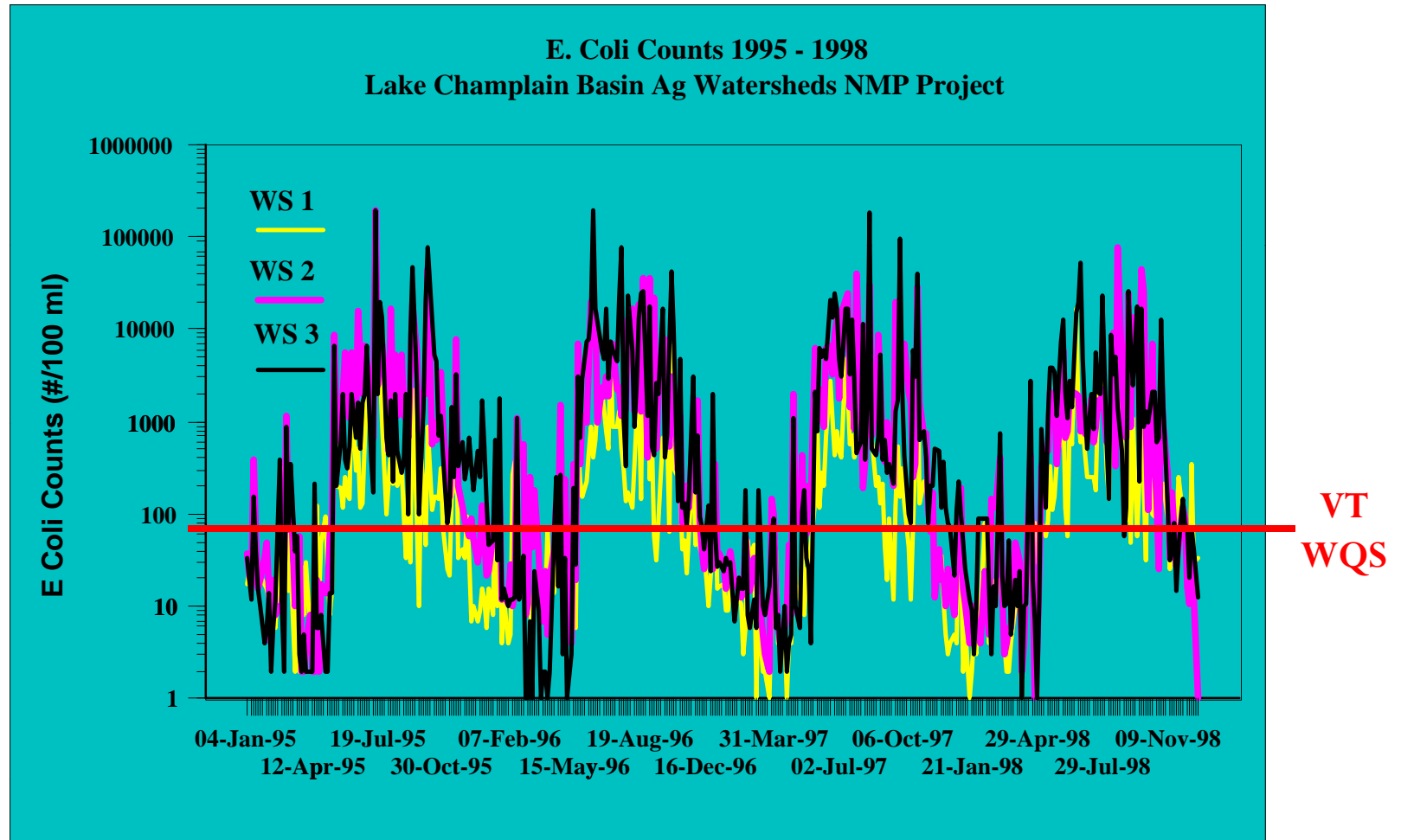
| Station | Power Model Equation | R ² and Standard Error |
|---------|--|-----------------------------------|
| 1 | SSC=1.70•T ^{1.04} • (1.10, Bias Correction Factor) | R ² = 0.912 SE=33.2 |
| 2 | SSC=1.85•T ^{0.988} • (1.17, Bias Correction Factor) | R ² = 0.948 SE=39.3 |
| 3 | SSC=1.45•T ^{1.08} • (1.13, Bias Correction Factor) | R ² = 0.964 SE=30.1 |

Assessment Uncertainty

- Monitoring
 - Design
 - Site selection – representative?
 - Seasonal
 - Diurnal
 - Habitat
 - Temporal and spatial for chemistry
 - Collection methods
 - Sample handling
 - Sample analysis
 - Data analysis (including modeling)



Seasonal Variation



Assessment Uncertainty

- Source Identification
 - Pollutant pathways understood?
 - Garvin Brook, MN: 15 wells drilled for baseline monitoring later found to yield water from 30 years earlier and not reflect current or near-term land management (Wall et al 1992)
 - False assumptions?
 - e.g., Oak Creek, AZ: ID'd recreation as source of bacteria contamination, finding later that wildlife was the source (NCSU 2009)
 - e.g., RITMDLs: Septic systems ID'd as source of bacteria, but septic system failure rate <3% and many homes on waterbodies have been on sewers for more than a decade (RI DEM 2008)

Assessment Uncertainty

- Source Identification (cont.)
 - Were land use and management assessed properly?
 - Court Creek, IL: Crop production assumed source of erosion, yet studies showed streambank erosion to be major sediment source:
 - >50% in Court Creek (Roseboom and White 1990)
 - >40% in Spoon River, IL (Evans and Schnepfer 1977)
 - Was the management of sources by people representative of the norm?



Planning Uncertainty



- Target Loads
 - Representativeness of underlying database for modeling
 - Point source load assumptions (issues with NPDES data)
 - May report permitted concentration rather than actual concentration
 - May report design, permitted, or actual discharge
 - Factoring in CSO, SSO, CAFO, and stormwater

Planning Uncertainty

● Source Contributions

- True natural background
- Establishing baseline condition
 - How to use historical data
 - Variable loading (e.g., seasonal)



● The Load Calculation

- Simulation study for some Great Lakes tributaries revealed that data from a monthly sampling program, combined with a simple load estimation procedure, gave load estimates which were biased low by 35% or more 50% of the time.

Richards and Holloway 1987

Planning Uncertainty

- BMP Performance
 - Effectiveness variability (e.g., research vs. as-built)
 - Dependence on weather
 - Dependence on human behavior in operation & maintenance of structural practices and in management actions for management-based practices



Range in Reported Removal Efficiencies for Vegetated Filter Strips Treating Surface Runoff

| Reference | TP% | TN% | SS% |
|--------------------------|------------|------------|------------|
| Dillaha et al. 1988 | 2% | 1% | 31% |
| Mendez et al. 1996 | 26% | 21% | - |
| Daniels and Gilliam 1995 | 55% | 40% | 53% |
| Chaubey et al. 1995 | 74% | 67% | - |
| Dillaha et al. 1989 | 93% | 93% | 98% |
| Coyne et al. 1995 | - | - | 99% |

Planning Uncertainty



- **BMP Performance**

- Application of expected performance depends on knowledge of pre-BMP conditions and the conditions under which BMP effectiveness was determined
 - Macatawa Watershed Project, MI: (MACC 1999)
 - P reduction strategy based on modeling assuming cropland conventionally tilled
 - Review found 65% of cropland was under residue management system.
 - Sediment and P from cropland overestimated in baseline.
 - Incorrectly focused much of 80% reduction of P on increased residue management on cropland.

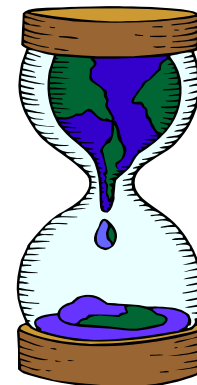
Planning Uncertainty



- Aquatic System Response – Lag Time
 - Time elapsed between adoption of management changes and detection of measurable improvement in water quality in target waterbody.
 - Uncertainties introduced by lag time:
 - Time required for installed practice to produce desired effect
 - Time required for effect to be delivered to receiving water
 - Time required for waterbody to respond to effect.

Lag Time

- Range of reported lag times between treatment and response
 - <1 year for stream nutrients and indicator bacteria to respond to livestock exclusion
 - 10 years for macroinvertebrates to respond to treatment of mine drainage
 - 10 – 50 years for stream nitrate levels to respond to improvements in agricultural nutrient management.



Planning Uncertainty

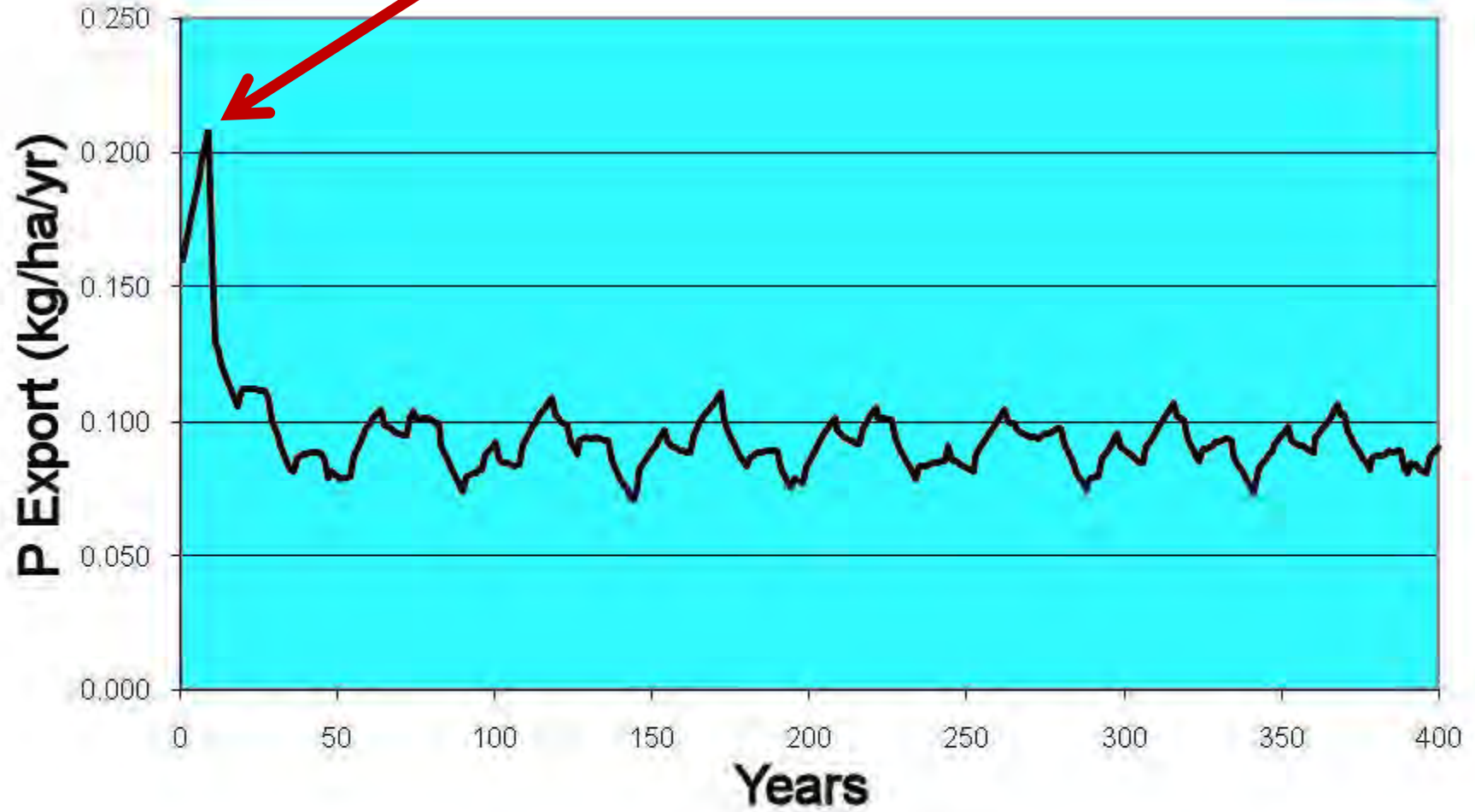
- Weather and Flow



More Flow = Greater NPS Load



Management Measures
Implemented in Year 10



Meals et al 2008

Planning Uncertainty



- Land Use and Management Changes
 - Urbanization: affected by local, national, or even global economy;
 - Federal, State, or municipal planning, zoning, and regulation may radically change the way stormwater is managed;
 - Demand for ethanol or other biofuels: expanded corn acreage, including conversion of CRP land
 - Influence of commodity programs: e.g., the dairy herd buy-out in the 1980s, changing tillage, crop rotations, or animal density across large areas;

Planning Uncertainty

- Land Use and Management Changes (cont.)

- Changes in animal agriculture :

- Dairies moving from grazing to total confinement
- Dairies changing from daily manure spreading to manure storage
- May alter extent and timing of livestock waste applications



- Food supply contamination: e.g., *E. coli* outbreak in spinach changed potential for land application of animal waste and stimulated waste composting and treatment;
- Environmental disasters such as BP oil spill or emerging long-term environmental issues such as hypoxia may redirect technical, political, and financial resources to different regions or different land uses as remediation efforts proceed.

Planning Uncertainty

- Uncertainty regarding behavior of people.
 - Which are contributing to the problem?
 - Who will step forward to address problems?
 - What will be done by those who step forward?



Disproportionality hypothesis: *A small proportion of inappropriate management behaviors in vulnerable time or space cause a disproportionate amount of the degradation in any agroecological system.*

- ~60% TP load from 16% of fields in WI watershed managed by 8 of the 61 land managers.
- Design remedial solutions after learning why these inappropriate behaviors are occurring.

Implementation Uncertainty

- Planned BMPs may be superseded by improved practices or shown to be ineffective or worse, e.g.,
 - Conservation tillage may lead to stratification of nutrients or pesticides in upper soil layers, leaving them more vulnerable to runoff losses;
 - Riparian buffers without the capacity to ensure sheet flow may be short-circuited by concentrated overland flow;
 - Tile and ditch drainage now shown to have deleterious effect; new conservation drainage practices are under development.

Implementation Uncertainty

- Urban infrastructures can fail or decline at any time:

- Recent gas explosion in California
- Multiple dam and levee failures due to heavy rains
- Broken water mains and sewer pipes
- Need to address these events to achieve watershed goals
- Fairfax County, VA, owns and must:

- **Maintain:**

- >1,500 miles of pipe and paved channels
- 42,000 stormwater structures
- 1,300 stormwater management facilities
- 18 state regulated dams

- Inspect ~3,000 private stormwater management facilities

Implementation Uncertainty

- Short-term weather patterns (e.g., wet, drought) can:
 - Influence agricultural management (e.g., fallow cropland, failed crops, changes in crop rotations)
 - Stress municipal stormwater management facilities
 - Influence pollutant loads (even with BMPs).
- Long-term climate change (e.g., more frequent and larger storm events) can threaten roads, drainage systems, dams, etc. in new & unpredictable ways.
- Federal, state, and local elections can result in major changes in:
 - Regulatory environment
 - Conservation programs
 - Commitment of resources to address watershed needs



Implementation Uncertainty

- Economic pressures, corporate lobbying, public I&E campaigns, and social movements can broadly influence human behavior and change management of land and activities associated with pollutant loads.
 - When “being green”
 - Agrichemical manufacturer’s disputing claims of leaching problems may derail efforts to change pesticide use (e.g., MO CEAP)
 - Major reductions in milk or crop prices can decrease producers’ ability and willingness to adopt conservation practices
 - Economic downturns leading to budget cuts can cause delays in upgrading stormwater or wastewater infrastructure.

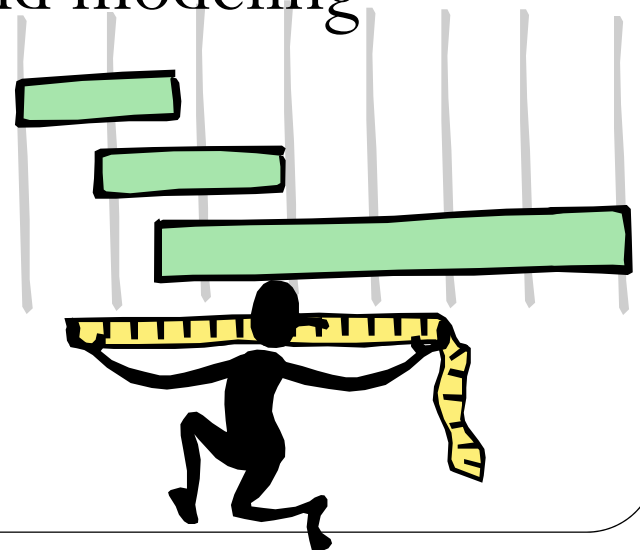


Progress Assessment Uncertainty

- Same uncertainty issues as for assessment

BUT

- Change detection requires greater sensitivity
- Applies to both monitoring and modeling



Cumulative Uncertainty

Assessment Uncertainty + Planning Uncertainty +
Implementation Uncertainty + Progress Assessment
Uncertainty \neq Total Uncertainty

or

Assessment Uncertainty X Planning Uncertainty X
Implementation Uncertainty X Progress Assessment
Uncertainty \neq Total Uncertainty



Cumulative Uncertainty

- So what *IS* the cumulative uncertainty?
- We are uncertain, but
 - Should consider how these uncertainties might inter-relate (i.e., combine and propagate through system)
 - Seems unlikely that source ID uncertainty and lag time uncertainty would cancel?
 - Assessment and implementation uncertainty are probably at least additive?
 - Hence, the Margin of Safety (MOS) in TMDLs...

Cumulative Uncertainty

- Can't quantify all terms of uncertainty
 - Potential land use change
 - Social forces
- Can quantify some sources
 - Predictions of weather, flow, pollutant measurements, load calculations



Recommendations

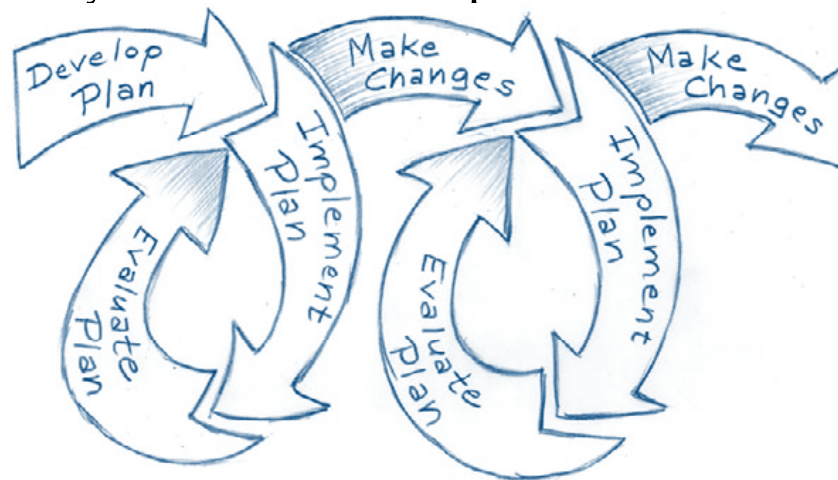
- **Acknowledge it.** Be clear with the public and other stakeholders that uncertainty exists and results may not be exactly as hoped or flat-line stable
- **Prepare for it.** In the assessment phase, conduct effective investigations of the causes and sources of the water quality impairment before beginning an implementation effort.
- **Quantify it.** Use existing data to quantify and understand variability in natural world, pollutant generation, BMP performance
The Data Uncertainty Estimation Tool for Hydrology and Water Quality (UDET-H/WQ) (Harmel et al 2009)

Recommendations

- **Model it.** Acknowledge uncertainty in modeling procedures and results and use appropriate procedures (e.g., Monte Carlo) to estimate the effects of uncertainty.
- Physical-based modeling should include the human dimensions of land management (e.g., the influence of human behavior on BMP effectiveness) to adequately consider uncertainty in outcomes.

Recommendations

- Loading reduction targets should incorporate components that address acceptable variability in short and long-term source allocations.
 - e.g., 15% if adaptive management factored in
 - e.g., >15% if adaptive management NOT included
 - Concentration-based goals must account for the variability in the natural system and its response to treatment.



Recommendations

- **Track it.** Effective water quality and land use monitoring tells you where you are and allows for mid-course corrections.
- Use minimum detectable change (MDC) to estimate the monitoring frequency needed to detect:
 - The load reduction required by the TMDL
 - Interim reductions that trigger adaptive management actions

Recommendations

- **Accommodate it.**
 - Use the best available scientific principles and data
 - Use MDC and other techniques to guide monitoring and evaluation programs
 - Use reasonable – but not excessive – MOS
- **Wait for it.** Accept the notion of lag time and adjust expectations accordingly.
- **Adapt to it.**
 - Use a nimble and flexible planning and implementation process so that the inevitable surprises do not derail the program
 - Use adaptive management principles, supported by good information

Costs of Not Addressing Uncertainty

- Errors in problem assessment
- Errors in planning
- Implementation of wrong BMPs
- Excessive costs to achieve goals
- Anger, Confusion and frustration
 - Those who need to implement controls
 - Those who would benefit
- Failure to achieve water quality objectives
- Decreased funding support



References

- California Regional Water Quality Control Board. 2004. Total maximum daily loads for bacteria Malibu Creek Watershed. RWQCB, Los Angeles, CA.
<http://www.epa.gov/waters/tmdl/docs/MalibuBacti%20TMDL%20Staff%20Report.pdf>
- ENSR. 2009. Maine statewide bacteria TMDL. Report # DEPLW-1002. Report prepared for Maine Department of Environmental Protection.
<http://www.maine.gov/dep/blwq/docmonitoring/TMDL/2009/report.pdf>
- Evans, R.E. and D.H. Schnepfer. 1977. Sources of suspended sediment: Spoon River, Illinois.. Proceedings of the North-Central Section of the Geological Society of America, Peoria, IL, pp.592-593
- Fairfax County. 2009. Fairfax County stormwater service district,
<http://www.fairfaxcounty.gov/dpwes/publications/stormwater/servicedistrict.pdf>
(retrieved October 19, 2010).
- Gilbert, R.O. 1987. Statistical methods for environmental pollution monitoring, Van Nostrand Reinhold Company, Inc., New York, 320 pp.
- Harmel, R.D., D.R. Smith, K.W. King, and R.M. Slade. 2009. Estimating storm discharge and water quality data uncertainty: A software tool for monitoring and modeling applications, Environmental Modelling & Software 24: 832–842.
- Harwood, V.J., A.D. Levine, T.M. Scott, V. Chivukula, J. Lukasik, S.R. Farrah, and J.B. Rose. 2005. Validity of the indicator organism paradigm for pathogen reduction in reclaimed water and public health protection. Appl. Environ. Microbiol. 71(6):3163-3170.

References

- MACC. 1999. The Macatawa watershed project: nonpoint source phosphorus reduction plan for the Macatawa watershed 1999-2009, Macatawa Area Coordinating Council , Holland, MI, 85 pp. <http://www.the-macc.org/wp-content/uploads/2009/04/Macatawa-Watershed-Phosphorus-Reduction-Implementation-Plan1.pdf>
- MA DEP, ENSR, and USEPA Region I. 2009. Final pathogen TMDL for the Buzzards Bay watershed, March 2009 CN: 251.1
- MDE.2010. Listing methodology for identifying waters impaired by bacteria in Maryland's integrated report, Maryland Department of Environment, http://www.mde.state.md.us/assets/document/Bacterial_Listing_Methodology_2010.pdf (retrieved October 13, 2010).
- MDE and VDEQ. 2009. Final total maximum daily loads of fecal coliform for the restricted shellfish harvesting/growing areas of the Pocomoke River in the Lower Pocomoke River Basin and Pocomoke Sound Basin in Somerset and Worcester counties, Maryland and Accomack County, Virginia. Maryland Dept. of Environment and Virginia Dept. Environmental Quality, Approved April, 2009. http://www.mde.maryland.gov/assets/document/TMDL_Pocomoke_River_032409_final.pdf

References

- Meals, D.W. 2001. Lake Champlain Basin agricultural watersheds Section 319 national monitoring program project, final project report: May, 1994-September, 2000. Vermont Dept. of Environmental Conservation, Waterbury, VT, 227 p.
- Meals, D.W., E.A. Cassell, D. Hughell, L. Wood, W.E. Jokela, and R. Parsons. 2008. Dynamic spatially explicit mass-balance modeling for targeted watershed phosphorus management, II. Model application. *Agriculture, Ecosystems and Environment* 127:223–233.
- Meals, D.W., S.A. Dressing, and T.E. Davenport. 2009. Lag time in water quality response to best management practices: A review, *Journal of Environmental Quality*, 39(1): 85-96.
- Merriman, K.R., M.W. Gitau, and I. Chaubey. 2009. Tool for estimating best management practice effectiveness in Arkansas. *Applied Engineering in Agriculture* 25(2):199–213.
- NCSU. 2009. Section 319 national monitoring program projects 2009 summary report, NCSU Water Quality Group, Raleigh, NC.
<http://www.bae.ncsu.edu/programs/extension/wqg/319monitoring/09rept319/index.htm>
- NCSU. 2010. Waukegan River Illinois national nonpoint source monitoring program project, NWQEP Notes No. 133:1-18, NCSU Water Quality Group, Raleigh, NC.
http://www.bae.ncsu.edu/programs/extension/wqg/issues/notes133_waukegan.pdf

References

- Nowak, P. and L. Ward-Good. 2010. Testing the disproportionality hypothesis in the Pleasant Valley Watershed, Managing Agricultural Landscape for Environmental Quality II, Soil and Water Conservation Society, April 28-30, 2010, Denver, Colorado.
http://www.swcs.org/documents/filelibrary/malii/MAL_II_Final_ProgramAbstract_Book_wC_7E7AEC87CD111.pdf
- Rhode Island Department of Environmental Management. 2008. Total maximum daily load for Point Judith Pond waters: pathogen/bacteria impairments, Office of Water Resources, RIDEM, Providence, RI.
- Richards, R.P. and J. Holloway. 1987. Monte Carlo studies of sampling strategies for estimating tributary loads. *Water Resources Research* 23:1939-1948.
- Roseboom, D. P. and W. White. 1990. The Court Creek restoration project, Proceedings of Conference XXI, International Erosion Control Association, Erosion Control: Technology in Transition. Washington, DC, February 14-17, 1990. 25-49.
- Spooner, J., C.J. Jamieson, R.P. Mass, and M.D. Smolen. 1987. Determining statistically significant changes in water pollutant concentrations. *Lake and Reservoir Management*, 3:195-201.

References

- Uhrich, M.A. and H.M. Bragg. 2003. Monitoring instream turbidity to estimate continuous suspended-sediment loads and yields and clay-water volumes in the Upper North Santiam River Basin, Oregon, 1998–2000, Water-Resources Investigations Report 03–4098, USDO, USGS.
- USFDA. Guide for the control of Molluscan shellfish 2007, US Food and Drug Administration, <http://www.fda.gov/Food/FoodSafety/Product-SpecificInformation/Seafood/FederalStatePrograms/NationalShellfishSanitationProgram/ucm046353.htm> (retrieved October 13, 2010).
- Walker, W.W. 2001. Quantifying uncertainty in phosphorus TMDL's for lakes. New England Interstate Water Pollution Control Commission and U.S. Environmental Protection Agency Region 1, Lowell, MA.
- Wall, D.B., M.G. Evenson, C.P. Regan, J.A. Magner, and W.P. Anderson. 1992. Understanding the groundwater system: the Garvin Brook experience, IN: Seminar Publication – The national Rural Clean Water Program Symposium, EPA/625/R-92/006, U.S.EPA, pp. 59-70.