

1 **Increasing Effectiveness and Reducing the Cost of Non-Point Source Best Management**
2 **Practice Implementation: Is Targeting the Answer?**

3 **I. Introduction**

4 As the Chesapeake Bay Program (CBP) passes the mid-point assessment, point source
5 discharges will have achieved (or nearly achieved) their final Total Maximum Daily Load (TMDL)
6 nitrogen (N) and phosphorus (P) wasteload allocations. Jurisdictions, however, still need to
7 achieve substantial nutrient and sediment reductions from agricultural and urban nonpoint
8 sources. Based on current understanding and modeling, the CBP estimates that agriculture and
9 urban nonpoint sources need to achieve an additional 35 million and 12 million pounds of N
10 reductions, 1.3 and 0.6 million pounds of P reductions, and 941 and 594 million pounds of
11 sediment, respectively, to meet TMDL goals. State and local governments are poised to spend
12 hundreds of millions of additional dollars to meet these goals, primarily by installing nonpoint
13 source best management practices (BMPs).

14 Thus, BMP implementation stands at the center of efforts to meet TMDL requirements. Yet,
15 water quality monitoring suggests that the link between BMP implementation and load
16 reductions is tenuous at best. The CB watershed model estimates substantial reductions in
17 agricultural loads, but monitoring data suggests little to no change in these loads between 1992-
18 2012 (Keisman et al. 2018). In a recent STAC review, Keisman et al. (2018) state “current
19 research suggests that the estimated effects of conservation practices have not been linked to
20 water quality improvements in most streams.” This is a familiar outcome. In general detecting
21 observed changes in ambient conditions from nonpoint source control efforts is a challenge
22 common across the country (Osmond et al 2012; Perez 2017).

23 A critical question is why? Potential explanatory factors include inadequate BMP coverage, poor
24 implementation/maintenance, lag times between implementation and water quality response,
25 inadequate participation, and inability to target BMPs to critical pollutant source areas (Easton et
26 al. 2017). Improved targeting of nonpoint source controls to areas with high pollutant loss rates
27 (both at the field and watershed level) is often proposed as a way to produce better outcomes
28 (Shortle et al. 2012; Perez 2017; Osmond et al 2012).

29 Many studies have noted that areas of high nutrient loss are site specific and highly localized. If
30 BMPs tend to get applied in lower risk areas rather than targeted to areas where nutrient loads
31 are more likely to originate, nutrient load reduction effectiveness will be overestimated. Many
32 studies suggest that between 5 - 20% of the land area generates 50-90% or more of the

33 nonpoint source loads (NPS), particularly for pollutants such as P and sediment (Heathwaite et
34 al. 2000; White et al. 2009; Qui, 2009; Wagena and Easton, 2018; Rao et al. 2009; Yu et al.
35 2019). In the Chesapeake Bay watershed, 80% of cropland loses less than 40 lbs/acre of N per
36 year, while the remaining 20% loses up to 300 lbs/acre (USDA, NRCS, 2011a). Losses may
37 also originate from a disproportionate share of farms that lack effective nutrient management.
38 Within fields, nutrient losses may be confined to relatively small areas (Easton et al. 2008a), that
39 with the correct targeting and incentives may be treated at relatively low cost. Yet few NPS
40 implementation programs have been designed to identify and treat high pollutant loss areas,
41 including those in the Chesapeake Bay watershed. NPS implementation programs typically
42 apply BMPs and other treatment measures based on factors including the willingness of
43 landowners to participate, access to sites, and distribution of financial incentives. In addition,
44 some programs cannot or do not identify and credit treatment of high impact areas. For
45 instance, modeling capacities may not be spatially or analytically refined enough to identify
46 localized areas of high loss and by extension areas that would be critical to target with BMPs.

47 Numerous studies have found that targeting NPS reduction projects to sites with higher pollution
48 potential and low implementation costs has the potential to improve cost effectiveness of
49 pollution reduction efforts (Carpentier et al 1998; Khanna et al. 2003; Yang and Weersink 2004;
50 Yang et al. 2005; Giri et al. 2012; Perez 2017; Xu et al. 2019; Fleming et al. 2019). Studies have
51 shown that targeting BMPs or a land retirement payment scheme by flow paths, sub-catchment,
52 soil erodibility, or other land and soil characteristics instead of applying BMPs randomly or
53 uniformly can reduce costs of meeting a given water quality goal (Yang and Weersink 2004).
54 Multiple policy designs could be pursued to better target cost-effective nonpoint source
55 reduction investments, each with different strengths and limitations (Ribaudo 2015).

56 Can targeting of nonpoint source controls be improved to get more pollutant reductions for less
57 cost in the Chesapeake Bay region? In general, targeting programs must answer two basic
58 questions: how pollutant loads are identified/quantified and how are stakeholders motivated to
59 cost-effectively identify and reduce NPS loads? There is a multitude of ways these two simple
60 questions can be answered. Selecting among the wide range of possible answers to these two
61 questions is a critical challenge and one in which this workshop will attempt to provide insight.

62 The objectives of this synthesis are 1) to summarize the range of options available for identifying
63 high loss areas and measuring the effectiveness of nonpoint source control measures; 2) to
64 identify and summarize incentive and behavioral approaches to encourage decision-makers to
65 adopt cost-effective treatment options; 3) to summarize the criteria that define success of such

66 programs, and 4) to describe the design and outcomes of several targeting programs that have
67 been piloted or implemented. This document is intended to provide background information and
68 resources and serve to facilitate discussion and consideration of targeting at the workshop.

69 **II. What is Targeting?**

70 “Targeting” in voluntary nonpoint source control programs is a widely used term that can
71 describe a diverse range of program designs. For the purposes of this workshop/synthesis
72 targeting is defined in three dimensions, 1) targeting landscape NPS areas that produce
73 disproportionate loads, 2) incentivizing people to treat those loads with NPS control measures,
74 and 3) selecting the most cost-effective NPS control measures to treat those areas. Targeting
75 may occur at different spatial scales, ranging from the watershed, field level, or subfield level.
76 Targeting may also mean identifying land managers whose managed lands produce
77 disproportionately high loads and providing additional assistance and incentives to successfully
78 manage those loads.

79 In general targeting is undertaken to improve the effectiveness of nonpoint source control
80 investments and to reduce the costs of achieving any given amount of pollutant abatement (cost
81 effectiveness). Targeting most frequently occurs at the watershed and subwatershed levels.
82 Geographic targeting of impaired, high pollutant loss, or environmentally risky/sensitive
83 subwatersheds to address water quality issues has been used in several USDA conservation
84 efforts over the years and is used in the CBP to prioritize high loss land river segments. The
85 Rural Clean Waters Program (1980s) and the President’s Water Quality Initiative (1990s) are
86 two examples. The USDA Environmental Quality Incentives Program (EQIP) targets ecologically
87 important areas (e.g., Chesapeake Bay and western Lake Erie) and incorporates ranking criteria
88 in selecting contracts at the local level. However, other programs may merely prioritize the
89 implementation of particular practices thought to be particularly effective in reducing pollutants.
90 For example, Maryland emphasizes the implementation of cover crops. Virginia has adjusted
91 cost-share arrangement to prioritize stream fencing. Pennsylvania is currently focusing on forest
92 riparian buffers through the Keystone Ten Million Trees partnership (<http://www.tenmilliontrees.org/>).
93 While these are laudable goals and aimed at trying to reduce the cost of NPS control, they
94 are not in a strict sense targeting.

95 Within the confines of the existing Chesapeake Bay Program modeling and accounting system,
96 targeting is essentially limited to the land river segment level. Differential pollutant losses and
97 nutrient reduction credit at the field and subfield level are not currently recognized. Furthermore,

98 it is difficult to identify and receive credit for working with land managers that contribute
99 disproportionate loads. The questions confronting nonpoint source water quality managers are,
100 can more refined targeting improve program outcomes (load reductions, cost savings, etc) and if
101 so, how can this be accomplished in the Chesapeake Bay region?

102 **III. Defining Success in Targeting Programs**

103 The criteria for evaluating the success of a targeting program represents an important
104 consideration, regardless of the particular program design. In the context of NPS load
105 reductions, the primary objective of a targeting program is to secure more pollutant reductions
106 for any given amount of effort or resources. Given the primary objective, examples of useful
107 evaluative criteria include achievement of stated objectives, cost effectiveness, participation,
108 certainty, administrative costs and burdens, and equity and fairness.

109 *Achieving Nonpoint Source Load Reductions/Water Quality Objectives.* While it is perhaps
110 obvious, the overriding goal of targeting is to secure reductions in nutrient and sediment loads.
111 As stated in the introduction, achieving demonstrative results in this area of NPS control is a
112 vexing policy challenge. A premise of targeting is that identifying, managing, and treating high
113 loss areas will generate greater reductions. If effective, these efforts should produce observable
114 changes in ambient outcomes.

115 When considering the overall effectiveness of a targeting program in achieving load reductions it
116 is necessary to consider the total system changes stimulated by the policy. Water quality
117 managers must consider unintended behavioral consequences of focusing on high loss areas.
118 For example, will such a focus inadvertently reduce effort in less critical areas? Similarly, how
119 will larger incentive payments targeted to high loss areas affect behavior within those areas?¹ .

120 *Cost Effectiveness.* Cost effectiveness can broadly be defined as the total cost per unit of
121 pollutant reduced (e.g. dollars spent per kg of N, P, or sediment), and a policy that improves
122 cost effectiveness is one that will achieve the most pollutant load reduction for a given budget.
123 Costs include not only expenditures to install or construct a pollutant control practice but also

¹ Slippage or leakage is a concern of any voluntary incentive program. In the context of NPS pollution, this refers to the tendency of incentive payments for practices that reduce load on high loss areas (e.g. no-till or manure storage) to make intensive production models relatively more profitable within those areas, in comparison to alternative land uses. For example, payments for practices that reduce erosion and nutrient loss on marginal land will make intensive crop production on that land relatively more attractive, in comparison to more environmentally benign land uses like perennial hay or pasture (Lichtenberg and Smith-Ramirez 2011). Because intensive crop production produces greater NPS runoff in comparison to perennial grasses--even when it is treated with conservation practices--slippage will lead to worse environmental outcomes when it occurs (Fleming et al. 2018). The consequences of targeting programs on the entire system should be considered, in order to secure the actual load reductions that are intended.

124 other opportunity costs to private citizens such as reduced production, forgone land use, etc.
125 Decision-makers must have the ability and knowledge to select combinations of BMPs that
126 match perceptions of stakeholders and reduce the most pollutants at the lowest possible cost.
127 Cost effectiveness also requires the identification and participation of stakeholders within a
128 watershed who can reduce the largest pollutant load at the lowest possible cost.

129 Since targeting necessarily includes some criteria of improved efficiency--i.e. more load
130 reductions per unit of effort, per project implemented, per land area treated, and so forth--
131 improved cost effectiveness can be considered an overarching goal of targeting programs by
132 definition. Moreover, absent large increases in funding levels, the only way to achieve more
133 NPS reductions is to get more out of the nonpoint source programs currently available. Thus,
134 cost effectiveness is critical to overall program success.

135 Participation. For voluntary conservation programs, landowner participation is critical. Even
136 when the best targeting program is devised, cost-effectiveness may be limited when farmers or
137 landowners do not participate in conservation programs (non-participation) or stop using
138 practices after the end of a conservation program contract or the life of the practice (dis-
139 adoption) (Claassen et al. 2008; Just and Horowitz 2013). The level and type of participation
140 both matter to program effectiveness. Not only does the level of participation matter (ex. #
141 landowners), *who* participates also matters to program success. Just as there is spatial
142 variability of loads across the watershed, there is variability in the effort and motivation of land
143 managers. A nonpoint source control policy that solicits high levels of participation from the
144 same set of conservation-minded landowners may not produce large or inexpensive reductions
145 because each added BMP is treating a smaller and smaller remaining load. However, a
146 nonpoint source program that can involve land managers of operations with particularly large
147 pollutant loads, or those that have little experience adopting conservation practices, may be
148 able to produce larger and less costly reductions.

149 A critical challenge in voluntary incentive programs is ensuring that funds induce *more*
150 participation. When landowners receive payments for practices that they would have adopted
151 without a payment (non-additionality), no new participation in conservation activities is achieved.
152 This problem has been shown empirically to have substantial effects on both the changes in
153 water quality that can be attributed to a program, as well as the program's cost-effectiveness
154 (Chabe-Ferret and Subervie 2013; Mezzatesta et al. 2013). However, the size and scope of
155 non-additional payments vary across different NPS practices (Claassen et al. 2018).

156 To address the challenges related to landowner participation, there are often trade-offs between
157 program goals. For example, increasing incentive payments to encourage greater participation
158 rates will also increase the profitability of existing production models, thereby encouraging
159 slippage (Fleming et al. 2018). Setting stricter baseline requirements for conservation behavior
160 on a farm as a condition for program participation--in order to reduce non-additional adoption--
161 will also tend to reduce participation rates (Just and Horowitz 2013). Moreover, landowners may
162 be able to shift baseline levels of practice adoption on their farms to take advantage of payment
163 programs (Bosch et al. 2013).

164 Certainty. The degree of certainty with which water quality improvements are achieved is
165 another necessary consideration when evaluating the success of targeting programs. In
166 general, NPS actions that improve certainty of outcomes are preferred. NPS control efforts are
167 often modeled rather than measured, since many types of NPS losses (e.g., sediment and
168 nutrient runoff from agricultural fields, N leaching to groundwater) are difficult, costly, or even
169 impossible to measure. Modeling introduces a considerable amount of uncertainty in the
170 estimates (e.g., uncertainty related to input parameters, model processes, and system
171 variability). Thus, estimates of cost and NPS control effectiveness can vary widely based on the
172 assumptions used. To allow for meaningful comparisons of pollutant control effectiveness
173 across programs and practices, analyses of NPS control cost-effectiveness should provide
174 greater transparency in the assumptions and sources of uncertainty underlying the estimates
175 (Wieland et al. 2009; Chesapeake Assessment Scenario Tool (CAST) 2019; Fleming 2019).

176 While uncertainty exists in estimating nonpoint source loads and control effectiveness, can
177 targeting programs increase the level of certainty in pollutant control performance over
178 outcomes that would be achieved under the status quo policy? Targeting programs may result
179 in greater confidence in outcomes, given their emphasis on identifying and, to the extent
180 possible, measuring and monitoring water quality effects.

181 Administrative Costs & Burdens. Another critical aspect of targeting is administrative cost.
182 Participation and outcomes are improved when participants can identify reduction opportunities
183 and adjust management at modest costs. In general, better targeting requires landowner
184 outreach, resources to predict and measure outcomes, time to consider and evaluate options,
185 and technical support. Yet, effort comes at a cost. Tradeoffs may exist between increasing
186 targeting complexity and the time and compliance costs to participate.

187 Equity & Fairness. All else equal, programs perceived as fair generate more interest,
188 participation and support. Different targeting program designs will produce different distributions
189 of resources and benefits. Targeting of an impaired sub-watershed may involve higher payment
190 rates to landowners in that watershed, reflecting the greater potential benefits to be achieved in
191 that area. However, differential payment rates to landowners in different areas may lead to
192 political push-back from those receiving the lower payment rates, thus jeopardizing public
193 support for the program. For example, the USDA's Water Quality Incentives Program (WQIP)
194 targeted specific watersheds for funding, and the program was discontinued in part due to
195 political resistance to these differential payments. Targeting programs should be designed and
196 evaluated in consideration of their fairness and distributional impacts, which will ultimately
197 impact the viability of these programs.

198 **IV. Elements of Targeting Programs**

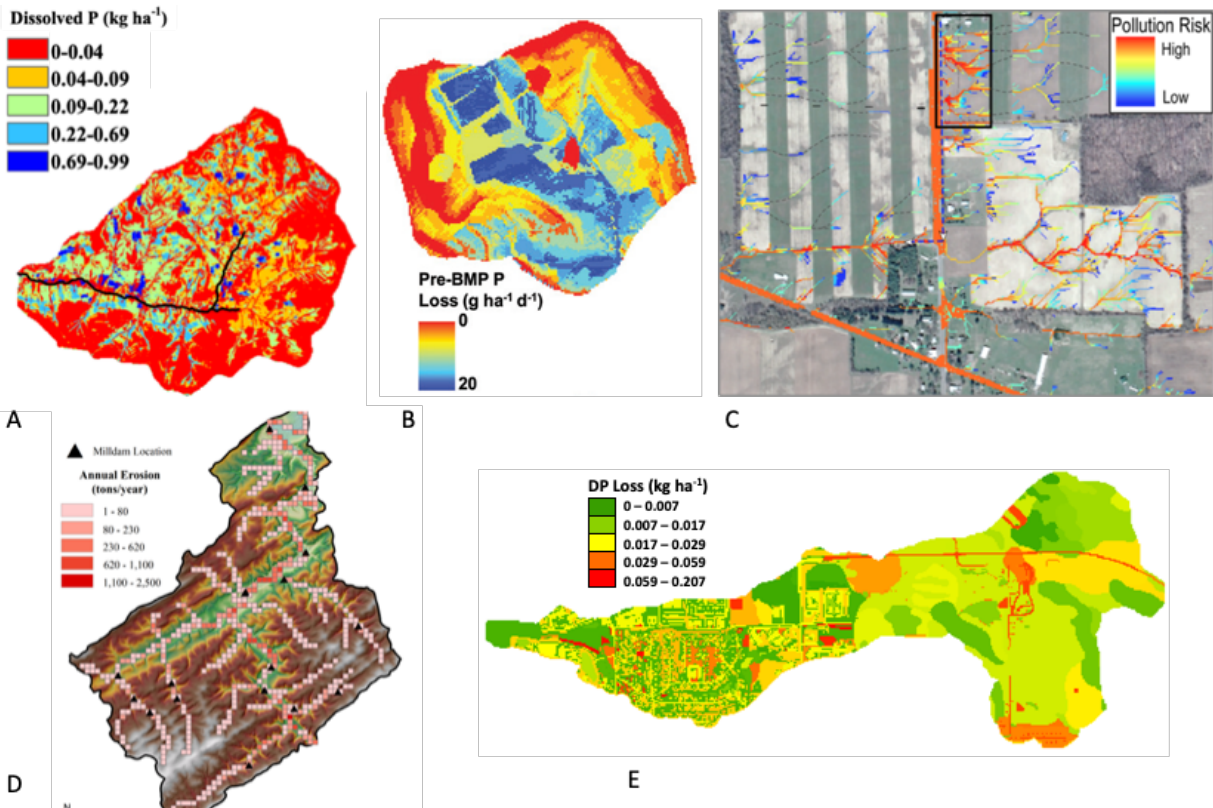
199 Section III outlined the primary goals for designing nonpoint source programs. This section will
200 outline the tools and targeting design options available to achieve these outcomes. This will
201 include both technical options for identifying and measuring the effectiveness of controls to
202 reduce high NPS pollution loads (IV.A) and policy design options for reducing these loads within
203 a framework of voluntary landowner participation (IV.B).

204 **A. Targeting/Identification of Pollutant Source Areas**

205 *i. Introduction/Challenge*

206 The need for identification and spatial targeting of landscape areas generating disproportionate
207 NPS pollution losses is driven by the heterogeneity of pollution sources and transport pathways.
208 Figure 1 illustrates that differences in pollution generation over orders of magnitude can occur
209 across small spatial domains and are driven by hydrology (Fig. 1a), land use/soils (Fig. 1b,e),
210 terrain (Fig. 1c), and morphometric features (Fig. 1d) . Approaches to identify these NPS
211 pollution "hot spots" or "critical source areas" (CSAs) can depend on the pollutant, its transport
212 pathway, and the geographical scale of targeting. We define CSAs broadly to include all
213 source/pathway combinations generating disproportionately high NPS pollution loads. We
214 describe available approaches for targeting CSAs (IV.A.ii), how their applicable spatial scales
215 and data requirements differ (IV.A.iii), and how BMP performance variability can affect targeting
216 strategies (IV.A.iv).

217



218

219 Figure 1. Examples of spatial heterogeneity and different targeting approaches at various
 220 scales: landscape hotspots of phosphorus (P) loss from agricultural watersheds at 37 km² (A)
 221 and 1.6 km² (B) scales, variable landscape connectivity over several farm fields of ~5 ha (C),
 222 streambank erosion heat map across a ~40 km² watershed (D), and dissolved P loss in a 3.3
 223 km² urban watershed (E).

224 *ii. Modeled or Measured Approaches to Determining Target Areas*

225 Ecohydrological models are the most comprehensive but most computationally intensive
 226 approaches to characterizing NPS pollution generation and transport. Depending on the
 227 geographical area of interest, these process-based models can identify priority subbasins
 228 (Rabotyagov et al. 2010), hydrologic response units (coincidence of land use/management,
 229 slope, and soil properties, Rodriguez et al. 2011), or even areas within an individual farm fields
 230 (Easton et al. 2008a). Examples of such models include the Agricultural Policy / Environmental
 231 eXtender (APEX), SPAtially Referenced Regression On Watershed attributes (SPARROW), Soil
 232 and Water Assessment Tool (SWAT), and extensions of SWAT including SWAT-VSA (variable
 233 source area) and SWAT/HUMUS (Hydrologic Unit Model of the United States) or other
 234 integrated modeling approaches. One advantage of ecohydrological models is that they can be
 235 used to identify CSAs of N, P, and sediment simultaneously. Additionally, the effects of BMP
 236 implementation on pollutant loading to target water bodies can be simulated, and the impacts of

237 climate change or landuse change on water quality and the efficacy of BMPs can be evaluated.
238 However, some limitations of these models include their inability to adequately capture stream
239 bank erosion, which is an important source of sediment, lag times between BMP implementation
240 and water quality improvements, and groundwater processes, which can be a significant source
241 of N in baseflow (causing a lagged water quality response to management changes).
242 Furthermore, Osmond et al. (2012) emphasizes that most models consistently overestimate
243 control effectiveness. There is also the need for sufficient data to calibrate and evaluate the
244 models and potentially significant degrees of uncertainty to consider.

245 Less computationally intensive approaches tend to rely on terrain metrics derived from Digital
246 Elevation Models (DEMs) overlaid with land use and management information and sometimes
247 combined with soils data. Targeting CSAs by Topographic Index (TI) has produced promising
248 results and improved prediction of pollutant delivery (see Figure 1 A & B) from diffuse sources
249 compared to approaches that do not consider topography, such as water body proximity
250 (Buchanan et al., 2014; Hahn et al., 2014; Easton et al., 2007a,b; 2008a,b; 2011; Schneiderman
251 et al., 2007). For example, Wagena and Easton (2018) demonstrated that 30% of agricultural
252 land in the Susquehanna River Basin, about 42% of the Chesapeake Bay watershed (71,000
253 km²), generated the majority of the agricultural NPS pollution. This conclusion was evidenced by
254 simulations with SWAT-VSA predicting nearly the same N, P, and sediment load reductions to
255 the Bay with BMP implementation on 30% of the agricultural land compared to 100% of the
256 agricultural land. In a study explicitly evaluating cost, Xu et al. (2019) found that targeting
257 hydrologically active areas, as defined by a terrain model, reduced the cost of achieving N load
258 reductions by 30-40% in a 7.3 km² watershed in Pennsylvania under current and future climate
259 scenarios.

260 Beyond simulation studies, the identification of CSAs may be accomplished using observable
261 indicators. Identification through observable indicators has historically been limited in
262 geographic scope and feasibility for NPS pollutants; however, improvements in the quality of
263 airborne light detection and ranging (LiDAR) data have made it possible to locate and quantify
264 stream bank erosion rates at watershed-scales and target CSAs with precision (Walter et al.
265 2017; Fleming et al. 2019). Stream bank erosion may now be the one NPS pollutant pathway for
266 which landscape-scale measurement data can be collected at reasonable costs. The
267 measurement of vertical and horizontal changes at fine levels of detail (sub-meter) is available
268 both through point cloud and digital elevation model (DEM) differencing in an approach referred
269 to as change detection (<http://gcd.riverscapes.xyz/>). Improved methodologies exist to account

270 for uncertainty and the presence of vegetation during leaf-season or in high-density wooded
271 areas (Wheaton et al. 2010, James et al. 2019). In addition to being scalable, change detection
272 can be done over long periods of time if LiDAR data are acquired during different years.
273 Practitioners and government agencies have a need for additional LiDAR data within key
274 watersheds to allow for comparisons across time.

275 In small watersheds, specific farmers or fields can be identified as CSAs using in-stream water
276 quality monitoring or field-level data collection. Field-level data collection can support
277 calculations of sediment loss or the P Indices. Nearly every state in the US has developed and
278 use P Indices to improve nutrient management by indicating agricultural fields with the highest
279 risk of P loss (Sharpley et al., 2003, 2008). P Indices are primarily based on P source
280 characteristics (fertilizer and manure composition, rate, timing and method of application) and
281 surface transport factors. In one example, targeting farms with the highest soil P Index values in
282 a 50 km² watershed resulted in a 55% reduction of in-stream storm flow P loads within four
283 years of practice adoption (Perez, 2017). In another case, specific fields were targeted by
284 collecting in-stream N measurements, moving sequentially upstream until high concentrations
285 were detected, and implementing riparian buffers on the adjacent farmland (Maille et al., 2009).

286 The difficulty in identifying the small percentage of land contributing disproportionately high NPS
287 loads has been emphasized in the Conservation Effects Assessment Project (CEAP) reports.
288 The Lake Erie CEAP report raised the issue that while soils are very heterogeneous and occur
289 as a mosaic in the landscape, many farms/fields are managed according to the dominant soil
290 type. In a case study of a field that is managed appropriately for the three soil types that
291 comprise 98% of the area, the remaining 2% of the land had high vulnerability to N, P, and/or
292 sediment loss that required additional control measures (NRCS, 2016). These vulnerable soils
293 would only be detected with strategic soil sampling (according to a grid or zone) and would likely
294 require precision agricultural practices to address their loss vulnerability (NRCS, 2016). The
295 report highlighted field-scale mapping of soil properties and variable rate nutrient application
296 technology as important components of managing small, discrete CSAs in the landscape,
297 particularly for addressing subsurface and soluble P losses (NRCS, 2016). An analogous
298 conclusion can be drawn with respect to site hydrology. Although hydrologically active areas
299 can often be identified within fields using terrain models, on the ground site assessment is
300 critical to detect unmapped artificial drainage features.

301 *iii. Effectiveness of Approaches*

302 1. Criteria

303 In the context of the Bay, targeting programs should focus on areas of the watershed that
304 deliver the greatest loads of a pollutant to the Bay, and not necessarily on where the largest
305 edge-of-field loads are generated. In the Chesapeake Bay watershed, water quality
306 improvement in small tributaries will be observable and attributable to targeted conservation
307 efforts much sooner than in the Bay itself. Lag times between practice implementation and
308 measurable improvements in water quality in receiving water bodies with large watersheds (e.g.,
309 Chesapeake Bay, Gulf of Mexico) are on the order of decades and make detecting measurable
310 changes in water quality difficult within short time frames. For this reason, it is important to set
311 interim water quality targets in smaller streams where water quality responds more quickly to
312 intervention. Perez (2017) provides an approximate time frame of 4-8 years for achieving
313 measurable and attributable water quality improvements in response to conservation efforts for
314 watersheds up to about 400 km², based on an analysis of six “water quality targeting success
315 stories” that were part of the NRCS Regional Conservation Partnership Program. Therefore, it
316 may take years for water quality improvements to be realized from even the most scientifically
317 robust targeting programs.

318 2. Strengths and Weaknesses

319 Comparing the efficacy of methods to identify CSAs for treatment is complicated by several
320 factors. The accuracy of CSA identification using a particular approach depends on how well the
321 dominant pollutant sources and loss pathways are represented, the heterogeneity of the
322 watershed, data availability, and scale. Different identification approaches are more appropriate
323 in different scenarios. For example, collecting in-stream water chemistry measurements in a
324 small watershed may pinpoint specific farmland with high NPS contributions, but this approach
325 becomes increasingly costly and labor intensive as the watershed size increases. In contrast,
326 model-based approaches can be applied to much larger watersheds. Some models (e.g.,
327 SWAT) require extensive watershed data, including detailed information about existing land use
328 and management practices, while others, like terrain models, have relatively low data needs.
329 There are also differences in model complexity, data needs, and utility at the field scale. For
330 example, the soil P index has relatively modest data needs compared to process-based models,
331 like APEX, but cannot be used for identifying N or sediment losses. While a number of modeling
332 tools are geared toward identifying NPS pollution generated by surface processes, there is
333 increasing technological capacity to measure and identify streambank-derived pollution using
334 change detection tools such as point cloud or DEM differencing. Tool selection will depend on

335 which pollutants and loss pathways are prioritized. Table 1 summarizes tools available for CSA
 336 targeting and indicates their relative cost, relevance to different target pollutants, and data
 337 needs.

338 **Table 1.** Summary of modeling and physical options to guide targeting.

Options	Effort to Accomplish (H, M, L)	WQ Concern Addressed	Data Needs (H, M, L)	Scale
<u>Models</u>				
APEX	H	Hydro, WQ	H	Field
SWAT	H	Hydro, CSA, WQ	H	Sub-Field to watershed
P Index	L (conducted as part of NRCS 590 regs)	Primarily WQ (P)	M	Field
CB Model	H	Hydro, WQ	H	Watershed to region
Terrain models	L	Hydro, CSA, WQ	L	Sub-Field to watershed
Distributed models	H	Hydro, CSA, WQ	H	Pixel to watershed
<u>Physical</u>				
WQ measurements	H	Hydro, WQ	H	Various
Soil/tissue	H	nutrient mass balance	M	Sub-Field to field
Wet boot/eye test	L (although time intensive)	Hydro, CSA	L	Sub-Field to field

339 In the WQ Concern Addressed column, Hydro refers to hydrology, WQ refers to water quality in
 340 terms of N, P, and sediment loading, and CSA refers to identification of critical pollution source
 341 areas, and H, M, and L as High, Medium, and Low.

342

343 A few studies have explicitly compared different approaches to spatial targeting. One compared
 344 genetic optimization to simpler approaches previously applied in CEAP where target areas were
 345 defined by areas of moderate to high conservation need and projected that the former could

346 reduce the cost of intervention by half (Rabotyagov et al., 2014). Another compared four CSA
347 identification approaches based on targeting the highest pollutant concentrations in sub-
348 watershed reaches, total pollutant load from the reach, pollutant load per subbasin, or average
349 pollutant load per unit area (Giri et al., 2012). Notably, the most effective approach for reducing
350 sediment loads (targeting the highest load per subbasin) differed from that for reducing nutrient
351 loads (targeting land adjacent to stream reaches with the highest N and P concentrations), and,
352 somewhat surprisingly, targeting the highest pollutant load per unit area was not the best
353 approach.

354 Apart from the accuracy of targeting tools, their utility to watershed managers must be
355 considered with respect to the technical capacity of targeting program administrators. The
356 degree of sophistication necessary in targeting methodologies or tools to identify CSAs across
357 spatial scales remains an open research question. Targeting is most effective as a staged
358 approach in the conservation planning process, at the watershed scale to drive regional
359 prioritization or resource allocation, and down to the field scale to select and implement
360 appropriate BMPs.

361 *iv. Modeled and Measured Effectiveness of BMP Implementation*

362 1. Technical Aspects

363 Landowner BMPs options can be divided into several different classes. Numerous methods for
364 organizing BMP types have been utilized, and these include source vs. transport BMPs,
365 structural vs management BMPs, and typologies based on pollutant transport pathways. The
366 usefulness of these different organizing typologies largely depends on the context in which they
367 are applied. Source BMPs are those that aim to reduce the amount of nutrients introduced into
368 the system, while transport BMPs attempt to reduce the mobilization of nutrients or sediment by
369 altering hydrologic production. Structural BMPs are those that attempt to prevent or reduce the
370 discharge of pollutants in stormwater; many urban BMPs are structural, such as infiltration
371 basins and bioretention. Management BMPs, as the name suggests, are BMPs that alter some
372 form of management to prevent or reduce pollutant mobilization or transport; BMPs, such as no-
373 till and nutrient management plans (NMPs), are management BMPs.

374 BMPs can also be differentiated by the pollutant transport pathways that they address. This
375 allows landowner management options to be matched with the CSA identification tools
376 mentioned above. BMPs that address surface-pathway NPS pollution (runoff, erosion) include
377 conservation tillage, contour-strip farming, riparian buffers, and cover crops, as well as

378 production models that reduce erosion (e.g. grass-fed vs. feeding of commodity crops). BMPs
379 that address subsurface-pathways (leaching to groundwater) include cover crops, well-
380 established buffers, nutrient management plans, as well as changing inputs to reduce nutrient
381 application / deposition (e.g. fertilizer use, animal feed options). Finally, BMPs that address
382 mobilization of NPS pollutants in stream banks (sediment and associated nutrients) include
383 stream restoration, off-stream fencing for livestock, and legacy sediment stream or wetland
384 restorations.

385 Accounting for site-specific BMP performance is necessary to predict the impact of CSA
386 targeting and to compare the potential environmental outcomes of different targeting
387 approaches. For example, two locations may generate equivalent pollutant loads but have
388 different load reduction potentials due to their suitability for treatment with BMPs or greater
389 effectiveness of a particular BMP at one of the sites. Without predicting the effects of BMP
390 implementation at the two sites, they would be treated as equivalent in a targeting program
391 though the latter would provide an opportunity for more cost-effective treatment. Practice
392 effectiveness can be related to landscape characteristics and hydrology and is affected by the
393 conditions under which the practices are tested, including temporal features of seasonality,
394 climate patterns, and climate change (Ahmadi et al., 2014). Site-specific practice effectiveness
395 can be simulated using biophysical models (e.g., APEX, SWAT) and provide insight into which
396 practices or suite of practices perform better for a particular area or under particular conditions
397 (e.g., climate change projections). However, the lack of descriptive data for practices relating to
398 other factors affecting performance, namely design, implementation, and maintenance, is a
399 significant constraint.

400 2. Assumptions

401 Data needs stand at the center of targeting approaches. In order to effectively target, data--
402 either model derived or, ideally, measured--must provide contextual evidence of pollution
403 generating areas. The data required to develop and inform a targeting program must address
404 issues of source, scale, timing, and delivery. Spatial targeting by identification of CSAs using
405 landscape metrics (e.g., soil wetness index), high resolution digital elevation models or point
406 clouds (to determine streambank erosion rates), or ecohydrological models relies on the
407 availability and accuracy of data, such as soil characteristics, land use, LiDAR (light detecting
408 and ranging), and the location of existing BMPs. The latter has proven a perpetual challenge in
409 the absence of disaggregated and spatially explicit data for BMPs implemented with federal
410 cost-share (Kurklova et al. 2015). Having reliable baseline data--knowledge of the location and

411 operational status of existing BMPs--is essential for any targeting strategy. Spatial targeting
412 decisions based on biophysical simulations can only be as good as the data used to
413 parameterize such models and are dependent on the accuracy of pollutant generation,
414 transport, storage, and transformation processes. Strengths and weaknesses in these
415 representations differ across models, suggesting the value in pursuing multiple lines of evidence
416 or model ensemble approaches. One notable limitation shared across models predictive of
417 water quality is the representation of pollutant storage and resultant lag times in pollutant
418 delivery to target water bodies, which is discussed subsequently as a critical issue that needs to
419 be considered for targeting strategies (4.A.iv.3). All models are subject to the constraints of
420 incomplete data regarding land use and land management practices. Thus, sensitivity analysis
421 and explicit examination of model uncertainty must inform decision-making. Data tend to be the
422 most incomplete at farm or field scales, the scales at which critical targeting decisions are
423 made, and this has been identified as a major hurdle to spatial targeting (NRCS 2016;
424 Wardropper et al., 2015).

425 3. Problematic Issues in Targeting Programs

426 Several issues exist that could be problematic for any targeting program; specifically, the
427 nutrient mass balance in many regions of the watershed and the impact of lag-times in pollutant
428 delivery yielding legacy impacts. Efforts to address these two issues must be made in order for
429 a targeting program to be effective.

430 Nutrient Mass Balance. Large mass balance issues exist in many agricultural dominated regions
431 of the Bay (inputs of feed and fertilizer exceeding local assimilative capacity). Continued growth
432 in intensive animal agriculture has and will continue to compound this issue (Yagow et al.,
433 2016). However, targeted feed management has been shown to significantly reduce nutrient
434 excretions in manure and is thus a potential option for mitigating nutrient mass imbalances,
435 particularly in livestock intensive operations. In the New York City watershed, Ghebremichael et
436 al. (2009) demonstrated significant reductions in P excretions of 5.5 kg/cow/yr (about 23%)
437 when using a precision feed management strategy, with no reduction in herd productivity.
438 Targeting with respect to animal agriculture nutrient mass balances should focus on those herds
439 with excessive nutrient excretions as determined by nutrient content in the manure. More
440 generally, mass imbalance, at the field, farm or watershed scale, are difficult to control with
441 targeted BMPs, as there are very few that reduce nutrient input into the system.

442 Lag-times in Nutrient and Sediment Delivery. Legacy nutrients result from excess input of
443 anthropogenic nutrients and their subsequent accumulation and storage in soil, sediment, or
444 groundwater. Notably, nutrients leached through soils into groundwater may take decades to
445 eventually be discharged to surface waters. For example, the lag time of groundwater being
446 discharged into surface water in the Chesapeake Bay watershed has been identified as a
447 significant nutrient source (Easton et al., 2017; Lindsey et al., 2003; Phillips and Lindsey, 2003),
448 and can be characterized by lag times ranging from less than a year to more than 50 years
449 (Sanford and Pope, 2007; Meals et al., 2010). Sediment delivery can take even longer, largely
450 due to storage of sediment behind stream impediments, such as the numerous historic mill
451 dams that exist in the Chesapeake watershed (Walter and Merritts 2008; Yagow et al., 2013).
452 Understanding the impact of lag times is critical to setting expectations for water quality
453 responses to BMP targeting, because failing to account for these pollution sources can mask
454 the outcomes of targeting and cause a delay in their detection. Targeting areas with shorter lag
455 times could improve water quality more quickly but may sacrifice some cost efficiency in the
456 long term. Targeting shorter lag-times may also be justified on environmental grounds, as areas
457 with longer lag times may provide more opportunities for natural attenuation and ultimately
458 require less treatment.

459 **B. Decision Making**

460 A major challenge confronting voluntary targeting programs is motivating participants to put the
461 right control actions in the right place to achieve maximum water quality benefit. This challenge
462 is compounded by the physical reality of NPS pollution, which is extensive and heterogeneous
463 (Nowak, Bowen, and Cabot, 2006). Furthermore, farmers and landowners hold a variety of
464 different motivations and interests. Some participants may be strongly motivated by a
465 conservation ethic while others maybe more focused on financial returns (Ribaudo 2015).
466 Different incentive program designs can significantly impact who participates and is engaged in
467 pollution control efforts. For instance, financial incentive programs premised on sharing costs of
468 BMP installation may not motivate a subset of land managers to participate. Adding resources
469 to such a program may face diminishing results if new participants (potentially those with high
470 pollutant losses) are not motivated to act.

471 This section describes different targeting program design choices that structure and incentivize
472 landowners' choices to select and participate in nonpoint source reduction measures. This
473 discussion will assume questions related to how NPS outcomes can be identified and quantified

474 (see discussion above) have been addressed, and we will now focus on how program
475 participants' conservation choices can be structured.

476 *IV. B.1. Farmer/Landowner Choices Over NPS Control Options*

477 An important dimension for the cost effectiveness of targeting programs is degree of choice over
478 NPS control options given to decision-participants. Other factors equal, the more options a
479 participant has on how NPS can be controlled, the more cost effective the result. For instance, if
480 a landowner is offered only a few BMPs that may be used to control, more effective and lower
481 cost alternatives better tailored to the specific site or farm operation could be foregone. For a
482 targeting program, choice flexibility extends also to decisions about where control activities are
483 applied. For instance, targeting a few critical source areas of a farm operation may generate
484 large reductions in pollutant loads at relatively low costs. Requirements to treat all areas in the
485 farm operation, regardless of the pollutant contribution of these areas, would limit choice, and
486 reduce cost effectiveness.

487 However, offering more NPS control choices is not without tradeoffs. As the number of control
488 options increase, so do the cognitive demands on decision-participants. The time required to
489 consider and evaluate choices increases, thus increasing costs to participate.

490 *IV.B.2. Structure of Financial Incentives/Subsidies*

491 Financial assistance or cost-share programs are a key policy mechanism to induce the
492 voluntary adoption of NPS management practices in the Chesapeake Bay region. Such
493 programs are the primary methods to incentivize landowners and decision makers in the
494 agricultural sector to change management practices and reduce NPS loads. Similar financial
495 assistance programs are used in urban stormwater programs to encourage households and
496 stormwater managers to implement stormwater controls (Ando and Netusil 2013; Gonzalez et
497 al. 2018). Such financial incentive programs can be structured in a myriad of ways (Engel 2016).
498 In general, all must answer a few basic questions: 1) what is paid for, 2) how is the level of
499 compensation determined, 3) how are people selected to receive the funds (or conversely, how
500 do program administrators ration limited program funds)?

501 *Pay-for-Practice Programs.* Traditional financial assistance programs generally answer these
502 questions in similar ways. First, these programs pay participants to adopt specific practices. In
503 other words, participants' financial payment is conditioned on the implementation of a particular
504 activity or practice, called "pay for practice". Second, the amount of compensation is typically

505 based on a percentage of the actual or estimated costs of installing//adopting the practice.
506 Finally, while financial assistance funds may be targeted to particular areas, the funds are
507 generally distributed based on a first come, first serve basis.

508 A variety of incentive designs can be employed to direct funds and focus pollution controls and
509 efforts in a pay for practice program. For example, pay-for-practice type program may be
510 modified to vary the amount of financial assistance based on the location or type of practice. For
511 example, the Honey Creek Project (Oklahoma) adjusted the relative financial assistance rates
512 for selected practices based on categorical assessments of the environmental benefit of the
513 project and the likelihood of adoption. Practices that were unlikely to be adopted without
514 financial assistance (high potential additionality) carried more financial assistance (Perez 2017).
515 Similarly, the Maryland Agricultural and Water Quality Cost Share (MACS) program offered
516 higher payment rates to farmers within certain targeted watersheds, including the Eastern Shore
517 of the Chesapeake Bay. (However, these differential payments were subsequently discontinued,
518 in part due to perceptions of fairness and equity.) In general, water quality managers adjust
519 cost-share rates based on spatial targeting of high loss fields using modelled outcomes (e.g.
520 SWAT, CBP water quality model). For programs such as the Honey Creek Project, the ability to
521 establish and maintain variable compensation rates was possible because program managers
522 were able to secure non-traditional funding sources that granted flexibility in how funds were
523 spent.

524 *Pay-for-Performance Programs.* A more direct targeting approach could pay recipients directly
525 for the level of pollutant removal services provided (e.g. paying directly for the outcome
526 desired), called pay-for-performance (Ribaudo et al. 1999; Ferraro and Simpson 2002; Shortle
527 et al 2012; Savage and Ribaudo 2016). Pay-for-performance programs could also be called pay
528 for services because payments are conditioned on the level of service provided (e.g. pollutant
529 reduction) rather than the installation of a practice that generates the service. Participants who
530 generate greater levels of the service receive more compensation. Conceptually, participants
531 have an incentive to undertake actions that generate the greatest reductions per dollar of
532 practice implementation cost. If performance metrics are appropriately scaled, then pay-for-
533 performance systems provide direct incentives to treat high loss areas.

534 To calculate removal services, program rules typically define a starting point (baseline or
535 reference point) from which to quantify the level of service provided. Total compensation paid
536 would not be based on costs incurred by the landowner, but on the quality of service provided
537 (e.g. the pounds of nutrients reduced) multiplied by the price or value of the service (e.g. \$/lb).

538 In such a system, the landowner must evaluate various options to reduce nutrient loads (BMPs
539 and NPS control options described above), the reduction achieved for each option, and what
540 must be given up (costs) to achieve them. In such a program, compensation received can
541 exceed observed financial costs of practice implementation, resulting in a potentially new profit-
542 making option for landowners. The policy does not presume knowledge of a participant's
543 opportunity costs. Rather, it relies on participants to determine whether the payment provides
544 sufficient compensation to provide the reductions or services requested.

545 A purported advantage of a pay for performance program for targeting is that it directly identifies
546 and pays for the desired water quality change. Conceptually, such an approach incentivizes
547 consideration of a wider array of pollutant control strategies and allows participants to select the
548 type and location of activities that generate the most reductions for the least cost. Choice
549 flexibility is essential since individual circumstances, costs, and physical conditions vary among
550 landowners (Fisher et al. 2016). Importantly, those who can provide the most abatement at the
551 lowest cost have the largest economic incentive to act. This means that landowners who may
552 not have traditionally participated in conservation programs might have a strong incentive to do
553 so. Such an approach is "self-targeting" in that those who can provide the most environmental
554 benefit at least cost stand to gain the greatest economic benefit. Another advantage of a pay for
555 performance program is that it will reveal information about the location and costs of available
556 abatement options. Yet, to be effective, the method of measuring or monitoring outcomes must
557 be refined enough to capture the heterogeneity described in the previous section, accurate
558 enough to be build trust among different stakeholders, and straight-forward enough to be
559 accessible and manageable for the program participants.

560 How is Compensation Determined? - Design Considerations of Pay-for-Performance Programs.

561 Obviously, the choice of the definition and measure of service change (performance measures)
562 is critical. Pay-for-performance targeting programs could quantify pollution removal services
563 based on predicted performance (pay-for-modeled performance) or observed (pay-for-
564 demonstrated performance) (Winsten et al 2011). If multiple outcomes/services are desired,
565 compensation could be based on an index of predicted environmental outcomes.

566 The most common approach is to base payments on modeled changes in nutrient loads (Fales
567 et al. 2016; Winsten and Hunter 2011; Fisher et al 2016). For instance, a pay for performance
568 program in Michigan afforded farmers a flat payment (\$225) for every ton of sediment reduced
569 based on a model that translated specific actions and BMPs into reductions of sediment load
570 (Fales et al. 2016; Wickerham 2019). Winrock International has piloted several programs in the

571 Midwest and Vermont that compensated landowners based on the pounds of P removed and
572 not on the number of BMPs installed (Fisher et al. 2016; Winrock 2010). Maryland's recently
573 revised nutrient trading program allows farmers and municipalities to receive payment for NPS
574 pollution reductions based on outcomes modeled in the Maryland Nutrient Trading/Tracking
575 Tool (MNTT) (Maryland Dept. of Environment 2017). Obviously, the NPS control options that
576 participants may select is limited to BMPs explicitly included in the model. Moreover, credible
577 field-scale models also have intensive data requirements (Muenich et al 2017), highlighting a
578 tradeoff between complexity/accessibility, accuracy/uncertainty, and cost.

579 Performance-based incentive programs, however, could condition payments based on actual
580 outcomes rather than predicted/modeled outcomes. Given the cost of direct monitoring and the
581 stochastic nature of nonpoint source loads, direct measurement of changes in pollutant
582 reduction poses a challenge, particularly for surface-flow and groundwater pathway pollutants.
583 However, the ability to measure/monitor stream bank erosion introduces new opportunities in
584 relation to pay for performance programs. Along with direct measurement, pay for performance
585 programs may base compensation on some other observable outcome that could be used as an
586 indicator of service provision. For instance, pilot programs have paid landowners based on soil
587 nutrient levels or nutrient levels in post-harvest plant tissue (Winrock 2010). Note that
588 compensation does not necessarily need to be based on a specific quantity of load reduction,
589 but on whether a particular target indicator is achieved. Program designers must be reasonably
590 confident that the performance metric provides a reliable indicator of the final outcome being
591 sought (pollutant reductions). Some pay for performance schemes pay a "performance bonus"
592 based on achievement of some benchmark indicator.

593 A pilot program in West Virginia developed a group payment scheme based on achievement of
594 ambient outcomes such as N concentration at a subwatershed level (Maille et al 2009). A group
595 of landowners in a small watershed (Culler's Run) received lump sum payments based on the
596 flow-weighted metric of N at the outlet of the watershed. The group then used these resources
597 to help install N reduction practices in the watershed.

598 Pay-for-performance programs must also consider the method for setting the price paid for the
599 service change (e.g. price per lb. of pollution reduction). Price per unit can be fixed or
600 negotiated (Engel 2016). Fixed price systems offer a single price for the service, though the
601 price may need to be adjusted based on how participants respond. For example, one pay for
602 performance program in Michigan's Saginaw Bay Watershed initially estimated the price per ton
603 of sediment reduced to be less than \$100/ton but had to increase the payment rate to \$225/ton

604 to induce higher levels of participation (Fales et al. 2016; Wickerham 2019). In contrast, if the
605 price is negotiated among participants, the landowner/farmer (service provider) must be willing
606 and able to develop an estimate of an acceptable price (Claassen et al 2008). Requiring the
607 participant to develop plans for both the pollution control strategies and bid price can complicate
608 the decision process and create significant disincentives to participate (Palm-Forster et al 2016).

609 The timing of financial incentive payments is another issue to address. In a traditional cost-
610 share program, participants typically receive financial assistance when the practice is installed.
611 Thus, financial assistance is provided before the service is actually delivered. However, in pay
612 for performance programs, the program sponsor/funder may wish to see some evidence that the
613 service is provided in order to make a payment. A pay for services program in the Northern
614 Everglades paid landowners annual payments only after the demonstration of service provision
615 (i.e. retaining water in designated wetland) (Lynch and Shabman 2011; Shabman et al. 2013).
616 To reduce uncertainty and risk from the landowner's perspective, the annual service payment
617 was coupled with a more conventional financial assistance program that reimbursed participants
618 for upfront installation costs.

619 Who Receives Funds? - Further Design Considerations. Targeting programs that rely on
620 financial incentives for landowners must also determine who receives funds. How are recipients
621 and projects selected? Moving beyond a first-come, first-serve model, some programs rely on a
622 ranking process to prioritize projects. The ranking system could be based on a number of
623 factors including estimated water quality impact or previous participation. Other programs may
624 use competitive processes to select projects and recipients of funding (Claassen et al., 2008).
625 Competitive bidding processes would require potential recipients to compete to deliver the NPS
626 pollution reduction service at the lowest possible cost, as in reverse auction designs. Such
627 processes have been used in Florida to reduce P (Shabman et al. 2013). Maryland has
628 implemented a bid process to solicit and identify cost effective restoration projects. Competitive
629 bidding processes, however, require additional costs and effort on the part of participants. In
630 some cases, the effort required to formulate bids may dramatically dampen participation (Palm-
631 Forster et al 2016).

632 *IV.B.3. Support, Outreach and Nudges for Decision-Making in Targeting Programs*

633 Like all voluntary nonpoint source control programs, targeting programs requires effective
634 technical support, communication, and persuasion to induce behavioral change. In targeting
635 programs, such support takes on critical importance because of the additional attention and

636 intellectual resources needed to identify critical source areas, evaluate nutrient reduction
637 options, or work with land managers with particularly high loss rates. Building and maintaining
638 trust between water quality managers and landowners, a commonly accepted condition for a
639 successful program, is universally cited as essential when developing new information and
640 incentives that might be required under a targeting program. The challenge is designing and
641 implementing programs that build that trust and social relationships.

642 Studies implementing targeting programs have noted some common themes for effective
643 engagement and trust building with land managers/program participants. For example, multiple
644 targeting efforts have noted the benefits of directly involving farmers and other land managers
645 directly into planning and implementation of conservation programs (Mailles et al 2009; Winrock
646 International 2010; Perez 2018). Pilot programs have experimented with involving landowners in
647 multiple ways, ranging from designing of ranking schemes to facilitate implementation. In a
648 West Virginia pilot, a group of farmers assumed leadership in identifying and prioritizing
649 implementation of BMPs in their subwatershed. Based on extensive in-stream monitoring, these
650 farmers identified N hot spots. In one case these landowners were able to convince a
651 neighboring landowner to allow the installation of a constructed wetland, which produced
652 ambient reductions in summer nitrate levels (Collins and Gilles 2014).

653 Nudges. There is increasing evidence of the effects of different behavioral nudges on landowner
654 participation in NPS programs and water quality management (Ferraro et al. 2017; Palm-Forster
655 et al. 2019). Some of the most promising behavioral interventions in this area include feedback
656 on outcomes, salience, and information provision coupled with peer comparisons. These
657 insights can be applied to improve the design and outreach efforts of targeting programs.

658 Feedback. A common theme in the conservation literature is the value of visible feedback of
659 outcomes for increasing program interest, commitment, and participation. In short, participation
660 and willingness to engage in targeting programs is improved if participants can see observable
661 and positive outcomes produced by their efforts (Wilson et al. 2014; Perez 2017) This may
662 occur from observing biological improvements in local streams (e.g. increased fish abundance)
663 or in-stream monitoring of ambient outcomes (Miao et al. 2016). On-field indicators could
664 include reduced sedimentation of ditches, decreasing levels of surplus nutrients in soil tests,
665 and decreased undermining of riparian areas due to stream bank erosion / retreat. Arguably,
666 targeting programs contain more design features that potentially offer such feedback to
667 landowners and program managers.

668 *Salience.* Increasing the salience of issues related to NPS runoff can be another important
669 method that may increase landowner participation in targeting programs, particularly given that
670 farmers' attention is divided among numerous competing priorities. For example, reminder
671 letters were found to significantly increase re-enrollment in the USDA's Conservation Reserve
672 Program (CRP), at a relatively modest cost to the program. Reminders coupled with public
673 disclosure of other landowners' interest in re-enrollment also led to higher re-enrollments in the
674 CRP, but no higher than the simple reminder itself (Wallander et al. 2017).

675 *Information Provision and Peer Comparisons.* Targeting programs can potentially induce
676 participation and behavior change through social referencing and peer comparison. For
677 example, farmers have long referenced their farming skills by comparing their crop yield with
678 neighbors. And in other environmental contexts--such as household energy and water use--
679 information provision and social comparisons have been shown to significantly increase
680 household willingness to engage in conservation behavior (Allcott 2011; Ferraro and Price
681 2013). The same appears to hold true in the context of NPS pollution. In an Iowa pay for
682 performance pilot, field level P and soil index results were posted on the local watershed
683 council's webpage. This public information (coded for confidentiality) created competitive
684 behavior from farmers to meet a benchmark level of performance (Winrock 2010; Perez 2018).
685 Information provision at the farm-level on stream bank erosion rates led to substantially larger
686 landowner investments in stream restoration when paired with peer comparisons (Goodkin et al.
687 2019). Farm- or parcel-level information provision and peer comparisons has historically been
688 difficult to provide for NPS pollution--given the challenges of identification and measurement
689 mentioned above (4.A). However, improved NPS monitoring tools, such as the aerial imagery
690 and mapping technology for stream bank erosion, provide an opportunity to implement such
691 parcel-level informational targeting in practice.

692 **V. Targeting Programs: Promise and Challenges**

693 **A. Putting the Pieces Together: Illustrations of Targeting Programs**

694 As described in Section IV, nonpoint source targeting programs can take on a variety of designs
695 or forms. A sample of the diversity of targeting program designs that have been implemented or
696 piloted is summarized in Table 2. These programs demonstrate diversity in the approaches
697 used to identify and target nonpoint source loads, as well as program designs used to induce
698 NPS reductions. Table 3 summarizes the targeting tools applied in several BMP targeting
699 projects and how the monitoring was used to link water quality outcomes to practice

700 implementation. These tables are intended to summarize in succinct form the numerous
 701 examples of targeting efforts to date that were described in Section IV.

702 **Table 2.** Nonpoint Source Targeting Programs

Program	Targeting Method /Tools	Level of Targeting	Incentive Payments	Payment Rate
Saginaw Bay Pay-for-Performance	GLWMS	Field and watershed level	Pay for performance (\$/ton of sediment)	Flat payment (\$225/ton)
Milwaukee River Pay-for-Performance		Field and watershed level		
Hewitt Creek, Iowa	P & soil condition indices, corn stalk NO ₃ test	Field and watershed level	Pay for performance + performance bonus payments for achieving benchmarks	
Cullers Run WVa	Ambient monitoring	Watershed	Group payment	Based on ambient outcomes (N) and allocated based on group decision-making
Honey Creek Oklahoma.	SWAT	Field and watershed level	Cost-share for practices	Differential cost share rates

703

704 **Table 3.** Measured/modeled outcomes of nonpoint source targeting programs.

Study	Targeting Approach	Monitoring/Attribution	Outcomes
Bishop et al. 2005 Delaware River Basin	Detailed farm survey , CSA identification	Paired watershed (Farm and forested watersheds), 2 yrs pre BMP, 5 yrs post BMP	- reduced dissolved P in stormflow by 43% (95% confidence interval is 36% to 49%) and particulate P in storm flow by 29% (15% to 41%)

Easton et al. 2008b, Delaware River Basin	Used soil topographic index in VSLF mode	-measured TP at watershed outlet (164 ha farm) -modeled paired watershed to isolate BMP impacts	- 36% reduction in dissolved P, 47% reduction in TP - Simulated and measured load reductions were equivalent
Rao et al. 2012, Delaware River Basin	Used results from Easton et al. 2008, above	-measured TP at watershed outlet (164 ha farm) -modeled paired watershed to isolate BMP impacts	-targeting buffers to the 50% of the land producing the most runoff resulted in a 73% cost reduction
Fleming et al. 2019, Mill Creek watershed, PA	Identified streambank erosion hotspots with DEM differencing using LiDAR data	-before/after restoration monitoring (15 yrs)	-restoration at 18 sites reduced sediment loads ~8,524 tn along with bound nutrients with very high cost-effectiveness, \$0.03, \$19, and \$14 per pound for sediment, P, and N, respectively
Perez 2017 Honey Creek, OK	Identified P hotspots with SWAT and verified with site inspections	-upstream/downstream paired watershed - 320 km ² project design	- 28% P reduction, 35% NO ₃ -N reduction - Participation of nearly half of priority farmers
Perez 2017 Hewitt Creek, IA	Collected field data for soil P index, soil conditioning index, and corn stalk nitrate test	- in-stream chemical monitoring, design insufficient to attribute reductions to BMPs -93 km ² watershed	- Downward trends in turbidity and TP attributable to BMPs because independent of rainfall - impact on suspend solids unclear -N loads not reduced
Perez 2017 Pleasant Valley, WI	-Previously identified as priority subwatershed - riparian site assessments - inventoried 90% of ag land to calculate soil P index and sediment loss (RUSLE2)	- before/after fisheries and quantitative habitat assessment - before/after instream P monitoring, paired watershed - 50 km ² watershed	- 24,750 ft stream restoration for \$10/ft - median storm load TP reduced by 55%

705

706

B. Remaining Challenges/Barriers

707 A review of targeting programs reveals a number of challenges confronting successful
708 implementation. This includes issues over distributional consequences of targeting, funding &
709 regulatory constraints, technical support and costs, and the ability to scale-up or replicate
710 findings from pilot programs.

711 Distributional Consequences. Voluntary targeting incentive programs are premised on the
712 notion that financial incentive payments go to areas that are able to achieve the greatest
713 reductions for the lowest cost. Consequently, financial payments will necessarily be distributed
714 unevenly across a watershed and decision participants. In some cases, land managers long
715 considered “good stewards” may realize few financial opportunities from a targeting program,
716 while others with high loss rates may be poised to receive a large share of funding.
717 Establishment of baselines can help address this issue, but these will reduce incentives for
718 some high impact/low cost landowners to participate (Ribaud et al 2014). Targeting pilot
719 programs frequently confront the tradeoffs between building participant support and distribution
720 of program benefits.

721 Funding Constraints. Federal and state financial assistance programs intended to incentivize
722 NPS reduction actions often have requirements and restrictions concerning the distribution of
723 funding within districts or regions, the total level of individual award levels, and how the funds
724 are spent. These restrictions can significantly limit the effectiveness of a targeting program by
725 limiting the choices and incentives of land managers. Political considerations and individual
726 award caps limit the amount of funds that may be devoted to addressing high loss regions or
727 projects. Finally, financial assistance may only cover certain types of practices or costs, limiting
728 or distorting choices of the most cost effective treatment options. Given the need for flexibility in
729 targeting financial assistance, it is unsurprising that targeting program administrators note the
730 critical importance of securing funding that is relatively unencumbered by formula or
731 administrative restrictions (Fales et al. 2016, Lynch and Shabman 2011; Perez 2017).

732 Administrative and Technical Challenges. Nonpoint source pollution is field and farm specific.
733 Pollutant loading and the effectiveness of control actions can vary tremendously between
734 watersheds and farms, and even within farms. Are technical tools and indicators available to
735 effectively capture these differences and convey them in a way that is accessible for landowner
736 participants and program managers? Furthermore, can the treatment of these high loss areas
737 be acknowledged and rewarded within established TMDL accounting frameworks? More work is
738 needed to better understand the administrative costs of targeting programs, particularly relative
739 to conventional programs.

740 Scaling-Up/Replication. There is little experience in scaling up incentive-based targeting
741 programs. Most success stories are focused on efforts at relatively small scales. Program
742 administrators often note that success depended on personal relationships that fostered the
743 trust and credibility necessary for successful implementation. How and whether these dynamics
744 can be replicated and sustained on larger scales is a largely unanswered question.

745 Most of the evidence on targeting program outcomes have been case-specific observations.
746 Very few formal evaluations of pilot programs have been conducted in a way that allows for
747 rigorous evaluation of program effects in comparison to what would have been achieved without
748 targeting. Similarly, the relatively limited number of pilot programs, and the variability of program
749 design, limits the ability to draw inferences on targeting program effects based on design
750 features. The heterogeneity across watersheds, large differences in program administrative
751 costs, and a lack of consistency regarding which expenditures are counted toward pollutant unit
752 reduction costs (i.e. practice maintenance costs, program monitoring costs, regulatory and
753 permitting costs) collectively limit the conclusions that can be drawn about the cost-
754 effectiveness of a targeting program by comparing unit removal costs under different program
755 structures.

756 **C. Targeting Outcomes - Opportunities and Promise**

757 Despite the real challenges that exist, the evidence synthesized above on technical tools for
758 targeting and program design features suggests there are also real opportunities for improving
759 the outcomes of conventional programs through targeting.

760 In several instances, targeting programs/efforts have been able to produce demonstrative
761 reductions in ambient (in stream) nutrient levels. For example, according to paired-watershed
762 comparisons, the Wisconsin Pleasant Valley and Oklahoma's Honey Creek targeting pilot
763 projects produced detectable reductions in ambient P loads (Perez 2017). Effective targeting of
764 attention and control efforts is a noted element in CEAP projects that produced observable
765 improvements in ambient pollution levels (Osmond et al 2012; Kurkalova 2015; NRCS 2016).
766 However, whether these reductions will be sufficient to overcome water quality impairments in
767 those watersheds is a question that merits further research.

768 Researchers consistently find large potential cost savings from NPS targeting. The potential
769 magnitude of cost savings appears to be significant, typically 30 to 50% based on modeling
770 studies (Carpentier et al 1998; Rabotyagov et al., 2014; Xu et al., 2019; Geng et al. 2019).
771 Savage and Ribaud (2016) estimated that pay for performance programs in the Chesapeake

772 Bay Watershed would achieve a water quality goal at a much lower cost than payments based
773 on practice costs, even with targeting. However, such projections of cost savings typically do not
774 attempt to account for constraints imposed by the regulatory environment and actual behavioral
775 response of participants (Wardropper et al. 2015).

776 Behavioral and cost evidence from pilot programs do suggest significant promise. For instance,
777 administrators of the Saginaw sediment pay for performance program estimate that paying
778 directly for sediment reductions using a model that estimates sediment losses at the subfield
779 level can purchase 4 times the amount sediment reductions than the conventional financial
780 incentive program operating in the same watershed (Winkerham and Fales 2019). Program
781 administrators attribute this increase in cost effectiveness primarily to the ability to devote funds
782 specifically toward areas experiencing high sediment losses. This is consistent with findings in
783 the Mill Creek watershed of Lancaster County, Pennsylvania, where newly available tools to
784 identify stream bank erosion hotspots have been piloted, and substantial reductions of sediment
785 and P can be achieved at a fraction of the land area, number of landowner contracts, and
786 overall cost required by other control practices (Fleming et al. 2019). The ability to devote not
787 only funds but also administrative outreach to a few high-loss areas presents a major
788 opportunity to improve the efficiency of existing NPS programs.

789 The extent to which targeting changes participation rates or reaches landowners who typically
790 do not participate in conservation programs is another area needing further study. However,
791 common themes emerge from reported behavior and participation rates in successful
792 applications of targeting programs. A shift in participant mindsets due to increased attention on
793 outcomes (lbs. reduced) and observable results heightened interest in conservation activities.
794 Pilot programs provide numerous examples of participants working collaboratively and
795 productively to identify and treat high loss areas. The flexibility to target funds to high needs
796 areas is consistently noted as essential to targeting program success. A pilot program in Ohio
797 (Alpine Cheese) documented how farmers who never participated in conservation assistance
798 programs were willing to address observable and highly farm specific nutrient loss areas
799 because funding and effort was explicitly directed to those specific problem areas, and the time
800 and administrative costs for the landowner were minimal.

801 **VI. Next Steps**

802 Targeting programs offer one avenue to secure additional nonpoint source reduction with
803 greater certainty in outcomes without necessarily relying on additional revenue streams. The
804 questions confronting water quality managers in the Chesapeake Bay are:

805 Is the potential for more effective nonpoint source targeting worth further time and effort to
806 pursue?

807 What efforts are needed to improve nonpoint source targeting in the Chesapeake Bay and what
808 form should improved targeting take?

809

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