6.0 Costs and Benefits of Storm Water BMPs

Storm water best management practices (BMPs) are the primary tool to improve the quality of urban streams and meet the requirements of NPDES permits. They include both the structural and non-structural options reviewed in Section 5.2 of this report. Some BMPs can represent a significant cost to communities, but these costs should be weighed against the various benefits they provide. This chapter will focus on reviewing available data on the costs and potential benefits of both structural and non-structural BMPs designed to improve the quality of urban and urbanizing streams, and the larger water bodies to which they drain.

As described in previous chapters, storm water runoff can contribute loadings of nutrients, metals, oil and grease, and litter that result in impairment of local water bodies. The extent to which these impairments are eliminated by BMPs will depend on a number of factors, including the number, intensity, and duration of wet weather events; BMP construction and maintenance activities; and the site-specific water quality and physical conditions. Because these factors will vary substantially from site to site, data and information are not available with which to develop dollar estimates of costs and benefits for individual types of BMPs. However, EPA's national estimates of costs and benefits associated with implementation of the NPDES Phase II rule are discussed in Section 6.4.

6.1 Structural BMP Costs

The term structural BMPs, often referred to as "Treatment BMPs," refers to physical structures designed to remove pollutants from storm water runoff, reduce downstream erosion, provide flood control and promote groundwater recharge. In contrast with non-structural BMPs, structural measures include some engineering design and construction.

Structural BMPs evaluated in this report include:

- Retention Basins
- Detention Basins
- Constructed Wetlands
- Infiltration Practices
- Filters
- Bioretention
- Biofilters (swales and filter strips).

The two infiltration systems focused on in this report are infiltration trenches and infiltration basins. Although bioretention can serve as a filtering system or infiltration practice, it is discussed separately because it has separate cost data and design criteria. In this report, wet swales are assumed to have the same cost as biofilters, because there are little cost data available on this practice. Additional information about these structural BMPs, including descriptions, applicability and performance data can be found in Chapter 5 of this report. Other BMPs include experimental and proprietary products, as well as some conventional structures such as water quality inlets. They are not included in this analysis because sufficient data are not available to support either the performance or the cost of these practices.

6.1.1 Base Capital Costs

The base capital costs refer primarily to the cost of constructing the BMP. This may include the cost of erosion and sediment control during construction. The costs of design, geotechnical testing, legal fees, land costs, and other unexpected or additional costs are not included in this estimate. The cost of constructing any BMP is variable and depends largely on site conditions and drainage area. For example, if a BMP is constructed in very rocky soils, the increased excavation costs may substantially increase the cost of construction. Also, land acquisition costs vary greatly from site to site.[4] In addition, designs vary slightly among BMP types. A wet pond may be designed with or without various levels of landscaping, for example. The data in Table 6-1 represent typical unit costs (dollars per cubic foot of treated water volume) from various studies, and should be considered planning level. In the case of retention and detention basins, ranges are used to reflect the economies of scale involved in designing these BMPs.

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[4] Land cost is the largest variable influencing overall BMP cost.

Table 6-1. Typical Base Capital Construction Costs for BMPs

BMP Type	Typical Cost* ($/cf)	Notes	Source
Retention and Detention Basins	0.50-1.00	Cost range reflects economies of scale in designing this BMP. The lowest unit cost represents approx. 150,000 cubic feet of storage, while the highest is approx. 15,000 cubic feet. Typically, dry detention basins are the least expensive design options among retention and detention practices.	Adapted from Brown and Schueler (1997b)
Constructed Wetland	0.60-1.25	Although little data are available to assess the cost of wetlands, it is assumed that they are approx. 25% more expensive (because of plant selection and sediment forebay requirements) than retention basins..	Adapted from Brown and Schueler (1997b)
Infiltration Trench	4.00	Represents typical costs for a 100-foot long trench.	Adapted from SWRPC (1991)
Infiltration Basin	1.30	Represents typical costs for a 0.25-acre infiltration basin.	Adapted from SWRPC (1991)
Sand Filter	3.00-6.00	The range in costs for sand filter construction is largely due to the different sand filter designs. Of the three most common options available, perimeter sand filters are moderate cost whereas surface sand filters and underground sand filters are the most expensive.	Adapted from Brown and Schueler (1997b)
Bioretention	5.30	Bioretention is relatively constant in cost, because it is usually designed as a constant fraction of the total drainage area.	Adapted from Brown and Schueler (1997b)
Grass Swale	0.50	Based on cost per square foot, and assuming 6 inches of storage in the filter.	Adapted from SWRPC (1991)
Filter Strip	0.00-1.30	Based on cost per square foot, and assuming 6 inches of storage in the filter strip. The lowest cost assumes that the buffer uses existing vegetation, and the highest cost assumes that sod was used to establish the filter strip.	Adapted from SWRPC (1991)

* Base year for all cost data: 1997

In some ways there is no such value as the "average" construction cost for some BMPs, because many BMPs can be designed for widely varying drainage areas. However, there is some value in assessing the cost of a typical application of each BMP. The data in Table 6-2 reflect base capital costs for typical applications of each category of BMP. It is important to note that, since many BMPs have economies of scale, it is not practical to extrapolate these values to larger or smaller drainage areas in many cases.

Table 6-2. Base Costs of Typical Applications of Storm Water BMPs[1]

BMP Type	Typical Cost ($/BMP)	Application	Data Source
Retention Basin	$100,000	50-Acre Residential Site (Impervious Cover = 35%)	Adapted from Brown and Schueler (1997b)
Wetland	$125,000	50-Acre Residential Site (Impervious Cover = 35%)	Adapted from Brown and Schueler (1997b)
Infiltration Trench	$45,000	5-Acre Commercial Site (Impervious Cover = 65%)	Adapted from SWRPC (1991)
Infiltration Basin	$15,000	5-Acre Commercial Site (Impervious Cover = 65%)	Adapted from SWRPC (1991)
Sand Filter	$35,000-$70,000[2,3]	5-Acre Commercial Site (Impervious Cover = 65%)	Adapted from Brown and Schueler (1997b)
Bioretention	$60,000	5-Acre Commercial Site (Impervious Cover = 65%)	Adapted from Brown and Schueler (1997b)
Grass Swale	$3,500	5-Acre Residential Site (Impervious Cover = 35%)	Adapted from SWRPC (1991)
Filter Strip	$0-$9,000[3]	5-Acre Residential Site (Impervious Cover = 35%)	Adapted from SWRPC (1991)

1. Base costs do not include land costs.
2. Total capital costs can typically be determined by increasing these costs by approximately 30%.
3. A range is given to account for design variations.

Although various manuals report construction cost estimates for storm water ponds, EPA has identified only three studies that have systematically evaluated the construction costs associated with structural BMPs since 1985. The three studies used slightly different estimation procedures. Two of these studies were conducted in the Washington, DC region and used a similar methodology (Wiegand et al, 1986; Brown and Schueler, 1997b). In both studies, the costs were determined based on engineering estimates of construction costs from actual BMPs throughout the region. In the third study, conducted in Southeastern Wisconsin, costs were determined using standardized cost data for different elements of the BMP, and assumptions of BMP design (SWRPC, 1991).

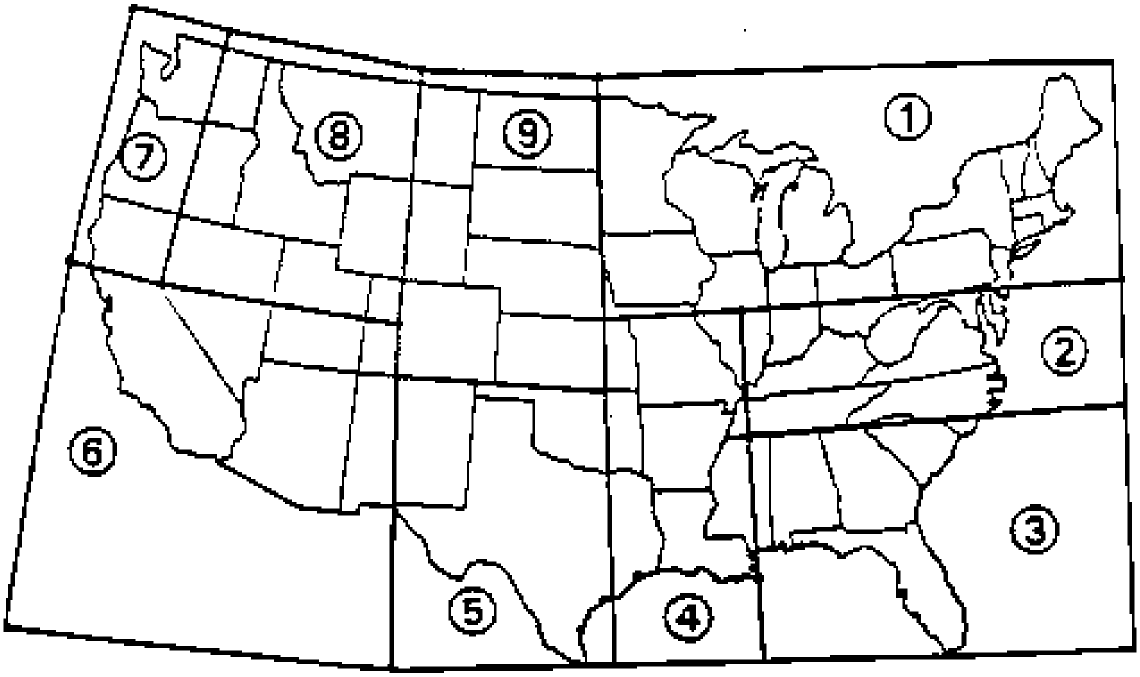
Any costs reported in the literature need to be adjusted for inflation and regional differences. All costs reported in this report assume a 3 percent annual inflation rate. In addition, studies are adjusted to the "twenty cities average" construction cost index, to adjust for regional biases, based on a methodology followed by the American Public Works Association (APWA, 1992). Using EPA's rainfall zones (see Figure 6-1), a cost adjustment factor is assigned to each zone (Table 6-3). For example, rainfall region 1 has a factor of 1.12. Thus, all studies in the Northeastern United States are divided by 1.12 in order to adjust for this bias.

Table 6-3. Regional Cost Adjustment Factors

Rainfall Zone	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**
Adjustment Factor	1.12	0.90	0.67	0.92	0.67	1.24	1.04	1.04	0.76

Source: Modified from APWA, 1992

Figure 6-1. Rainfall Zones of the United States



Not shown: Alaska (Zone 7); Hawaii (Zone 7); Northern Mariana Islands (Zone 7); Guam (Zone 7); American Samoa (Zone 7); Trust Territory of the Pacific Islands (Zone 7); Puerto Rico (Zone 3) Virgin Islands (Zone 3).
Source: NPDES Phase I regulations, 40 CFR Part 122, Appendix E (US EPA, 1990)

6.1.1.1 Retention/Detention Basins and Constructed Wetlands

The total volume of the basin is generally a strong predictor of cost (Table 6-4). There are some economies of scale associated with constructing these systems, as evidenced by the slope of the volume equations derived. This is largely because of the costs of inlet and outlet design, and mobilization of heavy equipment that are relatively similar regardless of basin size.

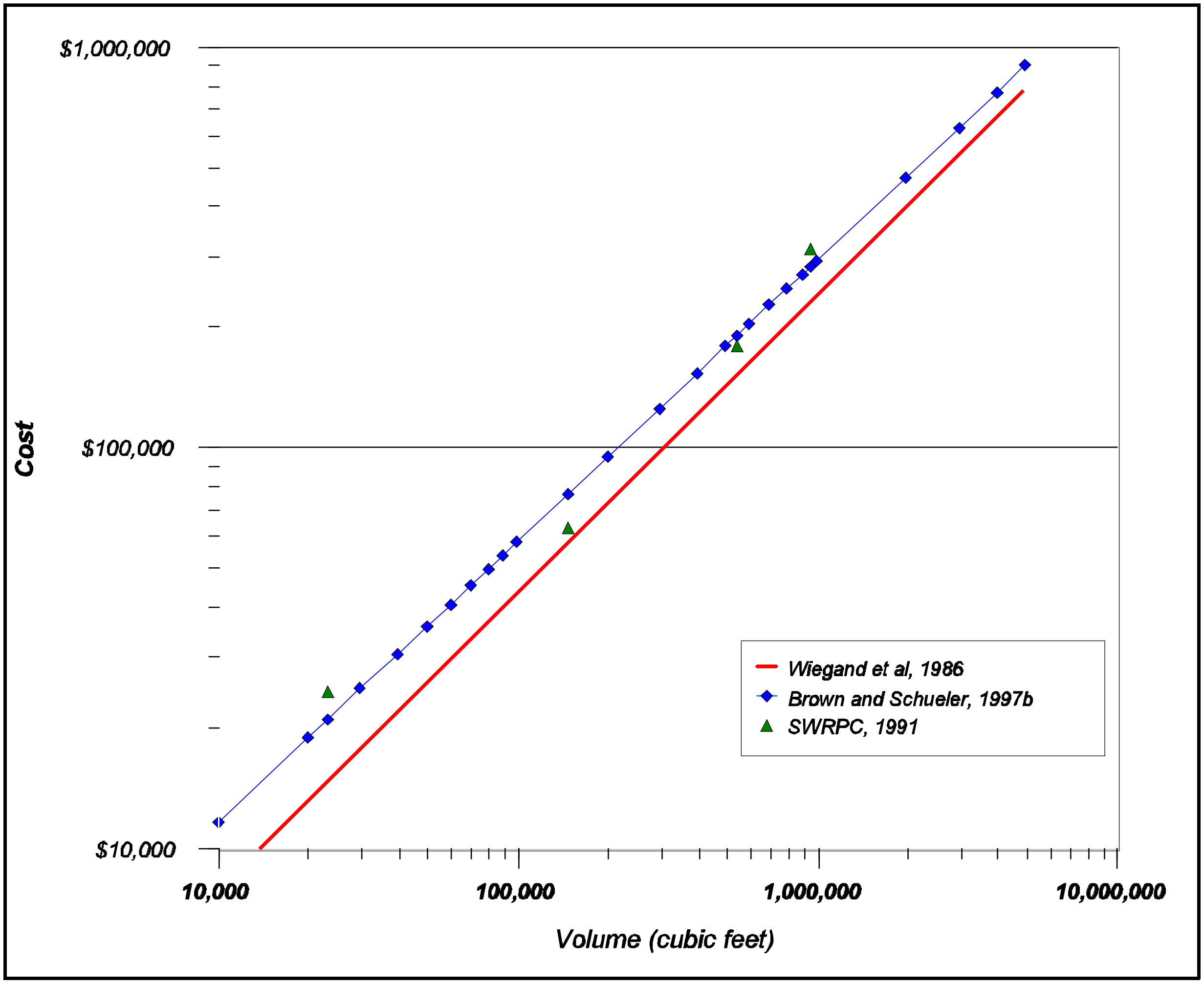
Erosion and sediment control represents only about 5 percent of the construction cost of basins and wetlands (Brown and Schueler, 1997b). Thus, the construction cost estimates presented in Table 6-2 are comparable. The cost of building storm water retention and detention systems has increased since 1986 (Figure 6-2), even after adjusting for inflation. Part of the reason for this increase is thought to be attributable to the improved design of these systems to enhance water quality driven by a more complex regulatory and review environment (Brown and Schueler, 1997b). The cost estimations made by SWRPC (1991) were generally a mid-range between the earlier and more recent studies.

Table 6-4. Base Capital Costs for Storm Water Ponds and Wetlands

BMP Type	Cost Equation or Estimate	Costs Included		Source
		Construction	E&S Control	
Retention Basins and Wetlands	$7.75V^{0.75}$	✔	✔	Wiegand et al, 1986
	$18.5V^{0.70}$	✔		Brown and Schueler, 1997b
Detention Basins	$7.47V^{0.78}$	✔	✔	Brown and Schueler, 1997b
Retention Basins	1.06V: 0.25 acre retention basin (23,300 cubic feet)	✔		SWRPC, 1991
	0.43V: 1.0 acre retention basin (148,000 cubic feet)			
	0.33V: 3.0 acre retention basin (547,000 cubic feet)			
	0.31V: 5.0 acre retention basin (952,000 cubic feet)			

Notes
V refers to the total basin volume in cubic feet
Costs presented from SWRPC (1991) are "moderate" costs reported in that study.

Figure 6-2. Retention Basin Construction Cost



6.1.1.2 Infiltration Practices

Costs for infiltration BMPs are highly variable from site to site, depending on soils and other geotechnical information. Perhaps because of this variability, cost estimates for infiltration trenches have been widely different (Table 6-5; Figure 6-3). Brown and Schueler (1997b) concluded that the Wiegand (1986) equation underestimated cost, partially because of the lack of pretreatment in earlier designs, although they were unable to develop a consistent equation due to a small sample size.

It is difficult to estimate the cost of infiltration basins, mainly due to a lack of recent cost data. The costs estimates for SWRPC are dramatically higher than those estimated by Schueler, 1987 (Figure 6-4). This is largely because the SWRPC document assumes that 50 percent additional volume is excavated for the spillway, while Schueler uses a retention basin cost equation.

Table 6-5. Base Capital Costs for Infiltration Practices

BMP Type	Cost Equation or Estimate[4]	Costs Included		Source
		Construction	E&S Control	
Infiltration Trenches[1]	$33.7V^{0.63}$	✔		Wiegand et al, 1986
	2V to 4V; average of 2.5V	✔		Brown and Schueler, 1997b
	$4,400: 3-foot deep, 4-foot wide, 100-foot long trench	✔		SWRPC, 1991
	$10,400: 6-foot deep, 10-foot wide, 100-foot long trench			
	3.9V+2,900: 3-foot deep, 100-foot long trench	✔		Modified from SWRPC, 1991
Infiltration Basins[2]	$13.2V^{0.69}$	✔	✔	Schueler, 1987; Modified from Wiegand et al, 1986
	1.3V: 0.25-acre infiltration basin (15,000 cubic feet)	✔		SWRPC, 1991
	0.8V: 1.0-acre infiltration basin (76,300 cubic feet)			
Porous Pavement[3]	50,000A	✔		SWRPC, 1991
	80,000A	✔		Schueler, 1987

1. V for infiltration trenches refers to the treatment volume (cubic feet) within the trench, assuming a porosity of 32%.
2. V for infiltration basins refers to the total basin volume (cubic feet).
3. A is the surface area in acres of porous pavement.
4. Costs presented from SWRPC (1991) are “moderate” costs reported in that study.

Figure 6-3. Infiltration Trench Cost

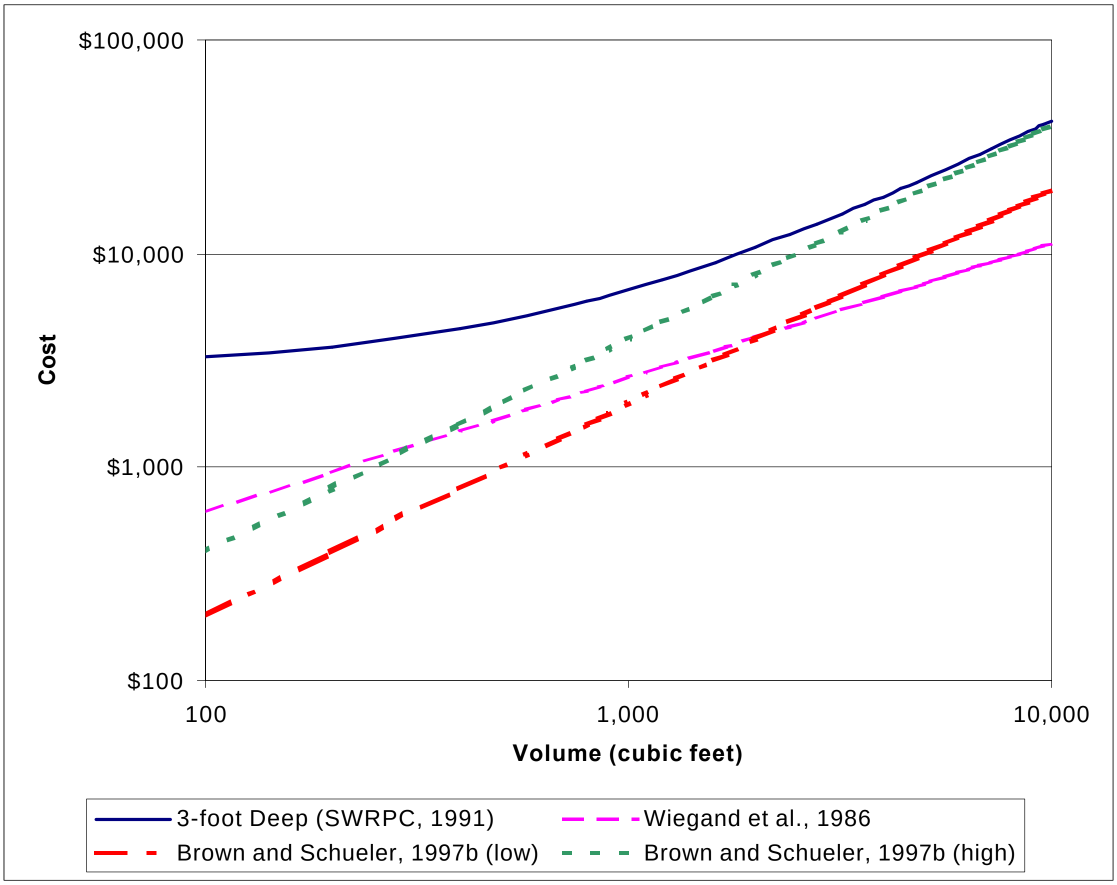
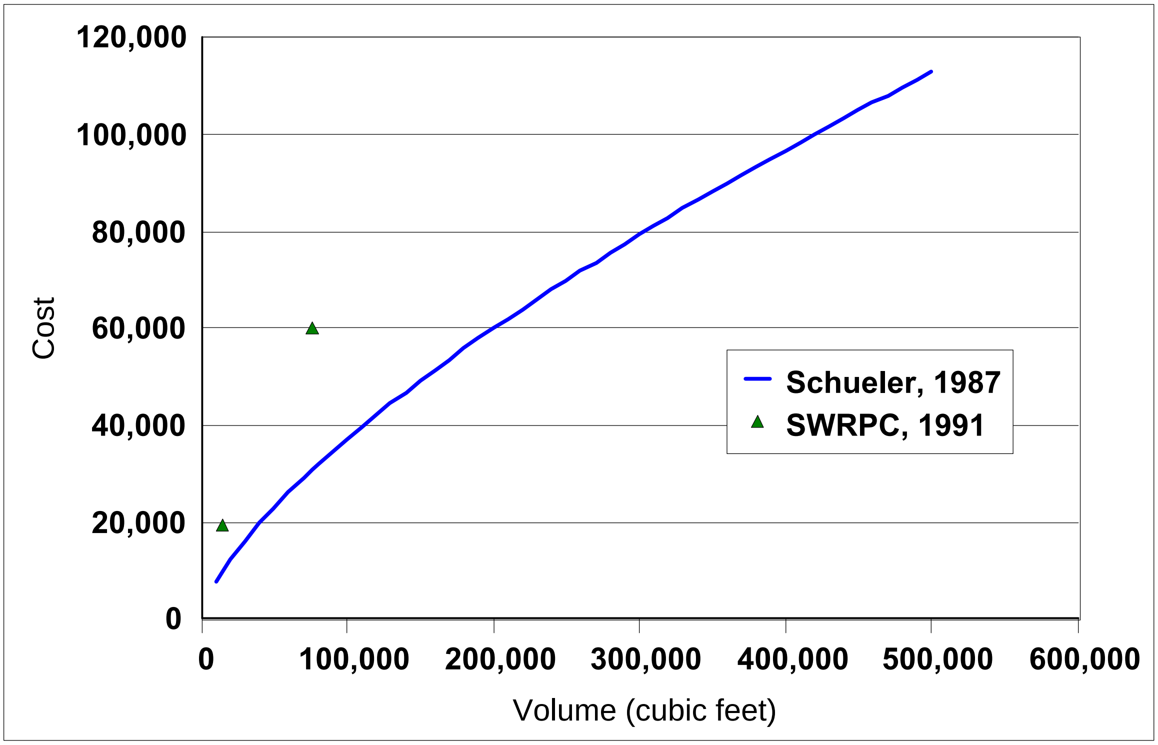


Figure 6-4. Infiltration Basin Construction Cost



6.1.1.3 Sand Filters

Since sand filters have not been used as long as other BMPs, less information is available on their cost than on most BMPs. In addition, the costs of sand filters vary significantly due to the wide range of design criteria for sand filters (Table 6-6). Brown and Schueler (1997b) were unable to derive a valid relationship between sand filter cost and water quality volume, with costs ranging between $2 and $6 per cubic foot of water quality volume, with a mean cost of $2.50 per cubic foot. The water quality volume includes the pore space in the sand filter, plus additional storage in the pretreatment basin.

Because of the lack of cost data, no equation referencing the economies of scale has been developed. However, it appears that economies of scale do exist. For example, data from Austin indicates that the cost per acre decreased by over 80 percent for a design of a 20-acre drainage area, when compared with a 1-acre drainage area. (Schueler, 1994a).

Table 6-6. Construction Costs for Various Sand Filters

Region (Design)	**Cost/Impervious Acre**
Delaware	$10,000
Alexandria, VA (Delaware)	$23,500
Austin, TX (< 2 acres)	$16,000
Austin, TX (> 5 acres)	$3,400
Washington, DC (underground)	$14,000
Denver, CO	$30,000-$50,000

Source: Schueler, 1994a

6.1.1.4 Bioretention

Little information is available on the costs of bioretention because it is a relatively new practice. Brown and Schueler (1997b) found consistent construction costs of approximately $5.30 per cubic foot of water quality volume for the construction cost. The water quality volume includes 9 inches above the surface area of the bioretention structure.

6.1.1.5 Vegetative BMPs

The two major types of vegetative BMPs include filter strips and grassed swales (also called “biofilters”). The costs for these BMPs vary, and largely depend on the method used to establish vegetation (Table 6-7).

Table 6-7. Base Capital Costs of Vegetative BMPs

BMP Type	Cost Equation or Estimate[1]	Costs Included		Source
		Construction	E&S Control	
Filter Strips	Existing Vegetation: 0	✔		SWRPC, 1991
	Seed: $13,800/acre			
	Sod: $29,000/acre			
Grassed Channels	25¢ per square foot	✔		SWRPC, 1991

1. Costs presented from SWRPC (1991) are "moderate" costs reported in that study.

6.1.2 Design, Contingency and Permitting Costs

Most BMP cost studies assess only part of the cost of constructing a BMP, usually excluding permitting fees, engineering design and contingency or unexpected costs. In general, these costs are expressed as a fraction of the construction cost (Table 6-8). These costs are generally only estimates, based on the experience of designers.

Table 6-8. Design, Contingency and Permitting Costs

Additional Costs Estimate (Fraction of base construction costs)	Source	Comments
25%	Wiegand et al, 1986	Includes design, contingencies and permitting fees
32%	Brown and Schueler, 1997b	Includes design, contingencies, permitting process and erosion and sediment control

6.1.3 Land Costs

The cost of land is extremely variable both regionally and by surrounding land use. For example, many suburban jurisdictions require open space allocations within the developed site, reducing the effective cost of land for BMPs to zero (Schueler, 1987). On the other hand, the cost of land may far outweigh construction and design costs in ultra-urban settings. For this reason, some underground BMPs that are relatively expensive to construct may be attractive in this "ultra-urban" setting if sub-surface conditions are suitable (Lundgren, 1996). The land consumed per treatment volume depends largely on how much of the BMP's treatment is underground, and varies considerably (Table 6-9).

Table 6-9. Relative Land Consumption of Storm Water BMPs

BMP Type	**Land consumption (% of Impervious Area)**
Retention Basin	2-3%
Constructed Wetland	3-5%
Infiltration Trench	2-3%
Infiltration Basin	2-3%
Porous Pavement	0%
Sand Filters	0%-3%
Bioretention	5%
Swales	10%-20%
Filter Strips	100%

Note: Represents the amount of land needed as a percent of the impervious area that drains to the practice to achieve effective treatment.
Source: Claytor and Schueler, 1996

6.1.4 Operation and Maintenance Costs

Maintenance can be broken down into two primary categories: aesthetic/nuisance maintenance and functional maintenance. Functional maintenance is important for performance and safety reasons, while aesthetic maintenance is important primarily for public acceptance of BMPs, and because it may also reduce needed functional maintenance. Aesthetic maintenance is obviously more important for BMPs that are very visible, such as ponds and biofiltration facilities.

In most studies, operation and maintenance (O&M) costs have been estimated as a percentage of base construction costs (Table 6-10). While some BMPs require infrequent, costly maintenance, others need more frequent but less costly maintenance.[5] Accordingly, selection of appropriate structural BMPs must factor in maintenance cost (and a responsible party to carry out maintenance) to ensure the necessary long-term performance. Typical maintenance activities are included in Table 5-3.

Table 6-10. Annual Maintenance Costs

BMP	Annual Maintenance Cost (% of Construction Cost)	Source(s)
Retention Basins and Constructed Wetlands	3%-6%	Wiegand et al, 1986 Schueler, 1987 SWRPC, 1991
Detention Basins[1]	<1%	Livingston et al, 1997; Brown and Schueler, 1997b
Constructed Wetlands[1]	2%	Livingston et al, 1997; Brown and Schueler, 1997b
Infiltration Trench	5%-20%	Schueler, 1987 SWRPC, 1991
Infiltration Basin[1]	1%-3%	Livingston et al, 1997; SWRPC, 1991
	5%-10%	Wiegand et al, 1986; Schueler, 1987; SWRPC, 1991
Sand Filters[1]	11%-13%	Livingston et al, 1997; Brown and Schueler, 1997b
Swales	5%-7%	SWRPC, 1991
Bioretention	5%-7%	(Assumes the same as swales)
Filter strips	$320/acre (maintained)	SWRPC, 1991

1. Livingston et al (1997) reported maintenance costs from the maintenance budgets of several cities, and percentages were derived from costs in other studies

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[5] Maintenance costs can also vary significantly based on a variety of site- and region-specific parameters, therefore the maintenance costs presented in Table 6-10 should be considered only as general guidelines.

6.1.5 Long-Term BMP Costs: Two Scenarios

In order to compare various BMP options, costs were calculated for a 5-acre commercial site and a 38-acre residential site.[6] Construction costs were evaluated using the following steps:

1. *Calculate the water quality volume* (WQ_v).[7]
Using a water quality volume based on a 1-inch storm, the volume is equal to:

$$WQ_v = (.05 + .9I)\, A/12$$

where: WQ_v = Water Quality Volume (Acre-Feet)
I = Impervious Fraction in the Watershed
A = Watershed Area (Acres)

2. *Calculate the detention storage volume.*
Total detention storage was determined using standard peak flow methods (USDA/NRCS, 1986). Detention storage was calculated for a 5-inch storm.

3. *Calculate total volume.*
Many BMPs do not require any detention storage, but for BMPs that do provide flood storage, the total volume is the sum of the water quality and detention volumes calculated in steps 1 and 2.

4. *Determine the construction cost.*
The construction cost for each BMP is determined based on equations described in Section 6.1.1.

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[6] Although these evaluations are useful for comparing potential costs of various structural BMPs, they should not be applied for use in all areas of the country. In addition, the BMPs, selected in these examples and the sizing criteria that the costs were based on should not be considered as recommendations for actual BMP selection and design. They are presented solely for illustrative purposes.

[7] "Water quality volume" refers to the volume of water that the BMP is designed to treat. For example, a BMP may be designed to capture the first inch of runoff from the drainage area. Any volume of rainfall over the first inch would bypass the BMP. Therefore water quality volume for this BMP would be one watershed inch.

6.1.5.1 5-Acre Commercial Development

The following data were used as the basis for the 5-acre commercial development.

Table 6-11. Data for the Commercial Site Scenario

Area (A)	5 acres
Impervious Cover (I)	65%
Water Quality Volume P · Rv · A/12 P = 1" of rainfall Rv = 0.5 + 0.9 (I) A = Drainage Area	0.26 ac-ft
Total Detention Storage (using TR-55 model)	0.74 ac-ft
Total Storage	1.00 ac-ft

These data were then used to compare various BMP options (Table 6-12). Grassed swales and filter strips were not included in this analysis because, although they do improve water quality, they are typically used only in combination with other BMPs in a new development area. Again, it is important to note that the cost of land is not included in this calculation. Although retention basins are the least expensive option on an annual basis, the cost of land may drive designs to less space-consumptive BMPs, such as sand filters or bioretention systems.

Table 6-12. BMP Costs for a Five Acre Commercial Development

BMP Type	Construction Cost Equation	Construction Cost	Typical Design, Contingency & Other Capital Costs (30% of Construction Costs)	Annual Maintenance Costs (% of Construction, $)	Notes	Sources
Retention Basin	$18.5V_t^{0.70}$	$32,700	$9,810	5%; $1,640	Much of the cost associated with this BMP is the extra storage to provide flood control and channel protection. Ponds are very reliable.	a, b, c, d, e
Infiltration Trench	$3.9WQ_v$ +2,900	$47,100	$14,100	12%; $5,650	Although infiltration trenches are designed to last a long time, they need to be inspected and rebuilt if they become clogged.	c, d, e
Infiltration Basin	$1.3WQ_v$	$14,700	$4,410	8%; $1,180	Infiltration basins require careful siting and design to perform effectively..	b, c, d, e
Sand Filter	$4WQ_v$	$45,200	$13,600	12%; $5,420	Sand filters require frequent maintenance in order to function long-term.	a, e, f
Bioretention	$5.30WQ_v$	$60,000	$18,000	6%; $3,600	Bioretention is a relatively new BMP. Little is known about its long-term performance.	a, d

1. WQv = Water Quality Volume, cu. ft. 2. V_t = Total Volume, cu. ft.
3. Sand filter volume was estimated at 4WQv, which is slightly high, to account for the relatively small drainage area.

a. Brown and Schueler, 1997b b. Wiegand et al, 1986 c. Schueler, 1987 d. SWRPC, 1991 e. US EPA, 1993a f. Livingston et al, 1997

6.1.5.2 38-Acre Residential Development

The following data were used as the basis for the 38-acre residential development.

Table 6-13. Data for the Residential Site Scenario

Area (A)	38 acres
Impervious Cover (I)	36%
Water Quality Volume	1.1 ac-ft
Total Detention Storage (using TR-55 model)	2.8 ac-ft
Total Storage	3.9 ac-ft

The same analysis conducted for the commercial site was repeated for the larger site (Table 6-14). Bioretention and infiltration systems were not included in this analysis, because these BMPs are best applied on smaller sites. The costs of swales and filter strips were also not included, although they could be effectively used in combination with retention systems to provide pretreatment.

6.1.6 Adjusting Costs Regionally

The cost data in these examples can be adjusted to specific zones of the country using the regional cost adjustment factors in Table 6-3. For example, if costs for Rainfall Zone 1 were needed, the data in Tables 6-12 or 6-14 would be multiplied by 1.12.

In addition, design variations in different regions of the country may cause prices to be changed. For example, wetland and wet ponds may be restricted in arid regions of the country. Furthermore, while retention basins are used in semi-arid regions, they usually incorporate design variations to improve their performance (Saunders and Gilroy, 1997). In cold regions, BMPs may need to be adapted to account for snowmelt treatment, deep freezes and road salt application (Oberts, 1994; Caraco and Claytor, 1997), which will cause additional changes in BMP costs.

Table 6-14. BMP Costs for a Thirty-Eight Acre Residential Development

BMP Type	Construction Cost Equation	Construction Cost	Design, Contingency and other Capital Costs (30% of Construction)	Annual Maintenance Costs (% of Construction; $)	Notes	Sources
Retention Basin	$18.5V_t^{0.70}$	$84,800	$25,400	5%; $4,240	Pond systems are relatively easy to apply to large sites.	a, b, c, d, e
Sand Filter	$2WQ_v$	$95,800	$28,700	12%; $11,500	Although the sand filter is used in this example, some evidence suggests that sand filters may be subject to clogging if used on a site that drains a relatively pervious drainage area such as this one.	a, e, f
1. WQv = Water Quality Volume, cu. ft. 2. Vt = Total Volume, cu. ft. 3. Sand filter volume was estimated at 2V, which is slightly low, to account for the relatively large drainage area						
a. Brown and Schueler, 1997b b. Wiegand et al, 1986 c. Schueler, 1987 d. SWRPC, 1991 e. US EPA, 1993a f. Livingston et al, 1997						

6.2 Non-Structural BMP Costs

Non-structural BMPs are management measures that prevent degradation of water resources by preventing pollution at the source, rather than treating polluted runoff. Non-structural practices include a variety of site-specific and regional practices, including: street sweeping, illicit connection identification and elimination, public education and outreach, land use modifications to minimize the amount of impervious surface area, waste collection and proper materials storage. While non-structural practices play an invaluable role in protecting surface waters, their costs are generally not as easily quantified as for structural BMPs. This is primarily because there are no “design standards” for these practices. For example, the cost of a public education program may vary due to staff size. However, it is possible to identify costs associated with specific components of these programs based on past experience.

6.2.1 Street Sweeping

The costs of street sweeping include the capital costs of purchasing the equipment, plus the maintenance and operational costs to operate the sweepers, as well as costs of disposing the materials that are removed. Both equipment and operating costs vary depending on the type of sweeper selected. There are several different options for sweepers, but the two basic choices are mechanical sweepers versus vacuum-assisted sweepers. Mechanical sweepers use brushes to remove particles from streets. Vacuum-assisted dry sweepers, on the other hand, use a specialized brush and vacuum system in order to remove finer particles. While the equipment costs of mechanical sweepers are significantly higher, the total operation and maintenance costs of vacuum sweepers can be lower (Table 6-15).

Table 6-15. Street Sweeper Cost Data

Sweeper Type	Life (Years)	Purchase Price ($)	Operation and Maintenance Costs ($/curb mile)	Sources
Mechanical	5	75,000	30	Finley, 1996; SWRPC, 1991
Vacuum-assisted	8	150,000	15	Satterfield, 1996; SWRPC, 1991

Using these data, the cost of operating street sweepers per curb mile were developed, assuming various sweeping frequencies (Table 6-16). The following assumptions were made to conduct this analysis:

- One sweeper serves 8,160 curb miles during a year (SWRPC, 1991).

- The annual interest rate is 8 percent.

Table 6-16. Annualized Sweeper Costs ($/curb mile/year)

Sweeper Type	Sweeping Frequency					
	Weekly	Bi-weekly	Monthly	Four times per year	Twice per year	Annual
Mechanical	1,680	840	388	129	65	32
Vacuum-Assisted	946	473	218	73	36	18

Modified from Finley, 1996; SWRPC, 1991; and Satterfield, 1996

6.2.2 Illicit Connection Identification and Elimination

One source of pollutants is direct connections or infiltration to the storm drain system of wastewaters other than storm water, such as industrial wastes. These pollutants are then discharged through the storm drain system directly to streams without receiving treatment. These illicit connections can be identified using visual inspection during dry weather or through the use of smoke or dye tests. Using visual inspection techniques, illicit connections can be identified for between $1,250 and $1,750 per square mile (Center for Watershed Protection, 1996).

6.2.3 Public Education and Outreach

Public education programs encompass many other more specific programs, such as fertilizer and pesticide management, public involvement in stream restoration and monitoring projects, storm drain stenciling, and overall awareness of aquatic resources. All public education programs seek to reduce pollutant loads by changing people’s behavior. They also make the public aware of and gain support for programs in place to protect water resources. Most municipalities have at least some educational component as a part of their program. A recent survey found that 30 of the 32 municipal storm water programs surveyed (94 percent) incorporate an education element and 11 programs (34 percent) mandated this element in law or regulation (Livingston et al, 1997).

The City of Seattle, with a population of approximately 535,000, has a relatively aggressive education program, including classroom and field involvement programs. The 1997 budget for some aspects of the program is included in Table 6-17. Although this does not necessarily reflect typical effort or expenditures, it does provide information on some educational expenditures. These data represent only a portion of the entire annual budget.

Table 6-17. Public Education Costs in Seattle, Washington

Item	Description	1997 Budget
Supplies for Volunteers	Covers supplies for the Stewardship Through Environmental Partnership Program	$17,500
Communications	Communications strategy highlighting a newly formed program within the city	$18,000
Environmental Education	Transportation costs from schools to field visits (105 schools with four trips each)	$46,500
Education Services / Field Trips	Fees for student visits to various sites	$55,000
Teacher Training	Covers the cost of training classroom teachers for the environmental education program	$3,400
Equipment	Equipment for classroom education, including displays, handouts, etc.	$38,800
Water Interpretive Specialist: Staff	Staff to provide public information at two creeks	$79,300
Water Interpretive Specialist: Equipment	Materials and equipment to support interpretive specialist program	$12,100
Youth Conservation Corps	Supports clean-up activities in creeks	$210,900

Source: Washington DOE, 1997

Some unit costs for educational program components (based on two different programs) are included in Table 6-18.

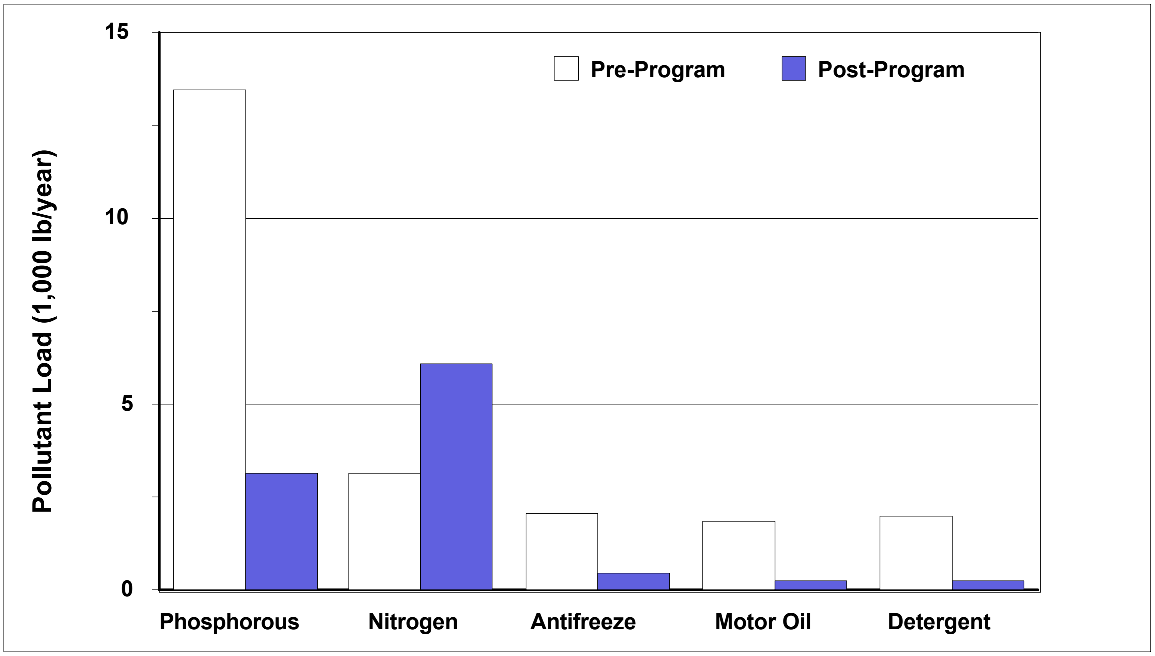
Table 6-18. Unit Program Costs for Public Education Programs

Item	Cost	Source
Public Attitude Survey	$1,250-$1,750 per 1,000 households	Center for Watershed Protection, 1996
Flyers	10-25¢/ flyer	Ferguson et al, 1997
Soil Test Kit*	$10	Ferguson et al, 1997
Paint	25-30¢/SD Stencil	Ferguson et al, 1997
Safety Vests for Volunteers	$2	Ferguson et al, 1997

* Includes cost of testing, but not sampling.

Although public education has the intended benefit of raising public awareness, and therefore creating support of environmental programs, it is difficult to quantify actual pollutant reductions associated with education efforts. Public attitudes can be used as a gauge of how these programs perform, however. In Prince George's County, Maryland a public survey was used in combination with modeling to estimate pollutant load reductions associated with public education (Smith et al, 1994; Claytor, 1996; Figure 6-5). An initial study was conducted to estimate pollution from field application of fertilizers, and use of detergents, oil and antifreeze. Pollutant reductions were then completed assuming that 70 percent of the population complied with recommendations of the public education program. A follow-up survey was used to assess the effectiveness of the program. Although insufficient data were available to support a second model run, a follow-up survey indicated that educational programs influenced many citizen behaviors, such as recycling. They were unsuccessful, however, at changing the rate at which citizens apply lawn fertilizers.

Figure 6-5. Changes in Pollutant Load Associated with a Public Education Program Based on a Public Survey



Source: Claytor, 1996

6.2.4 Land Use Modifications

One of the most effective tools to reduce the impacts of urbanization on water resources is to modify the way growth and development occurs across the landscape. At the jurisdictional or regional level, growth can be managed to minimize the outward extension of development. Jurisdictions can direct growth away from environmentally sensitive areas using such techniques as open space preservation, re-zoning or the transfer of development rights. At the site level, the nature of development can be modified to reduce the impacts of impervious cover at individual development projects through techniques such as reduced street widths, clustered housing, smaller parking lots, and incorporation of vegetative BMPs into site design. While there are legal fees associated with changing both local and regional zoning codes, data suggest that concentrating development and minimizing impervious cover at the site level can actually reduce construction costs to both developers and local governments.

By concentrating development near urban areas, the capital costs of development can be lowered substantially due to existing infrastructure and other public services. With conventional development patterns, the cost of servicing residential developments exceeds the tax revenues from these developments by approximately 15 percent (Pelley, 1997). By encouraging growth to occur in a compact region, rather than over a large area, these capital costs can be reduced substantially (Table 6-19).

Table 6-19. Comparison of Capital Costs of Municipal Infrastructure for a Single Dwelling Unit

Development Pattern	Capital Costs[1] (1987 Dollars)
Compact Growth[2]	$18,000
Low-Density Growth (3 units/acre)	$35,000
Low-Density Growth, 10 Miles from Existing Development[3]	$48,000

Notes
1. Costs include streets (full curb and gutter), central sewers and water supply, storm drainage and school construction.
2. Assumes housing mix of 30% single family units and townhouses; 70% apartments.
3. Assumes housing is located 10 miles from major concentration of employment, drinking water plant and sewage treatment plant.

Source: Frank, 1989

Savings can also be realized at the site level by reducing the costs of clearing and grading, paving and drainage infrastructure. A recent study compared conventional development plans with alternative options designed to reduce the impacts of development on the quality of water resources. The cost savings realized through these alternative options are summarized in Table 6-20. In all site designs, the road width was reduced from 28 feet to 20 feet, lot sizes were reduced or reconfigured to consume less open space, and on-site storm water treatment was provided.

Table 6-20. Impervious Cover Reduction and Cost Savings of Conservation Development

Location	Techniques Used	Impervious Cover Reduction	Cost Savings
Sussex County, DE	1. Reduced street widths 2. Smaller lots 3. Cluster development	38%	52%
New Castle County, DE	4.Houses clustered into attached units around courtyards	6%	63%
Kent County, DE	5. Reduced road and driveway widths 6. Minimum disturbance boundary	24%	39%

Source: Delaware DNREC, 1997

6.2.5 Oil and Hazardous Waste Collection

Providing a central location for the disposal of oil or hazardous wastes protects water quality by offering citizens an alternative to disposing of these materials in the storm drain. Disposal costs vary considerably depending on the size of the program, and what types of wastes are collected. One study estimated the capital costs at approximately \$30,000, with about \$12,000 maintenance for a used oil collection recycling program in a typical MS4 (US EPA, 1998b). This estimate was based on data from the Galveston Bay National Estuary Program. Data from the City of Livonia, Michigan indicates that the cost of hazardous waste disposal averages about \$12 per gallon (Ferguson et al, 1997).

6.2.6 Proper Storage of Materials

Proper storage of materials can prevent accidental spills or runoff into the storm drain. The design of storage structures varies depending on the needs of the facility. There are also training costs associated with the proper storage of materials. Typical cost estimates, based on standard construction data, are \$6 to \$11 per square foot for pre-engineered buildings and \$3.40 to \$5 per square foot for a 6-inch thick concrete slab (Ferguson et al, 1997).

6.3 Benefits of Storm Water BMPs

Although it is possible to estimate the economic benefits of water quality improvement (US EPA, 1983a), it is difficult to create a “balance sheet” of economic costs and benefits for individual BMPs. Ideally, benefits analysis would specify and quantify a chain of events: pollutant loading reductions achieved by the BMP; the physical-chemical properties of receiving streams and consequent linkages to biologic/ecologic responses in the aquatic environment; and human responses and values associated with these changes. However, the necessary data to conduct such an analysis does not currently exist. Instead, the benefits can be outlined in terms of: 1) effectiveness at reducing pollutant loads; 2) direct water quality impacts; and 3) economic benefits or costs.

6.3.1 Storm Water Pollutant Reduction

A primary function of storm water BMPs is to prevent pollutants from reaching streams and rivers. While all BMPs achieve this function to some extent, there is considerable variability between different types of BMPs. The extent of benefits from non-structural BMPs may be more speculative, partly because their ability to influence human behavior is difficult to predict.

A detailed discussion of pollution removal efficiencies for individual structural BMPs is provided in Section 5.5 of this report, so only non-structural BMPs will be reviewed in this section. Unlike structural BMPs, it is generally not possible to associate specific pollutant removal rates with non-structural BMPs, with the exception of street sweeping (Satterfield, 1996). However, some non-structural BMPs are targeted at specific pollutants. Table 6-21 outlines non-structural BMPs believed by designers to be the most effective for removing specific types of pollutants.

Table 6-21. Non-Structural BMPs Suited to Controlling Various Pollutants

Pollutant	Appropriate BMPs	
Solids	Street Sweeping	Land Use Modifications
Oxygen-Demanding Substances	Street Sweeping Education: Storm Drain Stenciling Land Use Modifications	Education: Pet Scoop Ordinance Illicit Connections Eliminated
Nitrogen and Phosphorus	Street Sweeping Education: Pet Scoop Ordinance Land Use Modifications Proper Materials Handling	Illicit Connections Eliminated Education: Lawn Care Materials Storage and Recycling
Pathogens	Illicit Connections Eliminated Land Use Modifications	Education: Pet Scoop Ordinance
Petroleum Hydrocarbons	Street Sweeping Education: Storm Drain Stenciling Proper Materials Handling	Illicit Connections Eliminated Materials Storage and Recycling Land Use Modifications
Metals	Street Sweeping Education: Storm Drain Stenciling Proper Materials Handling	Illicit Connections Eliminated Materials Storage and Recycling Land Use Modifications
Synthetic Organics	Illicit Connections Eliminated Education: Storm Drain Stenciling Proper Materials Handling	Education: Lawn Care Materials Storage and Recycling Land Use Modifications
Temperature	Land Use Modifications	
pH	Illicit Connections Eliminated Proper Materials Handling	Materials Storage and Recycling Land Use Modifications

6.3.1.1 Solids

Both highway runoff and soil erosion can be sources of solids in urban runoff. Street sweeping can reduce solids in urban runoff by removing solids from roadways and parking lots before they can be detached and transported by runoff. The benefits associated with street sweeping depend largely on the climate. In arid regions, airborne pollutants are a serious concern, and there is a long time between storms for pollutants to accumulate[8]. In humid regions, on the other hand, frequent rainfall makes the use of sweepers between storms less practical. In colder

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[8] Therefore, regular sweeping programs in these areas can potentially remove large amounts of solids from roadways.

regions, sweeping is recommended twice per year: once in the fall after leaves fall and once in the spring in anticipation of the spring snowmelt (MPCA, 1989).

Modifying land use to preserve open space and to limit the impervious cover can also reduce solids loads. By preserving open space and maintaining vegetative cover, the amount of land cleared is limited, thus reducing the erosion potential during construction. Natural vegetated cover has less than one percent of the erosion potential of bare soil (Wischmeier and Smith, 1978).

6.3.1.2 Oxygen-Demanding Substances

Since the primary oxygen-demanding substances are organic materials (such as leaves and yard waste), BMPs that target these substances are best suited to reducing the oxygen demand in storm water. BMPs that reduce sediment loads often also reduce the loads of the organic material associated with that sediment. Pet waste is also a significant source of organic pollutants, and its control can reduce the loads of oxygen demanding substances in urban runoff. Finally, programs geared at reducing illegal dumping and eliminating illicit connections and accidental spills of materials can reduce the oxygen demand associated with these sources.

6.3.1.3 Nitrogen and Phosphorus

Nitrogen and phosphorus are prevalent in urban and suburban storm water. Nitrogen and phosphorus are natural components of soil, and can enter runoff from storm-induced erosion. Additional sources include the use of fertilizer on urban lawns and airborne deposition. Street sweeping can reduce nutrient loads by removing deposited nutrients from the street surface. Programs that focus on lawn chemical handling or replacing turf with natural vegetation also act to reduce nutrient loading. Finally, programs that educate the public or industry about illegal dumping to storm drains can result in reducing the nutrient loads associated with dumping chemicals that have high nutrient content. Energy conservation and reduced automobile use can reduce airborne nitrogen deposition.

6.3.1.4 Pathogens

Pathogens, including protozoa, viruses and bacteria, are prevalent in urban runoff. Bacteria can be found naturally in soil, and the urban landscape can produce large loads of bacteria that can be carried by runoff. Dogs in particular can be a significant source of pathogens. Thus, pet scoop ordinances and associated education are effective tools at reducing bacteria in urban runoff. Illicit connections of sewage may also be a source of pathogens, therefore eliminating these sources can effectively reduce pathogens in runoff.

6.3.1.5 Petroleum Hydrocarbons

Petroleum hydrocarbons are present in many chemicals used in the urban environment, from gasoline to cleaning solvents. Since roadways are a major source of petroleum pollution, scheduled street sweeping can be used to remove hydrocarbon build-up prior to storm water runoff. Programs geared at preventing spills of chemicals to the storm drain, either through deliberate or accidental dumping, are effective at reducing hydrocarbon loads. Modifying the way land is developed can reduce hydrocarbon loads on both a site and a regional level by reducing the use of the automobile and replacing impervious surfaces with natural vegetation.

6.3.1.6 Metals

Metals sources in urban runoff include automobiles and household chemicals, which can contain trace metals. Street sweeping can reduce metals loads deposited on the road surface. In addition, programs that focus on reducing dumping and proper material storage can reduce accidental or purposeful spills of chemicals with trace metals to the storm drain system. Finally, modifying land use can reduce metals loads by reducing impervious cover, thus reducing total runoff containing metals, and reducing the roadway length, which is often a source of runoff containing metals.

6.3.1.7 Synthetic Organics

Much of the source of synthetic organics in the urban landscape is household cleaners and pesticides. Thus, education programs geared at reducing chemical and pesticide use, and proper storage and handling of these chemicals, can reduce their concentrations in urban runoff. In addition, land use modifications that replace turf with natural vegetation will reduce pesticide use.

6.3.1.8 Temperature

Most non-structural BMPs are not able to prevent the increase in temperature associated with urban development. One exception is the use of site designs that more closely mimic the natural hydrograph by reducing impervious cover and encouraging infiltration.

6.3.1.9 pH

The primary source of low pH in urban runoff is acid rain, and most non-structural BMPs are not used to treat this problem. BMPs that focus on proper materials handling and disposal can prevent dumping of chemicals with extremely high or low pH, but this is generally not a major problem in urban watersheds.

6.3.2 Hydrological and Habitat Benefits

As reviewed in Chapter 4, one major impact of urbanization is induced through the conversion of farmland, forests, wetlands, and meadows to rooftops, roads, and lawns. This process of urbanization has a profound influence on surface water hydrology, morphology, water quality, and ecology (Horner et al, 1994). In this section, the hydrologic and related habitat impacts are briefly discussed as well as the potential benefits that can be achieved by managing storm water runoff using structural and non-structural BMPs.

Many of these impacts can be directly or indirectly related to the change in the hydrologic cycle from a natural system to the urban system. Figure 4-1 illustrates the fundamental effects that occur along with the development process. In the natural setting, very little annual rainfall is converted to runoff and about half is infiltrated into the underlying soils and water table. This water is filtered by the soils, supplies deep water aquifers, and helps support adjacent surface waters with clean water during dry periods. In the urbanizing conditions, less and less annual rainfall is infiltrated and more and more volume is converted to runoff. Not only is this runoff volume greater, it also occurs more frequently and at higher magnitudes. The result is that less water is available to streams and waterways during dry periods and more flow is occurring during storms. A recent study in the Pacific Northwest found that the ratio of the two-year storm to the baseflow discharge increased more than 20 percent in developed sub-watersheds (impervious cover approximately 50 percent) versus undeveloped sub-watersheds (May et al, 1997).

As a result of urbanization, runoff from storm events increases and accelerates flows, increases stream channel erosion, and causes accelerated channel widening and down cutting (Booth, 1990). This accelerated erosion is a significant source of sediment delivery to receiving waters and also can have a smothering effect on stream channel substrates, thereby eliminating aquatic species habitat. As a result, aquatic habitat is often degraded or eliminated in many urban streams. The results are that aquatic biological communities are among the first to be impacted and/or simplified by land conversion and resulting stream channel modifications. Subsurface drainage systems which frequently serve urbanized areas also contribute to the problem, by bypassing any attenuation achieved through surface flows over vegetated areas.

A unifying theme in stream degradation is this direct link with impervious cover. Impervious cover, or imperviousness, is defined as the sum of roads, parking lots, sidewalks, rooftops, and other impermeable surfaces in the urban landscape. This unifying theme can be used to guide the efforts of the many participants in watershed protection. Figure 6-6 visually illustrates this trend in degradation for a series of small headwater streams in the Mid-Atlantic Piedmont. Here, four stream segments, each with approximately the same drainage area, and subjected to the same physiographic conditions, respond to the effects of increased impervious cover. Similar results have been observed in the Southern United States with studies in Virginia, North Carolina and Georgia evidencing this same decline in fish and macroinvertebrate populations with increasing impervious cover (Crawford and Lenant, 1989; Weaver and Garman, 1994; Couch et al, 1996)

Figure 6-6. Effects of Impervious Cover on Stream Quality

Sensitive Stream →
(Impervious Cover ≤10%)
- *Stable Channel*
- *Excellent Biodiversity*
- *Excellent Water Quality*

← Impacted Stream
(Impervious Cover 10-20%)
- *Channel Becoming Unstable*
- *Fair to Good Biodiversity*
- *Fair to Good Water Quality*

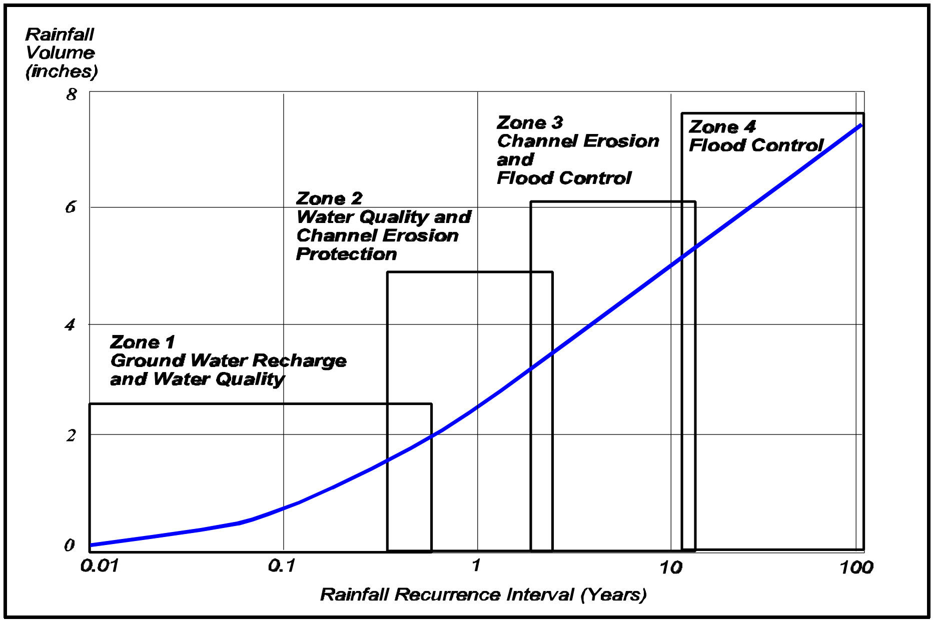
Restorable Stream →
(Impervious Cover ≈40%)
- *Highly Unstable Channel*
- *Poor Biodiversity*
- *Poor to Fair Water Quality*

Non-Supporting Stream →
(Impervious Cover ≈65%)
- *Poor to No Biodiversity*
- *Poor Water Quality*

To mitigate this impact, many local and state governments have required the installation of storm water management detention basins to attenuate this increased runoff volume. It is important to recognize that the change in hydrology caused by urbanization affects more than just a single storm return interval (e.g., the two-year event). Urbanization shifts the entire "rainfall frequency spectrum" (RFS) to a higher magnitude. As illustrated in Figure 6-7, the most significant change is to the smallest, most frequent storms that occur several times per year. In the undeveloped condition, most of the rainfall from these events is infiltrated into the underlying soil. In the developed condition, much of this rainfall is runoff. As the storm return interval increases, the difference between the undeveloped and developed condition narrows. Many jurisdictions only require management of specific storms, usually the two, ten and sometimes, the one hundred year events. The two-year storm is probably the most frequently used control point along this frequency spectrum. Hence, while BMPs may do a fairly good job of managing these specific control points, there have been very few locations across the country that have specific criteria in place to manage storm water over a wide range of runoff events. Claytor and Schueler (1996) describe the RFS as:

> ...classes of frequencies often broken down by return interval, such as the two year storm return interval. Four principal classes are typically targeted for control by stormwater management practices. The two smallest, most frequent classes [Zones 1 and 2] are often referred to as water quality storms, where the control objectives are groundwater recharge, pollutant load reduction, and to some extent control of channel erosion producing events. The two larger classes [Zones 3 and 4] are typically referred to as quantity storms, where the control objectives are channel erosion control, overbank control, and flood control.

Figure 6-7. Stormwater Control Points Along the Rainfall Frequency Spectrum



Source: Claytor and Schueler, 1996

One recent study by MacRae (1997) concluded that stream channels below storm water detention basins designed to manage the two year storm experienced accelerated erosion at three times the pre-developed rate. His findings went on to suggest that the streams were eroding at much the same rate as if no storm water controls existed.

Other jurisdictions have employed an additional level of detention storage above and beyond that required for the two year storm. This concept is often called "extended detention" (ED). McCuen and Moglen (1988) conducted a theoretical analysis of this design criteria based on sediment transport capacity of the pre-developed channel versus that with ED control. This study found ED could produce an 85 percent reduction in the pre-developed peak flow of the two-year storm. What it did not analyze, however, was the erosion potential over a wide range of storms. MacRae (1993) suggested a different storm water control criterion called "distributed runoff control" (DRC). Here, channel erosion is minimized if the erosion potential along a channel's perimeter is maintained constant with pre-developed levels. This is accomplished by providing a non-uniform distribution of the storage-discharge relationship within a BMP, where multiple control points are provided along the runoff frequency spectrum.

6.3.2.1 Benefits of BMPs to Control Hydrologic Impacts

Numerous prior studies have documented the degradation of aquatic ecosystems of urban and suburban headwater streams. As stated above, in general, the studies point to a decrease in stream quality with increasing urbanization. Unfortunately, the benefits of BMPs to protect streams from hydrologic impacts have only recently been investigated and only for a few studies.

Maxted and Shaver (1997), Jones et al (1997), and Horner et al (1997) attempted to isolate the potential beneficial influence of local storm water best management practices on the impervious cover/stream quality relationship. Horner examined the possible influence of stream-side management on stream quality as a function of urbanization. Coffman et al (1998) recently presented data on the potential hydrologic benefits of alternative land development techniques. Called the "Low Impact Development Approach," this methodology attempts to mimic pre-developed hydrology by infiltrating more rainfall at the source, increasing the flow path and time of concentration of the remaining runoff, and providing more detention storage throughout the drainage network, as opposed to a one location at the end of the pipe.

The preliminary findings of Maxted and Shaver, and Jones et al, suggest that, for the BMPs examined, stream quality (as measured by a limited group of environmental indicators) cannot be sustained when compared to reference stream conditions. Jones assessed several BMPs by conducting biomonitoring (fish and macroinvertebrate sampling) above and below BMPs and comparing them to a reference watershed. He found that the biological community tended to be degraded immediately below BMPs as compared to the reference watersheds. One major flaw in the study was the lack of analysis in developed watersheds without BMPs. This would have compared the influence of BMPs on the aquatic community as compared to no BMPs.

Maxted and Shaver examined eight sub-watersheds with and without BMPs. Their study also concluded that BMPs did not adequately mitigate the impacts of urbanization once watershed impervious reached 20 percent cover. While this study was useful in defining the cumulative impacts of BMPs on watersheds, several critical questions remain. First, since no sub-watersheds with less than 22 percent impervious cover were analyzed, little is known about BMP ability to protect the most sensitive species seen in less developed watersheds. Data for sub-watersheds with BMPs was collected approximately three years after data for the sub-watersheds without BMPs, so climatic/seasonal constraints may have affected the outcome as much, or more than the BMPs themselves.

Horner et al (1997) evaluated several sub-watersheds, with varying levels of impervious cover, but only tangentially related the effectiveness of BMPs to protecting stream quality. Horner found that at relatively low levels of urbanization (approximately 4 percent impervious area) the most sensitive aquatic biological communities (e.g., salmonids) were adversely affected, and stream quality degradation (as measured by a several indicators) continued at a relatively continuous rate with increasing impervious area. Horner's study demonstrates a link between urbanization and stream quality in the Puget Sound region, but since the effects of BMPs were not directly assessed, the question of whether BMPs could "raise" these thresholds could not be answered.

Horner did find a positive relationship between stream quality and riparian buffer width and quality. Here, the otherwise direct relationship of degrading stream quality with increasing impervious cover was positively altered where good riparian cover existed. In other words, increasing the buffer width and condition tended to keep the stream systems healthier.

Coffman demonstrated techniques for maintaining pre-developed hydrologic parameters by replicating the curve number and time of concentration. The analysis indicated the amount of storage required on-site to accommodate the change in site imperviousness. The benefits of this type of development, while not yet fully monitored in a field study, are likely to include increased groundwater recharge, reduced channel erosion potential, and decreased flood potential.

One major hydrologic benefit of storm water management structures is the ability to mitigate for the potential flooding associated with medium to larger storms. Storm water detention and retention facilities have been applied in many parts of the country since about 1970 (Ferguson and Debo, 1990). These facilities include wet and dry basins, as well as rooftop and parking lot detention and underground storage vaults. These *storage facilities* attempt to reduce flooding downstream from developments by reducing the rate of flow out of the particular structure being used. Although the rate of flow is reduced, the volume of flow is generally not reduced. Instead, this volume is delivered downstream at a slower rate, and stretched out over a longer time. With the exception of properly design wet ponds, these structures do not provide any water quality benefit beyond the hydrologic modifications. This technique has proved to be a successful method of suppressing flood peaks when properly applied on a watershed-wide basis.

6.3.3 Human Health Benefits

Storm water can impact human health through direct contact from swimming or through contamination of seafood. Most human health problems are caused by pathogens, but metals and synthetic organics may cause increased cancer risks if contaminated seafood are consumed. Mercury, PCBs, and some pesticides have been linked to human birth defects, cancer, neurological disorders and kidney ailments. The risks may be greater to sensitive populations such as children or the elderly. BMPs that reduce pathogens, metals and synthetic organics will help to limit these health risks.

Economic benefits of avoiding human health problems can include swimming and recreation costs, as well as saved medical costs. One study in Saginaw, Michigan estimated that the swimming and beach recreation benefits associated with a CSO retention project exceeded seven million dollars (US EPA, 1998c). As another example, EPA initially estimated that proposed Phase II storm water controls would reduce the cost of shellfish-related illnesses by between $73,000 and $300,000 per year (US EPA, 1997d).

6.3.4 Additional and Aesthetic Benefits

Storm water BMPs can be perceived as assets or detriments to a community, depending on their design. Some examples of benefits include: increased wildlife habitat, increased property values, recreational opportunities, and supplemental uses. Detriments include: mosquito breeding, reduced property values, less developable land and safety concerns. These detriments can be mitigated through careful design.

6.3.4.1 Property Values and Public Perception

The impacts of BMPs on property values are site-specific. The presence of a structural BMP can affect property values in one of three ways: increase the value, decrease the value, or have no impact. BMPs that are visually aesthetic and safe for children can lead to increased property values. A practice becoming more prevalent is to situate developments around man-made ponds, lakes, or wetlands created to control flooding and reduce the impacts of urban runoff. Buffer zones and open areas that control runoff also provide land for outdoor recreation such as walking or hiking and for wildlife habitat. In many cases, developers are able to realize additional profits and quicker sales from units that are adjacent to such areas. A survey of residents in an Illinois subdivision indicates that residents are willing to pay between 5 percent and 25 percent more to be located next to a wet pond, but that being located next to a poorly-designed dry detention basin can reduce home values (Emmerling-Dinovo, 1995).

Safety is also a concern among the public. A childless adult may perceive a wet pond as an amenity, but a family might view it as a potential hazard to children. These concerns can be alleviated using such design features as gently sloping edges, a safety “bench” (a flat area surrounding a pond) and the use of dense vegetation surrounding ponds and infiltration basins to act as a barrier.

Aesthetic maintenance is also important when considering long term impacts on property values. Poorly-maintained wet ponds or constructed wetlands may be unsightly due to excess algal growth or public littering. Wet ponds and constructed wetlands can also become mosquito breeding grounds. However, mosquito problems can usually be reduced or eliminated through proper design and/or organic controls such as mosquito-eating fish. Successful designs avoid shallow or stagnant water, and reduce large areas of periodic drying, as occur in a dry detention basin (McLean, 1995). All BMPs need to have trash and debris removed periodically to prevent odor and preserve aesthetic values.

6.3.4.2 Dual-Use Systems

Since BMPs can consume a large amount of space, communities may opt to use these facilities for other purposes in addition to storm water management. Two examples are "water reuse" ponds and dual use infiltration or detention basins. In one study, a storm water pond was used to irrigate a golf course in Florida, decreasing the cost of irrigation by approximately 85 percent (Schueler, 1994b). In the southwestern United States, BMPs are often completely dry in between rain events. In these regions, it is very common to design infiltration basins or detention basins as parks that are maintained as a public open space (Livingston et al, 1997).

6.4 Review of Economic Analysis of the NPDES Phase II Storm Water Rule

The proposed storm water Phase II rule specifies that Phase II municipalities and operators of construction sites disturbing between one and five acres of land must apply for and receive a storm water permit. To meet this requirement, municipalities must develop a storm water pollution prevention plan that addresses six minimum measures[9]. Operators of construction sites are required to incorporate soil and erosion controls into their construction sites and implement a water pollution prevention plan. The analysis presented here is a summary of the most recent benefit-cost analysis prepared for the proposed Phase II storm water rule (Preliminary draft number 3). In order to address the issues raised in the public comments and during internal review, EPA gathered additional data and information to refine the analysis of potential benefits and costs conducted for the proposed Phase II rule. These data, analyses, and results are described in detail in the Preliminary Draft of the Economic Analysis of the Final Phase II Storm

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[9] The six minimum measures are:

- Public Education and Outreach on Storm Water Impacts
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations (US EPA, 1998c).

Water Rule ("EA"), and are summarized in the sections that follow. All cost and benefit estimates are presented in 1998 dollars.

The reader should note that the Agency continues to revise the analysis based on internal review and new data and information. EPA envisions completing the economic analysis in conjunction with the Storm Water Phase II Final Rule. Hence, all estimates are subject to future refinement.

6.4.1 Analyses of Potential Costs

This section provides an overview of the methodology used to estimate costs and pollutant loading reductions for both municipalities and construction sites subject to the final Phase II rulemaking. The specific components of the analysis are discussed in detail in the Draft Final EA. Current Agency estimates of national compliance costs, which are subject to change, are also provided.

6.4.1.1 Municipal Costs

EPA estimated annual per household program cost for automatically designated municipalities (MS4s) using actual expenditures reported by 35 Phase I municipalities. Based on census data, EPA estimated the Phase II municipal universe to be 5,040 MS4s with a total population of 85 million people and 32.5 million households. An average annual per household administrative cost was estimated to address application, record keeping, and reporting requirements, which was added to the program per household cost to derive a total average per household cost. To obtain the national estimate of compliance costs, the Agency multiplied the estimated total per household compliance cost ($9.09) by the expected number of households in Phase II communities. EPA estimates the national Phase II municipal compliance costs to be approximately $295 million (see Section 4.2.1.3 in the draft EA)[10].

6.4.1.2 Construction Costs

In estimating incremental costs attributable to the final Phase II rule, EPA estimated a per site cost for construction sites of one, three, and five acres and multiplied the cost by the total number of Phase II construction starts in these size categories to obtain a national estimate of compliance costs. The Agency used construction start data from eleven municipalities that record construction start information to estimate the number of construction starts disturbing between one and five acres of land (see Section 4.2.2.1 in the Draft Final EA).

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[10] Estimated annual per household cost of compliance ranged from $0.63 to $60.44. See Section 4.2.1.2 in the Draft Final EA for a discussion of how EPA chose the mean value of $9.09 per household. Note that the estimated per household cost does not include municipal expenditures for post-construction storm water controls.

In estimating construction BMP costs, EPA used standard cost estimates from R.S. Means (R.S. Means, 1997a and 1997b) and created 27 model sites of typical site conditions in the United States. The model sites considered three different site sizes (1, 3, and 5 acres), three slope variations (3, 7, and 12 percent), and three soil erosivity conditions (low, medium, and high). The Agency used a database compiled by the Water Environment Federation (1992) to develop and apply BMP combinations appropriate to the model site conditions. For example, sites with shallow slopes and a low erosivity require few BMPs, while larger, steeper, and more erosive sites required more BMPs. Detailed site plans, assumptions, and BMPs that could be used are found in Appendix B-3 of the Draft Final EA. Based on the assumption that any combination of site factors are equally likely to occur on a given site, EPA averaged the matrix of estimated costs to develop an average cost for one, three, and five acre starts for all soil erodibilities and slopes. The average BMP cost was estimated to be $1,206 for a one-acre site, $4,598 for a three-acre site, and $8,709 for a five-acre site.

Administrative costs for the following elements were estimated per construction site and added to each BMP cost: submittal of a notice of intent (NOI) for permit coverage ($74); notification to municipalities ($17); development of a storm water pollution prevention plan ($1,219); record retention ($2); and submittal of a notice of termination ($17) for a total cost of $1,329 per site. From this analysis, EPA estimated total average compliance costs (BMP plus administrative) for a Phase II construction site of $2,535 for sites disturbing between one and two acres of land, $5,927 for sites disturbing between two and four acres, and $10,038 for sites disturbing between four and five acres of land.

The total per site costs were then multiplied by the total number of Phase II construction sites within each of those size categories to obtain the national compliance cost estimate. EPA estimated construction costs for 15 climatic zones to reflect regional variations in rainfall intensity and amount. Once the Phase II storm water rule is fully implemented, the total annual compliance cost is expected to be approximately $512 million (assuming 109,652 construction starts in 1998).

6.4.1.3 Pollutant Loading Reductions

To estimate municipal pollutant loading reductions for the final Phase II rulemaking, EPA used the results from a 1997 EPA draft report that calculated national municipal loading reductions for TSS based on the NURP study (US EPA, 1997d). To estimate pollutant loading reductions from Phase II construction starts, the U.S. Army Corps of Engineers developed a model based on EPA’s 27 models sites to estimate sediment loads from construction starts with and without Phase II controls (US ACE, 1998). Estimating the pollutant loading reduction for TSS does not capture the full extent of potential loading reductions that result from implementing storm water controls, but provides a minimum estimate of the reductions that may result from the

Phase II rule[11]. EPA also anticipates that the rule will result in reductions in oil and grease, nitrogen, phosphorus, pathogens, lead, copper, zinc and other metals. Estimated annual TSS loading reductions range from 639,115 to approximately 4 million tons for municipalities and 2 million to 8 million tons for construction sites assuming BMP effectiveness of 20 to 80 percent.

6.4.2 Assessment of Potential Benefits

A number of potential problems are associated with assessing the benefits from the Phase II rule, including identifying the regulated municipalities as sources of current impairment to waters and determining the likely effectiveness of various measures; difficulties in water quality modeling; difficulties in modeling construction site BMP effectiveness; and most importantly, the inability to monetize some categories of benefits with currently available data.

The national benefits of Phase II controls will depend on a number of factors, including the number, intensity, and duration of wet weather events; the success of municipal programs; the effectiveness of the selected construction site BMPs; the site-specific water quality and physical conditions of receiving waters; the current and potential use of receiving waters; and the existence of nearby “substitute” sites of unimpaired waters. Because these factors will vary substantially from site to site, data are not available with which to develop estimates of benefits for each site and aggregate to obtain a national estimate. As a result, the Agency developed national level estimates of benefits based largely on a benefits transfer approach. This approach allows estimates of value developed for one site and level of environmental change to be applied in the analysis of similar sites and environmental changes.

6.4.2.1 Anticipated Benefits of Municipal Measures

As part of an effort to quantify the value of the United States’ waters impaired by storm water discharges, EPA applied adjusted Carson and Mitchell (1993) estimates of willingness to pay (WTP) for incremental water quality improvements to estimates of waters impaired by storm water discharges as reported by states in their biennial Water Quality Inventory reports[12]. Potential Phase II benefits are assumed to equal the WTP for the different water quality levels multiplied by the water quality impairment associated with Phase II municipalities multiplied by the relevant number of households (WTP x percent impaired x number of households).

The Carson and Mitchell estimates apply to all fresh water, however it is not clear how these values would be apportioned among rivers, lakes and the Great Lakes. Lakes are the water

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[11] To date, there are no national studies that estimate pollutant loading reductions due to the implementation of municipal storm water controls for the other pollutants found in storm water runoff and discharges.

[12] EPA adjusted the WTP amounts to account for inflation growth in real per capita income, inflation, and a 30 percent increase in attitudes towards pollution control.

bodies most impaired by urban runoff and discharges, followed closely by the Great Lakes and then rivers. Hence, EPA applied the WTP values to the categories separately and assumed that the higher resulting value for lakes represents the high end of the range and the lower resulting value for rivers represents the low end of a value range for all fresh waters (i.e. high end assumes that lake impairment is more indicative of national fresh water impairment while low end assumes that river impairment is more indicative).

The extent to which impairment will be eliminated by the municipal measures is uncertain; hence, estimates are adjusted for a range of potential effectiveness of municipal measures. EPA expects that municipal programs will achieve at least 80% effectiveness, resulting in estimated annual benefits from fresh water use and passive use in the range of $67.2 to $241.2 million. The potential value of improvements in marine waters and human health benefits have not been quantified at this time.

6.4.2.2 Anticipated Benefits of Construction Site Controls

EPA estimates the benefits of construction site controls using a benefits transfer approach applying WTP estimates for an erosion and sediment control plan from Paterson et al (1993) contingent valuation (CV) survey of North Carolina residents. The adjusted WTP estimates are intended to reflect potential benefits of erosion and sediment control programs that protect all lakes, rivers, and streams. In order to transfer adjusted WTP results to estimate the potential benefits of the Phase II rule, EPA calculated the percentage of Phase II construction starts that are not covered by a state program or CZARA for each state. This percentage is multiplied by the number of households in the state and the adjusted mean WTP of $25. The results were then summed across all states and indicate that WTP for the erosion and sediment controls of the Phase II rule may be as high as $624.2 million per year.

6.4.3 Comparison of Benefits and Costs

EPA estimates the total compliance costs of the rule to be $807.2 million. The largest portion of the total cost, $512 million, is associated with erosion and sediment controls at construction sites. EPA was able to develop a partial monetary estimate of expected benefits of both the six minimum municipal measures and the construction components of the rule. The sum of these benefits ranges from $700 to $865 million annually [assuming 80 percent effectiveness of municipal programs and using the mean WTP ($25) from Paterson]. The largest portion of benefits, $624 million, are associated with erosion and sediment controls for construction sites.

6.5 Financial Issues

Effective storm water programs require both the existence of well-performing, cost-effective BMPs and sufficient funding. Financing issues are discussed extensively in other Agency reports and only briefly reviewed below.[13] Section 6.5.1 focuses on financing options for municipal storm water programs but does not discuss regulatory impacts on municipalities.

6.5.1 Municipal Financing of Storm Water Programs

Around the nation, local government general tax funds are the most commonly used source of funding for storm water programs. However, this may be the least suitable source of storm water program or maintenance funding. General tax revenues originate at a number of sources and are used to finance an equally diverse number of public programs, including education, police and fire protection, civil and criminal courts, and social and economic support programs. Storm water programs and maintenance must compete against a large number of other vital public programs for a very limited number of tax dollars. This problem has been compounded in recent years by tax caps and the public's general opposition to new or higher taxes.

The unreliability of general tax funds has led many communities around the country to develop storm water utilities. Storm water utilities rely on dedicated user charges related to the level of service provided. Charges are typically paid by property owners and managed in a separate enterprise fund. A variety of methods are used to determine charges, but are usually based on some estimate of the amount of storm water runoff contributed by the property, such as the total impervious surface or a ratio of impervious surface to total property area. Generally a flat rate is charged for residential properties.

There are several advantages of using utility fees to finance storm water programs. Unlike general tax revenues, utility charges are a dedicated, stable, and predictable source of funds and are not subject to state "tax cap" limitations. Also, because charges are based on the user's contribution to storm water runoff, it is often seen as more equitable or fair. Finally, utility fees provide a mechanism to incorporate economic incentives for implementation of on-site storm water management through reduced charges. For example, credits or discounts are often provided for on-site retention of storm water by nonresidential property owners. Providing such incentives creates greater flexibility by allowing each user to choose the cheaper option - paying the utility charge or implementing on-site controls. Storm water utilities are now well established as an effective financing option. As of 1991, over 100 communities across the country had instituted storm water utilities (US EPA, 1994a).

Similar to utility fees, the use of inspection or permit fees to help publicly finance storm water programs represents a relatively new application of an established component of government revenues. Often, these fees are associated with the issuance of a permit, such as a

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[13] EPA has prepared publications to assist local governments in planning for program funding (US EPA, 1994b). More recently the Agency has established an internet site with current information, the "Environmental Finance Information Network." The website address is http://www.epa.gov/efinpage/efin.htm .

building permit, clearing permit, storm water permit, or sewer connection permit. A permit program based upon fees for annual inspections, such as a storm water discharge or storm water operating permit, can provide a continuing source of funds. However, many permit or inspection fees are a one time charge, typically when the facility is first constructed. These are generally not a good funding source for continuing storm water system maintenance.

Finally, the use of dedicated contributions from land developers may be used to finance public maintenance of storm water systems. Under this program, the local government assumes the operation and maintenance of a storm water system constructed as part of a private development. All or a portion of the estimated required funding for the O&M is obtained through a one-time contribution by the land developer to a dedicated account which is controlled by the local government. Often the developer is responsible for O&M during a “warranty period,” frequently the first two years. Dedicated contributions provide a secure, dedicated funding source that is not subject to state tax cap limits. A disadvantage is that dedicated contributions are only applicable to new storm water systems.

6.6 Summary

The use of BMPs to control storm water runoff and discharges where none previously existed will ultimately result in a change in pollutant loadings, and there are indications that in the aggregate BMPs will improve water quality. The actual manner in which the loadings reductions are achieved will depend on the BMPs selected, which will determine the associated costs. The physical-chemical properties of receiving streams and consequent linkages to biologic/ecologic responses in the aquatic environment, and human responses and values associated with these changes will determine the benefits.