

## **Chapter 6**

### **Management of Nonpoint Source Pollution and Stormwater Runoff**

**Nonpoint source pollution has become an overbearing problem to all water bodies across the Nation. Due to their dispersed nature, nonpoint sources are not easily identified and have become the fastest growing threat to the health and stability of our surface waters.**

#### **6.1 Introduction**

The Clean Water Act defines pollution as “man-made or man-induced alterations of the chemical, physical, biological, and radiological integrity of the water”<sup>1</sup>. Nonpoint source pollution is a direct result of activities taking place on land or from a disturbance of a natural stream system. Natural pollutant agents such as flow alteration, loss of riparian zone, physical habitat alteration, and the introduction of nonnative species to a water system produce nonpoint source pollution byproducts directly correlated to man-made alterations. According to the Ohio EPA’s Division of Surface Water, nonpoint sources are classified into two categories: polluted run-off and physical alterations (a result of how water moves over land surfaces or infiltrates into the ground).

All land use activities have the potential to pollute our critical water resources. Loose sediment, pesticides and fertilizers, petroleum products, harmful bacteria, pet waste, septage from failing HSTS’s, and trash are all common sources of nonpoint source pollution. As water moves across land surfaces, pollutants are carried away and deposited in our surface waters via storm sewers or direct deposition.

The amount of impervious surfaces increases as land transitions into urbanized settings. Associated with development, roadways, parking lots and household driveways prohibit the infiltration of stormwater into the ground, forcing rainwater to linger on the surface. Eventually the water will run off the surface and carry with it pollutants, such as gasoline, vehicle oil, diesel fuel, and other toxic chemicals, on its way to a storm sewer. Once in the storm sewer system, stormwater gathers velocity as it is channeled through straight conduits, and empties into a nearby surface water. Landscaping and poor housekeeping practices produce potential nonpoint sources of pollution in urban runoff. Fertilizers, herbicides, and pesticides contain nitrogen and phosphorous that both lead to water quality impacts. When applied incorrectly and/or abundantly, these chemicals can easily wash away during a rain event and flow into storm sewers and receiving surface waters. Although aquatic plants thrive on phosphorus, too much phosphorus can cause algal bloom formation, which in turn can harm fish populations. These blooms decrease the amount of light entering the water and eventually decreases the amount of food available for some organisms.

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<sup>1</sup> Section 502(19)

Agricultural practices are not exempt from falling under the nonpoint source pollution category. Historically, the agricultural community has been cited as a leading contributor of sediment, nutrients, and chemicals (fertilizers and pesticides) in surface waters. Unrestricted livestock access to streams has forced stream banks to erode, adding extra sediment to streams. Land application of manure and the use of pesticides, fertilizers, and herbicides, when carried away by water, add excess nutrients and organics that impact surface water quality. However, with better conservation practices in place, their contribution has moderately decreased.

The lack of adequate erosion control measures at construction sites also increases the amount of sediment entering our surface waters. Because soil is exposed during the stages of development, it is easily carried away during a rain event, collecting other pollutants on its way to a storm sewer system. Increasing the sediment load into water systems is proven to be detrimental to the aquatic ecosystems. When sediment is suspended in water, it prohibits light penetration, thus impairing photosynthesis, modifies oxygen demands, and reduces the food supply for many organisms. As sediment settles, it destroys fish populations by covering spawning beds, and increases the potential for flooding by reducing a water body's holding capacity.

### **6.3 Policy Implementations**

Two laws exist to aid in controlling runoff: one focusing on point source pollution and the second focusing on nonpoint sources. Under the Clean Water Act's (CWA) National Pollution Discharge Elimination System (NPDES) Program, stormwater runoff and point sources are addressed. Meanwhile, nonpoint source programs are covered under Section 319 of the CWA. According to the Ohio EPA, the "Total Maximum Daily Load (TMDL) Program focuses on identifying and restoring polluted rivers, streams, lakes, and other surface waterbodies".

#### **6.3.1 NPDES Program**

The Clean Water Act (CWA) of 1972 was established to enforce regulations under the Federal Water Pollution Control Act of 1948. The CWA was written with the intent to "restore and maintain the chemical, physical, and biological integrity of our nation's waters<sup>3</sup>" by achieving two goals<sup>4</sup>:

- to eliminate the discharge of pollutants into surface waters; and
- to achieve a level of water quality that allots the protection and propagation of fish, shellfish, and wildlife and for recreation in and on the water

The CWA also contains a national policy measure that states the "discharge of toxic pollutants in toxic amounts" is prohibited<sup>5</sup>.

The CWA's original intent was to combat industrial and municipal waste discharging into surface waters. The Act prohibits any discharge of pollutants into waters of the United States, unless authorized by an NPDES permit. The NPDES program tracks point sources, monitors discharges from permitted sources, and minimizes the amount of

pollutants discharged. However, as pollution measures were implemented and redefined, newer, more diffuse sources of water pollution were emerging and causing significant water quality impairments. Stormwater runoff, in connection with urban land use practices and construction site activity, and agricultural practices have been identified as the new causes of water quality impairments.

In 1987, the CWA was amended by Congress to establish regulations and issue permits for addressing non-agricultural stormwater discharges. The amendment created a phased implementation strategy for the NPDES Permit. In 1990, Phase I of the plan was activated, followed by Phase II in 2002.

### **6.3.2 Phase I**

Phase I of the two-phase strategy was established in 1990 and depends on the NPDES permit coverage to address storm water runoff from:

- Medium or Large Municipal Separate Storm Sewer Systems (MS4s) serving a population of 100,000 or more;
- Construction activity disturbing 5 acres of land or more; and
- Ten categories of industrial activity listed in 40 CFR Subpart 122.26(b) (14).

Phase I entities are required to obtain an NPDES stormwater permit and implement stormwater pollution prevention measures or management programs that efficiently reduce or prevent the discharge of pollutants to surface waters. Under Phase I, Best Management Practices (BMPs) are encouraged to help achieve site-specific NPDES requirements.

### **6.3.3 NPDES Phase II**

The second phase of the stormwater water regulation expanded Phase I to require small sized MS4s in urbanized areas as well as construction site operators to apply for NPDES permitting. Phase II was designed to create programs and practices to curb stormwater runoff. The phase covers two classes of stormwater dischargers:

- Operators of small MS4s located in “urbanized areas” as defined by the Bureau of Census; and
- Operators of construction sites that disturb 1-5 acres of land.

In addition, the following federal, state, local, and tribal agencies are regulated under this phase:

- US Department of Defense;
- State Hospitals;
- State Prisons;
- State Departments of Transportation (not previously covered under Phase

- D);
- Universities; and
- Tribal Areas identified as a small MS4owner/operator.

Phase II of the program was finalized in December 1999 and the Ohio EPA passed the final permit requirements to meet the Phase II rule in December 2002. Under the finalized phase, the following 6 minimum control measures must be addressed as requirements of the program:

- Public Education and Outreach;
- Public Involvement and Public Participation/Involvement;
- Illicit Discharge Detection and Elimination;
- Construction Site Runoff Control;
- Post- Construction Runoff Control; and
- Pollution Prevention/Good Housekeeping.

Many of the communities in the Eastgate Planning Area implement Stormwater Management Plans (SWMPs) to fulfill their Phase II requirements. **Table 6-1** summarizes the entities within Mahoning and Trumbull Counties having SWMPs, with both counties having regional programs in place that include joint permittees.

Table 6-1: Phase II Stormwater Regulated Entities

<b>Mahoning County</b>	<b>Trumbull County</b>
Mahoning County*	Trumbull County**
Austintown Township*	Bazetta Township**
Beaver Township*	Brookfield Township**
Boardman Township*	Champion Township**
Canfield Township*	Howland Township**
Coitsville Township*	Hubbard Township**
Poland Township*	Liberty Township**
Springfield Township*	Newtown Township**
Mill Creek MetroPark*	Vienna Township**
City of Struthers	Warren Township**
City of Campbell	Weathersfield Township**
City of Canfield	City of Cortland**
Village of New Middletown	City of Girard**
Village of Poland	City of Hubbard**
	City of Newton Falls**
	Village of McDonald**
	City of Niles**
	City of Warren

\* Joint, regional plan with the Mahoning County Engineers Office as the lead role.

\*\* Joint, regional plan with Trumbull County with Trumbull County Soil and Water implementation.

Under the State of Ohio’s Phase II regulations, operators of construction sites are

required to implement site BMPs as required by the Ohio EPA General Permit for Storm Water Discharges Associated with Construction Activity. In addition, Phase II designated communities are required to adopt a local ordinance or regulatory mechanism as stringent or more stringent than OEPA requirements addressing storm water runoff from earth disturbing construction projects resulting in the disturbance of one or more acres of land. The Boards of Commissioners in Mahoning and Trumbull Counties, by the authority given under O.R.C 307.79, as modified by H.B. 411, adopted Erosion and Sediment Control Rules applicable to the entire unincorporated area of each county. Administration of the Rules was assigned to the County Engineers office in Mahoning County and the Soil and Water Conservation District Office in Trumbull County. Subsequently, each zoned, Phase II designated township began adopting local zoning legislation requiring compliance with the Rules prior to the issuance of a zoning permit.

An Erosion and Sediment Control (E&SC) Manual is a tool created by counties and utilized to assist developers with compliance in storm water management regulations at construction sites. The purpose of an E&SC manual is to provide detailed and supportive information and examples allowing developers, designers, contractors, builders, and planners the appropriate information necessary to address state and local requirements for construction site runoff and post-construction stormwater management. BMPs are a component of an E&SC and must be discussed thoroughly (standards and specifications) and submitted with a construction site E&SC plan. A BMP's goal is to prevent the discharge of pollutants into a surface water. In addition, the Ohio Department of Natural Resources Division of Soil and Water created the 2006 edition of the Rainwater and Land Development Manual as a guide for BMP selection and preparation of E&SC plans.

The Illicit Discharge Detection and Elimination minimum control measure is central and interrelated and a component of the other five. This control measure requires regulated communities develop a storm sewer system map detailing the locations of MS4 discharges into natural drainageways or "waters of the state". In addition, communities must provide a map and a list by address of residences operating a home sewage treatment system that discharges to the MS4 otherwise referred to as off-lot septic systems. Communities are required to adopt ordinances prohibiting non-storm water discharges to their MS4. However, many communities such as county and township government lack the legal authority to adopt such regulations. Therefore, in Mahoning and Trumbull Counties, a protocol has been established utilizing existing authority given by the state legislature. Discharge of septic or grey water from HSTS's is currently enforced under ORC 3745, 3701.352 and OAC 3701-29, illicit plumbing connections are enforceable under 4104.41, 4104.43 and Chapter 6 of the Ohio Plumbing Code, litter is enforceable under ORC 3767, solid waste and open dumping by ORC 3734 and OAC 3745 and spills by ORC 745 and ORC 6111. Finally, as mentioned above, sediment discharge is regulated under ORC 307.79 for the unincorporated area of the counties.

MS4 outfalls must be mapped and observed for flow. Each outfall location must be observed once throughout the permit term in a dry weather screening process following 72 hours without a rain event. Flows composed entirely of storm water such as sump pump discharge or infiltration into the storm sewer system are possible during such an

observation. Sampling of flows is not required by the permit but will be performed in potential enforcement cases.

The Ohio Agricultural Pollution Abatement Rules, passed by the legislature in 1979, handles nonpoint source sediment pollution from agricultural communities. Additionally, the 1987 Water Quality Act exempted nonpoint source pollutants from agricultural activities, (i.e. runoff from orchards, cultivated crops, pastures, and range lands) from storm water regulations. The Chief of the Ohio Department of Natural Resources (ODNR) Division of Soil and Water Conservation is responsible for handling the agricultural community's. Through an agreement with local Soil and Water Conservation Districts (WCD), the local District's Board of Supervisors can address agricultural nonpoint source pollution complaints from landowners.

Due to the fact the Ohio EPA is empowered to regulate urban stormwater, the agricultural communities in our region work with the Mahoning County Soil and Water Conservation District and the Trumbull Soil and Water Conservation District (respectively) to address and manage sediment and nutrient issues through various BMPs. Several BMPs encouraged include conservation tillage, contour strip cropping, the establishment of buffer or filter strips along streams, and exclusionary fencing for livestock. Numerous governmental programs, such as the Ohio EPA's 319 Grant and funds from the U.S. Department of Agriculture, are accessible to help farmers design and pay for BMPs that prevent and control nonpoint source pollution on their lands.

#### **6.4 Ohio Nonpoint Source Pollution Control Program**

Controlling nonpoint source pollution is typically addressed by voluntary actions. The Ohio EPA developed a Nonpoint Source Management Plan that was adopted by the US EPA in June of 2014. The plan provides goals, guidance and activities to help reduce the impacts of nonpoint source pollution such as hydromodification, habitat alteration, polluted runoff, and provides suggestions for invasive species management and innovative storm water management practices. A copy of the plan can be found at the following link, <http://www.epa.state.oh.us/dsw/nps/index>. Management measures listed in the plan are eligible for Ohio EPA grant monies as well as other state and/or federal programs.

##### **6.4.1 Total Maximum Daily Load (TMDL)**

Established under the CWA's Section 303(d), the TMDL program emphasizes identifying and restoring polluted rivers, streams, lakes, and other surface waters. A TMDL is a "written, quantitative assessment of water quality problems in a waterbody and contributing sources of pollution"<sup>6</sup>. It specifies the amount a pollutant needs to be reduced to meet water quality standards (WQS), allocates pollutant load reductions, and provides the basis for taking actions needed to restore a waterbody. The TMDL Program is a watershed approach to quantifying and reducing point and nonpoint sources of pollution in impaired surface waters. The program builds on current "monitoring, modeling, permitting, and grant programs and works"<sup>7</sup> within their "five-year monitoring strategy"<sup>8</sup>.

Ohio is required to submit a list of prioritized impaired waters to the U.S. EPA for

approval. This list identifies the waters in Ohio that are currently impaired and require TMDL development to achieve Ohio’s water quality standards. Based on information provided in the Ohio EPA’s 2006 303(d) List of Impaired Waters, the following surface waters are scheduled for field monitoring and projected TMDL reporting:

- Upper Mahoning River: 2006-2007 (field survey), 2011 (TMDL report);
- Lower Mahoning River: 2013-2014 (field survey), 2015 (TMDL report);
- Upper Grand River (headwaters to upstream Rock Creek): 2007 (field monitoring), 2013 (TMDL report);
- Pymatuning River: 2008-2009 (field survey), “In preparation” (TMDL Report)
- The Mahoning River Watershed has a fecal coliform TMDL report that was approved by the US EPA in 2005.

#### **6.4.2 CWA Section 319**

The CWA was amended in 1987 to include Section 319, which established a Nonpoint Source (NPS) Management Program that recognized the need for greater leadership to focus on State and local NPS efforts. Section 319 enables states to receive grant money to support a variety of activities such as providing technical and financial assistance, education, training, technology transfer, demonstration projects, and monitoring to assess the success of specific nonpoint source implementation projects.

The Ohio EPA is the designated water quality agency in Ohio and is responsible, through the Division of Surface Water, for administering the 319 Grant Program. Since 1990, Ohio EPA has annually applied for, received and distributed 319 Grant funds to correct water quality impairments to Ohio's surface and groundwater resources caused by nonpoint sources. Education, public participation, and implementation based on innovation, cost-sharing and voluntary compliance with locally developed 9-Element Nonpoint Source Implementation Strategy (NPS-IS) Plans are the focal point of the Ohio 319 Grant Program.

#### **6.4.3 Water Pollution Control Loan Fund (WPCLF)**

The WPCLF program is administered through the Ohio EPA and provides financial and technical assistance to public or private entities for planning, design, and construction of projects to protect or improve water quality. The program is a revolving fund, operating in perpetuity, providing low interest rate loans and other forms of assistance. The mission of the WPCLF program is *“To benefit Ohio’s water resources and public health by providing lower cost financing, economic incentives, and project assistance for public and private organizations and individuals”*<sup>2</sup>. WPCLF funds can be used for wastewater collection and treatment (including HSTSs via the local health departments), storm water activities, and nonpoint source water pollution projects. The program provides specialized

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<sup>2</sup> Ohio EPA’s Water Pollution Control Loan Fund: 2018 Draft Program Management Plan, p.5.

services to small and hardship communities.

Examples of projects that can be funded through WPCLF include<sup>3</sup>:

- Publicly-owned wastewater treatment plant and sanitary sewer system construction projects, combined sewer overflow controls, sewer system rehabilitation, and infiltration/inflow correction;
- Publicly-owned septage receiving facilities, brownfields, landfill closure or remediation, septic system improvements, urban storm water runoff, stream corridor restoration, forestry best management practices (BMPs), development BMPs, agricultural runoff controls, source water/well head protection, “green” infrastructure, and other nonpoint source pollution control projects as allowed under the Clean Water Act.

#### **6.4.4 Water Resource Restoration Sponsorship Program (WRRSP)**

The WRRSP program is a part of WPCLF used to address a limited and under-assisted categories of water resource needs in Ohio through direct WPCLF Loans<sup>4</sup>. The goal of the program is to “counter the loss of ecological function and biological diversity that jeopardize the health of Ohio’s water resources” by “providing funds, through WPCLF loans, to finance the implementation of projects that protect or restore water resources, by ensuring either maintenance or attainment of General Warmwater Habitat or higher designated aquatic life uses under Ohio Water Quality Standards”<sup>5</sup>. Activities fundable under WRRSP must focus on biological habitat issues and can range from preservation/protection of stream/aquatic habitat to intensive repair and recovery of such impaired habitats<sup>6</sup>. Entities applying for WPCLF monies receive a discounted loan interest rate should they identify and sponsor a WRRSP project.

#### **6.4.5 Environmental Quality Incentives Program (EQIP)**

The Natural Resources Conservation Service (NRCS) offers the EQIP program to agriculture producers, on a voluntary basis, who wish to invest in natural resource conservation solutions that can improve and protect air and water quality, and lead to healthier soil and wildlife habitat. NRCS provides agricultural producers financial, cost sharing and one-on-one assistance to plan and implement conservation BMPs such as livestock exclusionary fencing, prescribed grazing, cover crops, nutrient management, and irrigation.

The EQIP program begins with an agricultural conservation plan, developed with the help of NRCS. Moving forward, the conservation plan provides guidance for which conservation practices best meet the producers’ needs. NRCS offers approximately 200 practices to utilize, depending upon specific land needs. All practices are geared towards

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<sup>3</sup> Ibid, p.2.

<sup>4</sup> Ibid, p. L-1.

<sup>5</sup> Ibid.,

<sup>6</sup> Ibid.

providing a wide range of conservation methods for working farms, ranches, and forest managers. Local NRCS field offices have technical resource guides specific to the geographic area for which they are prepared. A list of NRCS approved conservation practices can be found at the following link, [https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/technical/cp/ncps/?cid=nrcs143\\_026849](https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/technical/cp/ncps/?cid=nrcs143_026849).

## 6.5 Regional Policy Recommendations

Several nonpoint source management programs were identified for implementation and continuation by local and county agencies in the Eastgate planning area. Recommendations for this chapter echo those found within other chapters of the AWQMP and reinforce action items found within the region's watershed action plans and 9 Element NPS-IS plans.

**Recommendation 6-1: Both counties and their zoned communities are encouraged to adopt and implement riparian setbacks on all streams, rivers, and their tributaries. Because flowing water does not follow political boundaries, it is important for communities that share a common water course work together to create uniform language. Uniform Language will help prevent downstream flooding and ensure the health of the entire watershed.**

Riparian setbacks have been identified as non-structural BMPs in the SWMPs. When the NPDES Phase II regulations were finalized in December of 1999, 6 minimum control measures were required, of which "postconstruction runoff control" measures were identified. Section 3.2.5.2.3.1 of both county's Phase II, SWMPs, require "policies or ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soil and vegetation". Riparian setbacks are just one tool utilized to fulfill this requirement.

The purpose of a riparian setback ordinance is twofold. When properly applied, a setback protects the health, safety, and welfare of residents, prevents property damage or loss due to flooding and erosion, and protects the water quality of the creeks, streams, and rivers within a watershed system. The second purpose of riparian setback ordinances is not to make lots unbuildable, but to regulate uses of riparian areas and limit development within specific distances of streams. By creating setbacks, the riparian area can naturally slow stormwater, store this water, and release it over time, thus providing cost effective flood and erosion control and water quality protection.

Educational programs and workshops are a crucial component to making riparian setbacks acceptable to officials and residents. Many misconceptions regarding the ordinance are common. Township officials and residents need to be assured that riparian setbacks are designed with the landowner as well as the environment in mind.

**Recommendation 6-2: Developing communities within the Eastgate Planning Area are encouraged to consider incorporating low impact development techniques within their**

**subdivision or zoning regulations to enhance stormwater management within the watersheds.**

A well-designed conservation development benefits the whole community and the watershed it resides in via its built-in stormwater management techniques. Through the practice of reducing the amount of impervious surface cover (road surfaces) and land preservation, natural stormwater infiltration can occur. By instilling these requirements in a development, the amount of stormwater runoff exiting a conservation development is reduced, decreasing the chances the new development will add to downstream flooding problems. The preserved open space areas set aside within a conservation development naturally help control the flow of stormwater by reducing the volume of stormwater runoff and by cleaning the stormwater during infiltration. Unlike traditional subdivision construction, where engineered sediment and erosion control measures are utilized, a conservation development relies on grassy swales (as road ditches) instead of curb and gutter techniques to catch soil runoff from land disturbing activities.

Subdivision regulations are created, adopted, and enforced by county planning commissions for unincorporated areas and by the municipalities for incorporated areas. Conservation design developments can be required by both city and village zoning districts. Zoned townships within the counties can adjust their zoning regulations to include conservation design development.

**Recommendation 6-3: The Ohio EPA is encouraged to follow up on the actions and recommendations drinking water suppliers list in their Source Water Assessment and Protection (SWAP) program as steps to be taken to reduce the risk of contaminating public drinking water source.**

The Ohio EPA Division of Surface Water is responsible for restoring and maintaining the quality of Ohio's rivers and streams, while the Division of Drinking and Ground Water informs citizens of where their drinking water comes from (surface or ground sources) and informs Ohio's citizens of whether their drinking water is safe to drink. The Ohio EPA is encouraged to develop a system to monitor the progress of public drinking water suppliers in their ability to address the protective strategies mentioned in their SWAP. Meanwhile, each drinking water supplier is encouraged to follow the recommendations within their SWAP to protect not only their asset, but to protect the public's health and the quality of their supply source.

**Recommendation 6-4: Nine-Element Nonpoint Source Implementation Strategic Plans (NPS-IS) need to be created for all major watersheds and sub-watersheds within the Eastgate Planning Area.**

Several watersheds within Eastgate's Planning Area have watershed action plans and received conditional endorsement from the Ohio EPA. However, these plans have been replaced with the NPS-IS plans. If an entity is seeking 319 Grant funds, a NPS-IS plan either needs to be endorsed or in progress to apply for the program.

**Recommendation 6-5: Public Drinking Water Suppliers are strongly encouraged to preserve any and all lands surrounding not only their drinking water sources, but those lands**

**immediately surrounding the rivers, streams, and tributaries to the surface water source.**

Many impacts to surface water are in the form of nonpoint source pollution. Each SWAP provides strategies and recommendations public water suppliers can take to minimize impacts to their surface water. One such recommendation includes purchasing the lands adjacent to the drinking water sources. By protecting the lands surrounding the source, a buffer is created to help filter pollution before it enters the waters. Although protection of immediate, adjacent lands is important, many pollutants find their way into our surface drinking water via a tributary.

**Recommendation 6-6: Although agricultural activities are exempt from stormwater regulations, several BMPs should be carefully selected to not only protect the water bodies, but to allow farmers to continue with their respective business.**

As noted in this chapter, many of the waterways located in the rural portions of each county have been impacted by agricultural activity. It has been recognized by the watershed action plans that through funding, cooperative agreements, and education a balance between water quality and agricultural activity can be reached. This plan encourages the local SWCDs to continue educating local farmers on the BMPs available to them at no cost. Additionally, where a cost to implement a BMP is involved, local SWCDs are encouraged to continue reapplying for Section 319 Grant funding to help farmers implement BMPs. In the same turn, the Ohio EPA is encouraged to continue the 319 program to offer cost sharing benefits for farmers for the purchase of conservation tillage equipment, riparian planting, and animal exclusionary fencing. Other funding sources available for BMPs include the Environmental Quality Incentives Program (EQIP) from the Natural Resource Conservation Service (NRCS) for farmers to install conservation practices.