



Water Year 2025 Annual Stormwater Report

Douglas County

Prepared for:

Nevada Division of Environmental Protection
Bureau of Water Quality Planning

Contact:

Courtney Walker, Stormwater Program Manager
Douglas County Community Development
Stormwater Division
1120 Airport Road, C2
Minden, NV 89423
(775) 782-6215
cwalker@douglasnv.us

Submitted:

March 13, 2026

Table of Contents Page

List of Acronyms	iii
1.0 BACKGROUND	1
2.0 ACCOMPLISHMENTS SUMMARY	1
2.1 Credit Declaration and Award	3
2.2 BMP RAM Inspection Results	4
2.3 Parcel BMP Inspection Results	6
2.4 Road RAM Assessments	6
3.0 STORMWATER LOAD REDUCTION PLAN	6
3.1 Progress toward 2022 Target Milestone	6
3.2 Progress toward 2026 Five Year Milestone	7
4.0 FISCAL ANALYSIS	8
4.1 Budget (total and annual expenditures to implement, operate, and maintain)	9
4.2 Finance Plan (anticipated and targeted funding sources)	9
5.0 BARRIERS	10
6.0 BASELINE DISCREPENCIES	10

List of Acronyms

BMP	Best Management Practices
BMP RAM	Best Management Practices Rapid Assessment Methodology
CAP	Credit Accounting Platform
CICU	Commercial, Institutional, Communications, Utilities
ECP	Erosion Control Project
EIP	Environmental Improvement Program
FSP	Fine Sediment Particles
ILA	Interlocal Agreement
LCCP	Lake Clarity Crediting Program
MFR	Multi-family Residential
NDEP	Nevada Division of Environmental Protection
NDOT	Nevada Department of Transportation
O&M	Operations and Maintenance
PLRM	Pollutant Load Reduction Model
RAM	Rapid Assessment Methodology
Road RAM	Road Rapid Assessment Methodology
RSWMP	Regional Stormwater Monitoring Program
SFR	Single-family Residential
SLRP	Stormwater Load Reduction Plan
SNPLMA	Southern Nevada Public Lands Management Act
SWQIC	Storm Water Quality Improvement Tool
TMDL	Total Maximum Daily Load
TN	Total Nitrogen
TP	Total Phosphorus
TRPA	Tahoe Regional Planning Agency
WQIP	Water Quality Improvement Project
WY	Water Year (October 1 – September 30)

1.0 BACKGROUND

The purpose of this report is to comply with Section IV of the 2022-2026 Interlocal Agreement to Implement the Lake Tahoe Total Maximum Daily Load (ILA), executed on October 7, 2021. This report summarizes Douglas County's load reduction and maintenance activities undertaken in Water Year 2025 (WY2025) to try and meet the 2025 credit milestone of 135 credits established in the ILA. Douglas County met the WY2025 credit milestone (needed 135 credits, obtained 231 credits). A total of 16 credits were distributed to NDOT in WY2025 as explained below, leaving Douglas County with 215 credits for WY2025. Douglas County entered into an updated ILA October 1, 2021 that is valid until September 30, 2026 for water years 2022-2026.

2.0 ACCOMPLISHMENTS SUMMARY

In order to enhance the consistency of efforts made basin-wide, Douglas County continues to actively participate in the Stormwater Quality Improvement Committee (SWQIC), which identifies Environmental Improvement Program (EIP) funding priorities; Implementer Stormwater Monitoring (IMP) group, which is a part of the Regional Stormwater Monitoring Plan (RSWMP); and the Parcel BMP Working Group.

To work towards meeting the 2025 milestone of 135 credits, Douglas County registered the load reduction activities listed in Table 1 (below). These include an updated Stateline Stormwater registration accounting for several parcel BMPs that were recertified, for a total of 106 credits. 16 of the 51 credits were distributed to Nevada Department of Transportation (NDOT) in WY2025 according to an agreement that was reached between Douglas County and NDOT. This leaves Douglas County with 215 credits to declare in WY2025. Douglas County will be able to continue to perform maintenance within registered catchments to meet the 2026 target of 167 credits.

The EWCA parcel BMP registration expired on 9/30/2022 and could not be counted for credit in WY2023, WY2024, or WY2025. EWCA would have provided an additional six credits. Douglas County is working with TRPA staff on an area-wide project that will allow the County to re-register this catchment once the project is completed. The EWCC parcel BMP registration expired on 9/30/2025 and could not be counted for credit in WY2025. EWCC would have provided an additional four credits. Douglas County is working with TRPA staff to get these parcel BMP certificates updated, but it is unknown exactly how long this will take as TRPA is also working on certificates for other jurisdictions. Douglas County will re-register this catchment once certificates are current. Lake Village (LV01) expired in 2022. The BMP certificates were updated in November 2022. Lake Village was re-registered in 2024 for seven credits.

Table 1: Summary of Credit Registration Accomplishments at the end of WY2025

Catchment ID	Registration Name	Pollutant Controls	Year Implemented	WY25 Estimated FSP Load Reduction	Credits
PW01	Pinewild Condominiums	Parcel BMPs	2004-2016	452	2
EWCH/BCC	KGID Road Registration (expanded to KGID area)	Road Operations	2023	4,813	24
CR02	Cave Rock WQIP	Bed Filter	2015	1,341	7
EWCC	Edgewood Creek Parcel BMPs	Parcel BMPs	2004-2016	0	0/4*
LC01	Logan Creek GID WQIP	Treatment vaults, infiltration basins	2007	478	2
LR01	Lakeridge GID WQIP	Dry basins, treatment vaults	2006	1,813	9
OP01	Oliver Park WQIP	Wet basin, treatment vaults	2006	3,623	18
LV01	Lake Village	Parcel BMPs, Infiltration Basin	2006	1,412	7
EWCA	EWCA BMPs	Parcel BMPs	2004-2018	0	0/6*
BRC	Burke Creek WQIP	Parcel BMPs	2017	914	5
DCA, 20701, 20702, 5007, 5008b	New Kahle Wet Basin	Wet basin	2018	10,151	35/51*
EDGE, EW02, SSWA2, SSWA3, SSWAE, SSWAW	Stateline Stormwater	Parcel BMPs	2024	21,315	106
Total				46,312	215/241*

*The total was reduced to 215 credits, as 16 credits were distributed to NDOT for their catchments 20701, 20702, 5007, 5008b for the New Kahle Wet Basin registration. Additionally, no credits were provided for EWCA or EWCC.

With these successful registrations, Douglas County has at least one of each BMP type. In order to maintain the credits awarded and declared in WY2025, BMP RAM was conducted on registered catchments to show that they were continuing to function. Additionally, maintenance was performed on the New Kahle Wet Basin and the Oliver Park Wet Basin. Road RAM was conducted on the KGID Road Registration.

2.1 Credit Declaration and Award

Credits are declared by January 15 and awarded by February 15 through the Lake Tahoe Info Stormwater Tools online. Credits are eligible to be declared through Treatment BMP RAM inspection results, Parcel BMP inspection results, and Road RAM inspection results. For WY2025, 215 credits were declared. The New Kahle Wet Basin has 51 credits associated with the registration, however in WY2025, 16 of those credits were distributed to NDOT, as some of their facilities drain to the wet basin.

Table 2: Jurisdiction-wide credits, declared

Water Year	2025 Annual Credit Target	2026 Five Year Milestone	Credits Expected	Credits Declared	Credits Awarded
WY2025	135	167	215	215	215

The following registrations were declared in WY2025 for road operations, water quality improvement projects, and parcel BMP implementation.

Table 3: Credit declared due to road operations, water quality improvement projects, and parcel BMP implementation

Catchment ID	Primary Water Quality Improvement Actions	Declaration Date	Lake Clarity Credits Expected	Lake Clarity Credits Declared
PW01	Parcel BMPs	1/28/2026	2	2
EWCH, BCC, EWCG, EWCE, BCB, EWCC, EWCD, EWCB	Road Operations and Maintenance	1/15/2026	24	24
CR02	Cave Rock WQIP	1/15/2026	7	7
EWCC	Parcel BMPs	Expired 9/30/2025	4	0
LC01	Logan Creek WQIP	1/15/2026	2	2
LR01	Lakeridge WQIP	1/15/2026	9	9
OP01	Oliver Park WQIP	1/15/2026	18	18
LV01	Parcel BMPs	1/15/2026	7	7
EWCA	Parcel BMPs	Expired 9/30/2022	6	0
BRC	Parcel BMPs	1/15/2026	5	5
DCA, 20701, 20702, 5007, 5008b	New Kahle Basin WQIP	1/27/2026	35/51*	35/51*
EDGE, EW02, SSWA2, SSWA3, SSWAE, SSWAW	Parcel BMPs	1/28/2026	106	106
Total			215/241*	215/231*

*The total was reduced to 215 credits, as 16 credits were distributed to NDOT for their catchments 20701, 20702, 5007, 5008b for the New Kahle Wet Basin registration. Additionally, no credits were provided for EWCA or EWCC.

2.2 BMP RAM Inspection Results

All BMP Assessments were entered into the Lake Tahoe Info (LT Info) Stormwater Tools. Table 4 below outlines the BMP RAM inspection results to demonstrate the systems are functioning and have been maintained. Maintenance was performed on the Oliver Park Wet Basin and the New Kahle Wet Basin. Please note, RAM scores are only determined for BMPs that are considered ‘essential’ and ‘key’ water quality improvements. Essential is defined as the potential to receive 10+ credits, and key is defined as the potential to receive 3-9 credits. Specific inspection results for each BMP are documented in the online Stormwater Tools Assessments page. Please note that although the Lake Village registration generates 7 credits, the infiltration basin associated with the registration produces 1 credit, therefore the infiltration basin does not require BMP RAM.

Table 4: Summary Table of BMP RAM WY2025 Inspections conducted in August and September 2025.

Catchment Name	BMP Name	Threshold	Observation	Benchmark	Annual Score
CR02 Cave Rock WQIP	DCBF0001 Bed Filter	60% decline (0.2 in/hr)	1.738 in/hr	0.5 in/hr	5.0
LR01 Lakeridge GID WQIP	DCDB0005 Dry Basin	20% decline (0.08 in/hr), vegetation cover 20%, material accumulation (depth 0.45 ft)	.526 in/hr, vegetation cover (wetland/riparian) 0%, material accumulation depth 0 ft	0.1 in/hr, vegetation cover 0%, material accumulation depth 0 ft	5.0
OP01 Oliver Park WQIP	DCWB0001 Wet Basin	vegetation cover min 45% max 75%, material accumulation (depth 1 ft)	vegetation cover 75%, material accumulation depth 0 ft	vegetation cover 60%, material accumulation depth 0 ft	3.8
New Kahle Wet Basin	New Kahle Wet Basin	vegetation cover min 45% max 75%, material accumulation (depth 1 ft)	vegetative cover 60%, material accumulation depth 0 ft	vegetative cover 60%, material accumulation depth 0 ft	5.0

The Cave Rock WQIP is functioning at a high level currently. Some preliminary maintenance was conducted by the Cave Rock GID in the summer of 2019. Douglas County staff coordinated with the Cave Rock GID to conduct the maintenance of the culvert inlet and outlets of the basin during WY2020.

The Lakeridge WQIP is functioning at an optimal level currently. Douglas County staff coordinated with the Lakeridge GID to conduct maintenance during WY2022. Maintenance was conducted in September 2022, and vegetative cover and sediment was removed from the basin and near the inlet. Access was an issue with these BMPs to perform maintenance; however, Douglas County staff overcame those obstacles. Because there is no access road, the work must be performed on a steep angle with the excavator, and the dirt needs to be handled four to five times to get it where it can be loaded in the truck. The truck must back up over the curb to get access to be loaded. In future BMP designs, maintenance access will be a major consideration.

The Oliver Park WQIP assessment was conducted based on the updated benchmark and threshold for the percentage of vegetative cover to align with the TRPA BMP Handbook. An extensive vegetation removal maintenance project occurred in WY2018. Other vegetation removal maintenance projects occurred in September 2022, September 2023, August 2024, and September 2025. These projects brought the wet basin back to functioning condition. A repair was also made to the low flow drain at the outlet of the basin, so the basin is functioning optimally now.

2.3 Parcel BMP Inspection Results

The six parcel BMP registrations are Pinewild (PW01), the lower north side of Kingsbury neighborhood (EWCC), the lower south side of Kingsbury neighborhood (EWCA), Lake Village (LV01), Burke Creek (BRC), and Stateline Stormwater (EDGE, EW02, SSWA2, SSWA3, SSWAE, SSWAW). Four of the registrations met the expected thresholds and were declared with full credit (PW01, LV01, BRC, and Stateline Stormwater). Douglas County coordinates with TRPA annually to evaluate BMP Maintenance within registered catchments to update certificates as needed. Unfortunately, EWCA expired on September 30, 2022 and EWCC expired on September 30, 2025, so these registrations are unable to be declared for credit in WY2025. An area-wide improvement project is planned for the EWCA catchment. Douglas County will also work with TRPA to bring properties within EWCA and EWCC back into compliance to achieve the expected condition percentage and will renew these registrations. If TRPA can't assist in bringing these properties back into compliance, Douglas County will update the registrations to reflect the actual percentages achieved. All the BMP Certification Percentages are available on LT Info.

2.4 Road RAM Assessments

Road RAM assessments are conducted during three time periods throughout the water year: one fall assessment October through January, if the fall one can't be accomplished, one summer assessment may be conducted (June through September), and three spring assessments February through May. In WY2025, assessments were conducted in January 2025, April 2025, May 2025, and August 2025.

This road network was registered at a score of 3.0. The road class score during WY2025 was 3.4. Douglas County was able to declare all the 24 expected credits for the expanded Kingsbury GID road registration for WY2025.

3.0 STORMWATER LOAD REDUCTION PLAN

The Interlocal Agreement between NDEP and Douglas County outlines the annual targets and 5-year milestones necessary to meet TMDL specified load reductions. The credit targets are to achieve 135 credits in WY2025 and then 167 credits in WY2026 (five-year milestone). As registrations are approved by NDEP, monitoring will occur annually and maintenance will be performed (as funding allows) when thresholds are reached as outlined in each registration memo. Sustainable funding options are being explored, refer to Fiscal Analysis section 4.0 for details.

3.1 Progress toward 2025 Milestone Target

In order to attempt to meet the 2025 milestone target of 135 credits, Douglas County maintained the existing registrations from WY2024, with the exception of the EWCA parcel BMP registration that expired September 30, 2022 and the EWCC parcel BMP registration that expired September 30, 2025. The Stateline Stormwater parcel BMP registration was also updated for additional credits. In order to continue to work towards the next interim target to

achieve the 2026 target of 167 credits, Douglas County will continue to coordinate with KGID on road operations and with TRPA for private parcel BMP compliance.

3.2 Progress toward 2026 Five-Year Milestone

Douglas County registered the number of load reduction activities necessary to exceed the cumulative target of 135 credits for the 2025 target. The County intends to continue on its course to meet the 2026 five-year milestone. When possible, the County will register more activities than necessary to ensure future five-year milestones are also met. Actions listed in Section 3.1 contribute toward meeting the 2025 interim milestone. An increase in credits doesn't occur until 2026, when the County has a five-year milestone credit target of 167. Although the County currently has registrations exceeding this target, it intends to implement an additional project that will allow an additional catchment registration prior to that date. The Pinewild/Marla Bay Water Quality Improvement Project is being coordinated with NDOT and NTCD and should be constructed in the field season of 2025. Once the project is completed, it will be registered for 13.9 credits to Douglas County and 10.1 credits to NDOT. If all current registrations are maintained, they will put the County over the required milestone for WY2026.

Douglas County expanded the KGID Road Registration to catchments with 70% connectivity and above within the KGID district boundary in WY2023. This registration was expanded all at once, rather than phased in. The County intends to work more closely with KGID to meet the expected targets for the expanded road registration.

Water year milestones are outlined in Table 5 below, taken from the Interlocal Agreement 2016-2021 and 2022-2026 between Douglas County and NDEP. While Douglas County plans to complete additional registrations, no changes are proposed at this time to the existing annual credit targets and five-year milestone schedule contained in the ILA.

Table 5: Progress toward 2026 Milestone per Interlocal Agreement

Water Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
FSP Load Reduction	10%	10%	10%	17%	17%	21%	21%	21%	27.5%	27.5%	34%
Credit Milestone Target*	41	41	41	82	82	101	101	101	135	135	167

**Credit Targets/Milestones for 2016-2018 are based on a Jurisdiction Baseline Load estimate conducted in 2013, while Credit Targets/Milestones for years 2019-2026 are based on revised Jurisdiction Baseline Load estimates produced in 2016.*

4.0 FISCAL ANALYSIS

In 2018, the Douglas County Board of County Commissioners dedicated \$1.1 million annually for Stormwater maintenance and flood management county-wide. On December 4, 2025 the Board of County Commissioners adopted a resolution officially establishing a Stormwater Enterprise Fund and moving forward with the creation of a county-wide stormwater utility. The County is currently undergoing a rate study for the stormwater utility, which will fund Stormwater maintenance and management in the future. The following table is an estimate of the costs to administer the County’s Lake Tahoe stormwater program. The budget contains estimated total and annual expenditures necessary to operate and maintain implemented and registered pollutant controls, as well as to design, construct, operate, register, inspect and maintain pollutant controls contained in the five-year SLRP. The table also identifies anticipated or targeted funding sources and/or finance mechanisms to cover the costs associated with the budget estimates.

4.1 Budget (total and annual expenditures to implement, operate, and maintain)

Table 6: Douglas County TMDL Implementation Budget

Stormwater Program Category	Annual Budget for FY2026	Funding Sources for FY19-FY26
Program Management: Crediting Program Implementation. Includes inspections (Road RAM, BMP RAM)	\$30,000.00	Douglas County General Fund for Stormwater Program Manager staff time
Nevada Tahoe Conservation District general project planning and engineering services	\$40,000.00	General Fund – Stormwater Management Program
Infrastructure Maintenance: Road Operations (Sanding/Deicing, Sweeping)	Kingsbury General Improvement District*	Kingsbury General Improvement District
Infrastructure Maintenance: Treatment BMPs	\$120,000.00	General Fund – Stormwater Management Program
Stormwater Monitoring (RSWMP, IMP)	\$46,000.00	General Fund – Stormwater Management Program
Capital (Pinewild/Marla Bay WQIP)	\$530,000.00	NDOT
Total Projected need to meet TMDL Program Requirements through FY2026	\$766,000.00	

4.2 Finance Plan (anticipated and targeted funding sources)

The funding for the Stormwater Maintenance Division has been provided out of the Douglas County General Fund and could be modified if General Fund revenues decrease or other priorities are identified. Douglas County began dedicating General Fund revenue to fund the Stormwater Program Manager position in 2015 and will continue to do so until the stormwater utility begins collecting fees. The Stormwater Enterprise Fund was created in December 2025, and the County is currently undergoing a rate study to determine equitable fees to fund the Division.

The County-wide Stormwater Utility would provide funding for infrastructure maintenance as well as grant funding match for capital projects. No issues are anticipated with the current funding for activities related to the TMDL through FY26.

A Stormwater Master Plan (SMP) was created and adopted in the Spring of 2024, which will further the mission of pursuing a sustainable funding source for stormwater management and continued implementation of the TMDL program. Specific projects identified in the SMP that relate to TMDL implementation are the Lower Kingsbury Area-Wide Project, the Marla

Bay/Zephyr Heights Water Quality Improvement Project, and identifying projects from before 2004 for retrofitting for credits.

Douglas County also utilizes the TRPA Water Quality Mitigation funds as match for capital projects (such as Burke Creek and the New Kahle Wet Basin) and infrastructure maintenance. Douglas County is always searching for grant funding opportunities, such as the Lake Tahoe Restoration Act (potentially available within the next few years), USFS SNPLMA funding, Nevada Division of State Lands funding, FEMA's Hazard Mitigation Program, and NDEP's 319(h) program.

5.0 BARRIERS

There are three potential barriers for being successful with the Lake Clarity Program as it is designed today.

1. The timing of Road RAM inspections continues to be a barrier to Douglas County meeting annual and five-year milestones. It is unknown if the change to the timing of Road RAM inspections will negatively impact the annual score, however it contributed to not meeting the milestone in WY2023. It was shown in WY2022 that the score of 3.0 or higher can be achieved, although there was below normal precipitation that year. It may prove difficult to rely on road operations as a method to meet milestones if scheduling or weather impacts the ability to conduct assessments at certain times of the year and prohibits Douglas County from declaring credits for a particular water year. Timing of the Road RAM inspections has impacted Douglas County's ability to achieve credits for the road registration in WY2023.
2. The Lake Tahoe TMDL program continues to operate under adaptive management principles. It is unknown what changes may occur to the program in the future. Any significant future changes to tools or policies could impact the County's ability to attain targets or milestones. Changes to tools and policies have the potential to require the County to invest additional resources in response to these changes.

6.0 BASELINE DISCREPANCIES

The baseline load estimate developed in the 2016 Baseline Report is refined with each credit registration. During the registration process, refinements will be made to the PLRM baseline inputs to better reflect baseline conditions. These changes affect Douglas County's total baseline load. Table 7 below tracks changes in baseline load for all approved registrations to date.

Table 7: Baseline Discrepancies for FSP

Catchment Name	2016 Baseline Report Estimated FSP load (lbs/yr)	Registration Baseline Refined FSP load (lbs/yr)	Baseline Difference (lbs/yr)
PW01	635.0	460.0	-175.0
EWCH/BCC*	9600.0	9170.0	-430.0
CR02	1661.0	1598.0	-63.0
EWCC	5542.0	6221.0	679.0
LC01	497.0	799.0	302.0
LR01	1790.0	2099.0	309.0
OP01**	3641.0	4146.4	505.4
LV01	2601.0	2601.0	0.0
EWCA	2411.0	2557.0	146.0
DCA***	3865.0	3893.0	28.0
BRC****	0.0	1335.0	1335.0
EDGE/ EW02/ SSWA2/ SSWA3/ SSWAE/ SSAW*****	24108.0	28109.9	4001.9
Total	56351.0	62989.3	6638.3

*EWCH/BCC has been expanded to the entire KGID maintenance area, and this was not reflected in its entirety in the baseline report.

**The Oliver Park (OP01) registration was revised due to the New Kahle Wet Basin project and the reconfiguration of storm drains in the area. The registration baseline was 4,849 lbs/year of FSP in 2018. When the registration was re-done in 2019, the baseline was reduced to 4,146.4 lbs of FSP/year. Therefore, the registration baseline was reduced from the 2018 baseline estimate by 702.6 lbs of FSP/year. TP and TN also were reduced.

***The DCA registration was approved for WY2018, and the DCA portion of the registration (there are NDOT catchments included in the current registration) baseline was 28 lbs higher than the 2016 baseline report. TP and TN also were higher.

****The Burke Creek (BRC) registration was approved in WY2019, and this catchment did not exist in the 2016 baseline report, so the registration baseline has been noted as the baseline difference, as was the same for TP and TN.

*****The Stateline Stormwater (EDGE/ EW02/ SSWA2/ SSWA3/ SSWAE/ SSWAW) registration was approved in WY2024 and updated in WY2025.

In prior reports, the difference between the estimated baseline load and the refined baseline load was 2,636.4lbs/year. Currently, the difference is 6,638.3lbs/year.

The updated difference between the estimated baseline load and the refined baseline load is 6,638.3. It represents only about 6.9% of the 2016 revised jurisdictional baseline load of 96,052 lbs/year. The baseline and revised baseline FSP, totals were used for the update of the ILA for FY22 through FY26. $96,052 + 6,638.3 = 102,690.3$.

Table 8: Baseline Discrepancies for TP

Catchment Name	2016 Baseline Report Estimated TP load (lbs/yr)	Registration Baseline Refined TP load (lbs/yr)	Baseline Difference (lbs/yr)
PW01	4.0	3.0	-1.0
EWCH/BCC*	53.0	3.5	-49.5
CR02	7.0	7.0	0.0
EWCC	25.0	25.2	0.2
LC01	2.0	3.0	1.0
LR01	3.0	8.0	5.0
OP01	15.0	17.6	2.6
LV01	11.0	11.2	0.2
EWCA	14.0	9.8	-4.2
DCA	16.0	30.0	14.0
BRC	0.0	5.0	5.0
EDGE/ EW02/ SSWA2/ SSWA3/ SSWAE/ SSAW	59.0	105.7	46.7
Total	209.0	229.0	20.0

**EWCH/BCC has been expanded to the entire KGID maintenance area, and this was not reflected in its entirety in the baseline report.*

The updated difference between the estimated baseline load and the refined baseline load for TP is +20 lbs/year. It represents about 4% of the 2016 revised jurisdictional baseline load of 475 lbs/year. The baseline and revised baseline TP, totals were used for the update of the ILA for FY22 through FY26. $475 + 20 = 495$.

Table 9: Baseline Discrepancies for TN

Catchment Name	2016 Baseline Report Estimated TN load (lbs/yr)	Registration Baseline Refined TN load (lbs/yr)	Baseline Difference (lbs/yr)
PW01	17.0	15.0	-2.0
EWCH/BCC*	188.0	7.0	-181.0
CR02	39.0	39.0	0.0
EWCC	100.0	86.1	-13.9
LC01	9.0	10.0	1.0
LR01	9.0	28.0	19.0
OP01	53.0	70.4	17.4
LV01	48.0	48.0	0.0
EWCA	48.0	33.6	-14.4
DCA	63.0	81.0	18.0
BRC	0.0	18.0	18.0
EDGE/ EW02/ SSWA2/ SSWA3/ SSWAE/ SSWAW	306.0	381.5	75.5
Total	880.0	817.6	-62.4

**EWCH/BCC has been expanded to the entire KGID maintenance area, and this was not reflected in its entirety in the baseline report.*

The updated difference between the estimated baseline load and the refined baseline load for TN is -62.4 lbs/year. It represents about 3% of the 2016 revised jurisdictional baseline load of 1,900 lbs/year. The baseline and revised baseline TN, totals were used for the update of the ILA for FY22 through FY26. $1,900 - 62.4 = 1,837.6$.