



Annual Lake Tahoe Stormwater Report for Water Year 2025

October 1, 2024– September 30, 2025

Washoe County

Prepared by:

Washoe County Community Services Department
Engineering & Capital Projects Division
1001 E. 9th Street
P.O. Box 11130
Reno, Nevada 89512
(775) 328-2041

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Table of Contents

Table of Contents	ii
List of Acronyms	iii
1 Background	4
2 Accomplishment Summary	4
Credit Declaration and Award	4
Progress Toward 2024 Target	5
3 Stormwater Load Reduction Plan	7
Description and Timeline of Controls to be Implemented	7
Estimated Credit Potential of Pollutant Controls	7
Progress Toward 2026 Milestone	8
4 Fiscal Analysis	12
Budget 12	
Finance Plan	13
5 Barriers	14
6 Baseline Discrepancies	16
References	17

Note: [Blue hyperlink text](#) in certain tables may be clicked to access the respective registration pages (LT Info login required).

List of Acronyms

BAT	Best Available Technology
BMP	Best Management Practices
BMP RAM	Best Management Practices Rapid Assessment Methodology
CICU	Commercial, Institutional, Communications, Utilities
EIP	Environmental Improvement Program
FSP	Fine Sediment Particles
GIS	Geographic Information System
ILA	Interlocal Agreement
IMP	Implementers Monitoring Program
LCCP	Lake Clarity Crediting Program
MFR	Multi-family residential
NDEP	Nevada Division of Environmental Protection
NTCD	Nevada Tahoe Conservation District
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
SWQIC	Storm Water Quality Improvement Committee
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 Background

The purpose of this report is to comply with the LCCP Handbook and Section IV.D of the *Interlocal Agreement to Implement the Lake Tahoe Total Maximum Daily Load (ILA)*, dated October 2021 between Washoe County and NDEP. The Lake Tahoe TMDL is a 65-year plan to return Lake Tahoe’s historic annual average deep-water clarity of 97.4 feet, and the ILA documents Washoe County’s commitment to reduce the FSP load in urban stormwater by establishing the second five-year TMDL credit milestone and intermediate annual credit targets. This report summarizes Washoe County’s load reduction activities undertaken during Water Year 2025 (October 1, 2024 through September 30, 2025) to meet the credit milestones and targets established in the ILA.

2 Accomplishment Summary

To meet the WY2025 intermediate credit target, Washoe County attained credits from thirteen existing BMP registrations and one existing Road registration. BMP and Road RAMs were completed for all registrations, resulting in the declaration and award of 453 lake clarity credits shown in Table 1.

Several committees and working groups provide input into the program decisions affecting the implementation of the Lake Tahoe TMDL. In addition to crediting activities, Washoe County participated in the following committees that provided program guidance for the Lake Tahoe TMDL: Parcel BMP Working Group; and the Stormwater Quality Improvement Committee (SWQIC), including two subcommittees—Stormwater Operations & Maintenance (O&M) and the Implementers’ Monitoring Program (IMP).

Credit Declaration and Award

As identified in the ILA with NDEP, Washoe County’s intermediate annual credit target for WY2025 is 452 credits (31% reduction in FSP). Per the 2024 Annual Report, Washoe County projected to register 471 credits to meet the credit target based on road operations, completed water quality improvement projects and parcel BMP certifications. Due to lower than anticipated parcel BMP percentages, Washoe County declared and was awarded 453 credits, exceeding the WY2025 target (see Table 1) by 1 credit. These annual targets are guidelines to show incremental progress toward achieving the five-year milestones, the next being 2026, that are referenced for compliance.

Table 1. Jurisdiction-wide Credits Projected, Declared, and Awarded

Water Year	ILA Annual Credit Target	2026 Five Year Milestone	Lake Clarity Credits Projected ^[a]	Lake Clarity Credits Declared	Lake Clarity Credits Awarded
2025 (October 2024 – Sep 2025)	452	496	471	453	453

[a] Projected credits are based on WY2024 Annual Report total credits anticipated to be registered and declared during WY2025.

Progress Toward 2025 Target

Washoe County worked diligently with NTCDC (who performed the PLRM modeling and RAMs) and NDEP to declare 453 credits for WY2025 and meet the annual credit target of 452 credits. The County maintained all fourteen of its existing registrations for full credit, although two of the existing registrations had to be updated with less potential credits due to lower-than-expected parcel BMP percentages and one registration declared only 30 of its 44 potential credits due to lower than expected parcel BMP percentages.

Road Operations Implementation Summary

Washoe County’s Road Registration- Water Year 2022-2026 includes 103 potential credits per year with a five-year credit schedule through WY2026, representing a network of 59 impervious acres of Priority 1 (road class) roadway with an Expected Condition Score of 3.4 for all roads within this class.

Washoe County completed four Road RAM inspections for WY2025, in accordance with LCCP. The inspections were conducted on October 30, 2024, and January 15, April 14, and May 1 of 2025. Washoe County’s roads crews worked to maintain optimal road conditions throughout the year and subsequently received inspection scores of 5.0 (October-December) and 3.6, 3.8 and 4.5 (January-May). The average annual Road RAM score was 4.2, easily achieving and surpassing the expected 3.4 road condition score.

Due to an NTCDC labeling error while performing Road RAM on October 30, 2024, Stormwater Tools did not recognize the label as a valid assessment and was assigning 0 credits to the registration. Since credits had already been declared, the labeling error could not be corrected, thus the County requested a system override for the full 103 potential credits with an explanation. NDEP awarded the registration its full 103 credits on March 9, 2026 (Table 2).

Table 2. Potential, Declared, and Awarded Credits from Road Operations

Road Registration Name	Primary Water Quality Improvement Actions	Declaration Date	Annual Credit Potential ^[a]	Credits Declared	Credits Awarded
Washoe County Road Registration- Water Year 2022-2026	Road Operations & Maintenance	11/7/2025	103	103	103
TOTAL			103	103	103

[a] Expected credits are based on the verified registration in LT Info Stormwater Tools.

BMP Implementation Summary

Washoe County has completed many WQIPs in the Lake Tahoe Basin since the 2004 start date for TMDL compliance; due to the high rate of parcel BMP implementation in Washoe County, both parcel and treatment BMPs are registered as pollutant controls. During WY2025, Washoe County maintained thirteen existing BMP registrations, as shown in Table 3.

During summer 2025, NTCDC performed BMP RAM for registered Key and Essential treatment BMPs to meet the annual BMP RAM requirements for registered treatment BMPs and inform Washoe County of maintenance needs. Washoe County’s road crew performed the identified maintenance, including vactoring conveyance and treatment features (basins and Jellyfish), replacing basin staff plates when

needed, and erosion stabilization caused by summer thunderstorms and winter snowmelt. The Washoe County Roads Department vector truck allowed the crews to clean all pertinent stormwater infrastructure in the Incline Village area in WY2025.

While performing routine registration evaluations for annual credit estimates, NTCD determined two existing registrations needed to be updated with reduced potential credits due to under-performing parcel BMP percentages. In May 2025, the East Incline Village Phase I Registration 1 BMP Registration was updated to 54 potential credits instead of 56. In June 2025, the East Incline Village Phase I Registration 3 BMP Registration was updated to 19 potential credits instead of 21. Despite NTCD, TRPA, and County efforts, only one of two CICU parcels were recertified in the Central Incline Village Phase I BMP Registration, and with parcel BMPs considered Essential for the registration, Stormwater Tools assigned 0 credits to the registration upon declaration. Thus, the County requested a system override to attain 30 of the potential 44 credits associated with the registration. Upon review, NDEP awarded credits as declared.

Table 3. Potential, Declared, and Awarded Credits from BMP Implementations

Registration	Primary Water Quality Improvement Actions	Declaration Date	Annual Credit Potential ^[a]	Credits Declared	Credits Awarded
Fairview/Fairway Ph III WQIP Upper Deer Creek	Stormwater Treatment BMPs, Parcel BMPs	11/7/2025	37	37	37
Fairview/Fairway Ph III WQIP Rosewood Creek	Stormwater Treatment BMPs, Parcel BMPs	10/6/2024	14	14	14
Central Incline Village Phase I WQIP	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	44	30	30
E01 Parcel BMP	Parcel BMPs	10/6/2025	3	3	3
G01 Parcel BMP	Parcel BMPs	10/6/2025	2	2	2
Diamond Peak (WC68) Parcel BMP	Parcel BMPs	10/6/2025	25	25	25
Central Incline Village Phase II BMP	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	12	12	12
Central Incline Village Phase I & East Incline Village Phase I	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	69	69	69
East Incline Village Phase I Reg 1	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	54	54	54
East Incline Village Phase I Reg 2	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	22	22	22
East Incline Village Phase I Reg 3	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	19	19	19
Sweetwater-WC60dWC31a	Parcel BMPs	10/6/2025	19	19	19
Lower Wood Creek Phase I & II WQIP	Stormwater Treatment BMPs, Parcel BMPs	10/6/2025	44	44	44
TOTAL			364	350	350

[a] Credit potential is based on verified registrations in LT Info Stormwater Tools.

3 Stormwater Load Reduction Plan

Description and Timeline of Controls to be Implemented

In accordance with the ILA, Washoe County must attain 496 credits—or 34% load reduction—to meet the 15-Year Pollutant Load Reduction Milestone in 2026 for FSP. Table 4 lists the existing WY2025 registrations that will carry forward to help Washoe County attain the WY2026 target. Table 5, Table 6, and Figure 1 show the proposed registrations and timeline for WY2026. Pollutant controls proposed for registration include all three load reduction categories: road operations, parcel BMPs, and treatment BMPs.

Estimated Credit Potential of Pollutant Controls

Estimated credit potential for existing and proposed registrations are identified in Table 4 through Table 6. Table 4 presents the active registrations for WY2026 and indicates the annual credit potential for these registrations. For WY2026, Washoe County has 364 potential credits from these existing Table 4 registrations.

Table 4. Existing Registrations – Water Year 2026 Potential Credits

Registration	Pollutant Controls	Establishment Water Year	Expiration Water Year	Annual Credit Potential ^[a]
Existing Registrations				
Fairview/Fairway Ph III WQIP Upper Deer Creek Registration	Stormwater Treatment BMPs, Parcel BMPs	2016	2026	37
Fairview/Fairway Ph III WQIP Rosewood Creek Registration	Stormwater Treatment BMPs, Parcel BMPs	2016	2030	14
Central Incline Village Phase I WQIP Registration	Stormwater Treatment BMPs, Parcel BMPs	2017	2031	44
E01 Parcel BMP Registration	Parcel BMPs	2017	2031	3
G01 Parcel BMP Registration	Parcel BMPs	2017	2031	2
Central Incline Village Ph II WQIP Registration	Stormwater Treatment BMPs, Parcel BMPs	2018	2032	12
Diamond Peak (WC68) Parcel BMP Registration	Parcel BMPs	2018	2032	25
Central Incline Village Phase II and East Incline Village Phase I BMP Registration	Stormwater Treatment BMPs, Parcel BMPs	2019	2033	69
East Incline Village Phase I Reg 1 BMP Registration	Stormwater Treatment BMPs, Parcel BMPs	2020	2034	54
East Incline Village Phase I Reg 2 BMP Registration	Stormwater Treatment BMPs, Parcel BMPs	2020	2034	22
East Incline Village Phase I Reg 3 BMP Registration	Stormwater Treatment BMPs, Parcel BMPs	2020	2034	19
Sweetwater-WC60dWC31a BMP Registration	Parcel BMPs	2023	2037	19
Lower Wood Creek Phase I & II WQIP	Stormwater Treatment BMPs, Parcel BMPs	2024	2038	44
Potential WY2026 Credits from Existing Registrations				364

[a] Potential credits are based on verified registrations in LT Info Stormwater Tools.

Table 5 presents new registrations to be submitted and approved for WY2026, and the potential credits available. Washoe County has one new registration for WY2026, which is the Washoe County Road Registration- Water Year 2026-2030 for a potential 157 credits. Washoe County expanded the registration to include roads below State Route 28, mostly outside of existing treatment BMP registrations (Figure 1). The roads within the registration must maintain a 3.4 expected condition score. Overall, this registration will perform Road RAM at 20 locations, with 14, 5 and 1 RAMs on roads with baseline condition scores of 2.0, 2.3 and 2.6 respectively. The existing 364 registered potential credits and new road registration for WY2026 exceed the water year target of 496 (see Table 5).

Table 5. Proposed Registrations - Water Year 2026 Potential Credits

Registration ^[a]	Pollutant Controls	Year Implemented	Planned Registration Timeline	Projected Credits
Proposed WY2025 Registrations				
Washoe County Road Registration- Water Year 2026-2030	Road Operations & Maintenance	2026	5	157
Projected New WY2026 Credits				157
Potential Existing WY2026 Credits (from Table 4)				364
Total Projected WY2026 Credits				521

[a] Potential credits are based on verified registrations in LT Info Stormwater Tools.

Progress Toward 2031 Milestone

Assessment and Planning

With solid registrations to attain the 2026 milestone, Washoe County is looking toward the next 5-year 2031 milestone. The County plans to continue registering pollutant controls to meet credit targets and milestones for coming years. Table 6 presents the WQIPs/Urban Catchments that Washoe County anticipates registering to achieve the 2031 credit milestone, as well as the annual intermittent targets. Washoe County anticipates registering an additional 33 credits by 2031, for a total of 554 credits to satisfy Washoe County’s 2031 milestone credit target for the five-year planning horizon. While a new 2027-2031 ILA will negotiate official credit milestones for 2031, the estimated 554 credits are from the 2022-2026 ILA.

The County's 10-year stormwater plan (LCCP Projects and Credits Plan), conducted in 2021, included an assessment of existing conditions and a long-term TMDL Compliance Plan, to assist the County in compliance with the ILA and to protect Lake Tahoe water clarity. The stormwater planning memo sought to utilize time and budgets wisely by expanding the road registration in 2026 to meet the 2026 milestone. By 2027, the Burnt Cedar/Lakeshore Blvd WQIP will be registered and by WY2028, the Upper Third and Rosewood Creeks WQIP will be registered- both for parcel and treatment BMPs. Both Projects are listed in the Lake Tahoe Info EIP Project Tracker and the Upper Third and Rosewood Creeks WQIP remains on the LTRA list for additional implementation funding.

Washoe County continues to plan for the future by having added the Incline 1 Catchment, Preston Field, and Second Creek WQIPs to the LTRA and EIP Project Tracker lists. The potential credits from at least one of these projects will be needed to meet the 2031 milestone, but none of the projects were included on Table 6 due to the timeline stopping at WY2029. By maintaining the registrations listed in Table 4 and registering the projects listed in Table 5 and Table 6, Washoe County will meet the 2026 milestone with continued progress toward the next 2031 milestone. Registrations include road operations, stormwater treatment BMPs and parcel BMPs. All proposed stormwater treatment BMP registrations reflect infrastructure installed after 2004. Washoe County continues working to identify a sustainable funding source for TMDL implementation (see Section 4.1).

In 2017, NTCDC conducted a study for Washoe County to determine the potential number of Clarity Credits that could be attained by Washoe County if there was 100% compliance by private parcels with TRPA's Parcel BMP Program. The study indicated that over 50% of the 1,043 credits estimated to be required of the County for the 65-year milestone could be achieved through parcel BMPs (NTCD, 2018). However, parcel BMP credits lose optimal value if not maintained, which reduces Washoe County's credit potential and jeopardizes intermittent targets and milestone compliance. Without resources to encourage parcel owners to maintain their parcel BMPs and agency support to assist parcel owners with parcel BMP compliance, Washoe County will resort to obtaining parcel BMP credits at a minimum to avoid losing potential credits during declarations.

Projected Lake Clarity Credits for proposed credit registrations identified in Table 6 have been compiled from the best available sources, including preliminary draft registration work using PLRM v2.1. The actual load reduction and credit potential are expected to change as each catchment is registered. The updated baseline calculations will be used as the starting point for future registrations and input parameters will be refined to reflect catchment conditions more accurately.

Update to Intermediate Credit Target Schedule

The credit target schedule in Table 6 presents the load reduction targets and milestones established in the updated 2022-2026 ILA. Washoe County is on track to meet each of these targets and milestones and does not propose any changes to the credit schedule at this time.

Table 6. Proposed Future Credit Registration Schedule

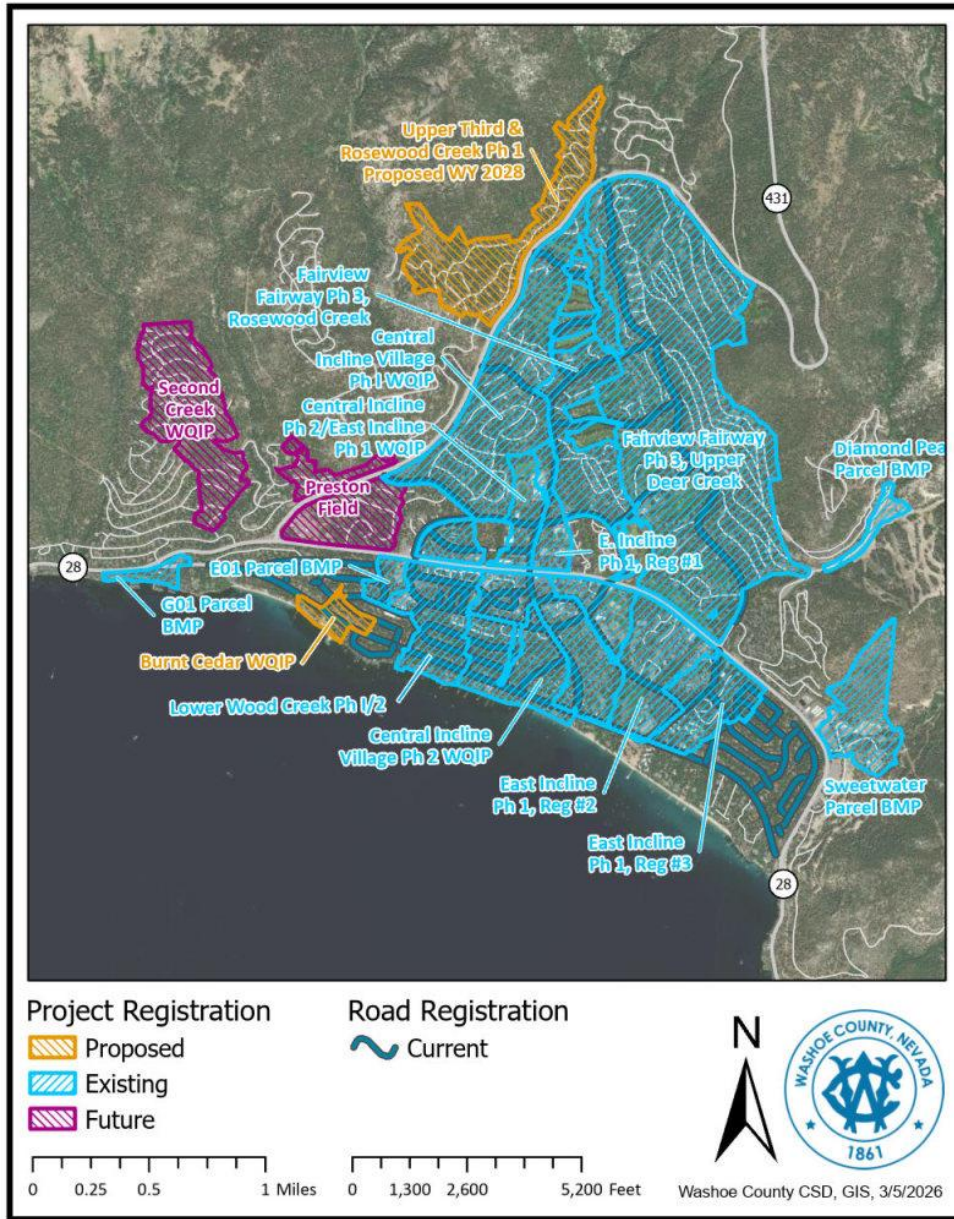
Registration ^[a]	Estimated Credit Potential by WY ^[b]				Comments
	2026	2027	2028	2029	
Fairview/Fairway Ph III WQIP - Upper Deer Creek	37	37	37	37	
Fairview/Fairway Ph III WQIP - Rosewood Creek	14	14	14	14	
Central Incline Village Ph I WQIP	44	44	44	44	
E01 Parcel BMP	3	3	3	3	
G01 Parcel BMP	2	2	2	2	
Central Incline Village Ph II WQIP	12	12	12	12	
Diamond Peak (WC68) Parcel BMP	25	25	25	25	
Central Incline Ph II/ East Incline Ph I WQIP	69	69	69	69	
East Incline Village Ph I WQIP Registration #1	54	54	54	54	
East Incline Village Ph I WQIP Registration #2	22	22	22	22	
East Incline Village Ph I WQIP Registration #3	19	19	19	19	
Sweetwater WC60d Parcel BMP	19	19	19	19	
Lower Wood Creek Ph I & II WQIP	44	44	44	44	
Road Registration – WY2026	157	157	157	157	Expanded Priority 1 Class @ 3.4 ^[d]
Upper Third & Rosewood Creeks Ph I WQIP			20	20	
Burnt Cedar/Lakeshore Blvd WQIP		7	7	7	
Total	521	528	548	548	
ILA Credit Target/Milestone ^[c]	496	497	511	526	2026 and 2031 are compliance Milestones

[a] See Figure 1 for a map of proposed registration areas.

[b] Projected credits are estimates only. Due to PLRM refinements that occur during registration, the Modeled FSP Load Reductions and Projected Lake Clarity Credits are expected to change upon registration.

[c] WY2026 is a compliance milestone year (496 credits required). Intervening annual targets are guidelines used for the purpose of demonstrating incremental progress and do not determine compliance.

[d] See Figure 1 for a map of 'Priority 1 Class at 3.4' roads included in the registration.



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Figure 1. Catchments Planned for Registration to Meet 2026 Milestone and Beyond

4 Fiscal Analysis

Budget

Expenses related to the implementation of the Lake Tahoe TMDL include program management, infrastructure maintenance, stormwater monitoring and capital improvements. Washoe County continues to analyze program cost estimates with ongoing utilization and refinement of a robust asset management system. After several unanticipated delays, the County is continuing efforts to establish the Lake Tahoe Stormwater Program Support Services Project to identify program costs and evaluate feasible long-term funding sources related to the Lake Tahoe TMDL. Project goals include identifying Washoe County's stormwater costs in the Tahoe Basin and identifying options to develop a sustainable funding source for both new infrastructure as well as the increasing maintenance and replacement of existing infrastructure along with the required staff levels to manage the program. The first project tasks include:

- Defining the Program – This includes developing the understanding of all of Washoe County's Stormwater Program requirements, components and services.
- Refining a Financial Analysis for the Program – This includes developing annual past and future program expenditures for major program elements; identifying any gaps between previous and future costs; and past revenue sources and their future availability.

These tasks will prove to be a significant undertaking, requiring compilation of a substantial amount of cost data related to all aspects of TMDL implementation. Continued data analysis will aid in determining operational and maintenance funding levels necessary for the sustainable implementation of the Program. In the meantime, the County will continue to advance the program through the following tasks:

- Continue and Refine Initial Program Branding – This includes developing Program branding and messaging, which includes defining a compelling title, tag line, and answering key questions about the Program.
- Outreach to Key Stakeholders and Potential Partners – This includes facilitating initial outreach, in the early planning and design phases, to key stakeholders and potential partners, including the facilitation and documentation of meetings with the identified stakeholders. Based on a compilation of all information, the County will determine if there is strong justification and support to move forward with a funding initiative.

In addition to continuing the cost and funding study, Washoe County will continue the use of Asset Essentials, implemented in the summer of 2018; this software utilizes GIS mapping and tracking along with operations management reporting to cross reference operations with location. Through Asset Essentials, the County can more easily track the location of areas that need increased or specific operation, as well as areas that receive redundant operation and management practices. This provides a more detailed tracking of maintenance performed related to the implementation of the Lake Tahoe TMDL. During WY2025, the County utilized GIS data, which provides Washoe County a more accurate quantification of operation performance and yields practices that better maintain assets and plan capital projects.

Finance Plan

Washoe County relies on grant funds for project planning, design, and implementation. Washoe County’s active grant funded projects (as of October 1, 2025) that support implementation of the Lake Tahoe TMDL are listed in Table 7 and include stormwater quality improvement projects, streets and roads operations & maintenance (O&M), stormwater treatment facilities O&M, participation in TMDL stormwater monitoring, and credit registration. Washoe County uses TRPA Water Quality Mitigation funds as match funding for limited infrastructure maintenance, LCCP implementation, and water quality improvement projects. However, the County recognizes these funds are not generated rapidly enough to be considered a sustainable long-term funding source and do not address the increasing operational costs nor the future repair and replacement costs. Grant administration is ongoing and includes the submittal of quarterly reports related to each project. In addition to administering the current grants, Washoe County continues to pursue available funding and explore partnerships to meet the requirements of the ILA. Washoe County will continue to target grant funding opportunities, such as the Lake Tahoe Restoration Act, Nevada Division of State Lands funding, and NDEP’s 319(h) funding program.

Table 7. Active Washoe County Projects (as of October 1, 2025)

Project Description	Funders	Total Funding Amount ^[a]	Funding Period	Water Quality Action
LCCP Registration and Implementation Ph V	NDEP 319(h) TRPA Mitigation Funds	\$14,000 \$14,000	2024-2026	Continue catchment registrations and RAMs
Upper Third and Rosewood Creeks	USFS LTRA NDSL FTPLT	\$800,000 \$742,458	2025-	Water Quality Improvement Project and Parcel BMPs
TRCD Stormwater Compliance Monitoring ^[b]	Partner Jurisdictions (7) Washoe County GF	\$354,998 \$50,714	FY 2026	TMDL required stormwater monitoring
Streets and Roads Operations & Maintenance	Washoe County Road Enterprise	\$150,000 annually	2009-2045	Operations & Maintenance
Stormwater Treatment Facilities Operations & Maintenance	Washoe County Road Enterprise	\$125,000 annually	2009-2040	Operations & Maintenance

[a] Funding amounts as of October 1, 2025

[b] Project management done by the Tahoe RCD, with Fiscal Year June 1, 2025 to June 30, 2026.

Table 8 identifies water quality projects that Washoe County intends to implement to meet credit targets and credit milestones beyond 2026. Like many of the Lake Tahoe basin jurisdictions, Washoe County does not have a reliable and sustainable funding source for the additional infrastructure maintenance and stormwater monitoring necessary under the LCCP, and while federal funds are more competitive to acquire for capital project design and construction, Washoe County continues to rely on state funding. As described in Section 4.1, the County is working to develop comprehensive program costs and ultimately identify a feasible long-term approach to fund these and other projects to meet the County’s commitments under the TMDL.

Table 8. Proposed Washoe County Projects (as of October 1, 2025)

Project Description	Targeted Funding Sources	Estimated Total Cost	Implementation Year	Water Quality Action
Upper Third & Rosewood Creeks Phase I	NDSL Tahoe Bond Act	\$6,800,000	2026	Water quality improvement project and parcel BMPs
Burnt Cedar/Lakeshore Blvd	NDEP 319(h) NDSL LTLP IVGID WC TRPA WQ Mit	\$226,971 \$121,742 \$50,000 \$50,000	2026	Water quality improvement project and parcel BMPs
Preston Field	Unknown	\$2,500,000	2028	Water quality improvement project and parcel BMPs
Incline1 Catchment	Unknown	\$2,250,000	2030	Water quality improvement project and parcel BMPs
Second Creek (B02)	Unknown	\$2,500,000	2032	Water quality improvement project and parcel BMPs

5 Barriers

Six major barriers continue to affect Washoe County’s successful implementation of the Lake Clarity Crediting Program; these include funding, decrease in prioritization of stormwater quality in the Tahoe Basin, adaptive management, Road RAM, maintaining private parcel BMP certification, and time needed to administer the LCCP.

1. Lack of a dedicated and sustainable funding source is anticipated to be Washoe County’s largest barrier to meeting the Lake Tahoe TMDL. Funding continues to be secured for capital projects, stormwater monitoring, and program management, but grant funds continue to be competitive with all jurisdictions seeking funding annually. Additionally, the County’s operations and maintenance costs continue to increase with added stormwater infrastructure and expanding road operations. As discussed above, Washoe County is actively working to address this barrier, starting with documenting total program expenses and exploring future funding options. Until a sustainable funding source is established, Washoe County will continue to rely on limited grant opportunities, diminished TRPA Mitigation funds, and partnering opportunities that result in cost savings.
2. While stormwater quality impacts remain a high priority for the Lake Tahoe basin, the identification of additional high priority issues, such as forest health, invasive species, biological diversity, climate fluctuation, and TRPA’s environmental threshold carrying capacities, have diluted federal funding allocations. These factors, combined with public observation of the amount of funding previously spent on water quality in the Tahoe Basin, lead to challenges in securing funding for stormwater-related projects and programs. Yet, significant funding is still needed to fully implement the County’s Program through the term of the Lake Tahoe TMDL. Dedicated funding is necessary at the programmatic level to ensure incremental progress will be

made and to provide better certainty of the return on capital investment through a dedicated maintenance/replacement funding stream.

3. The Lake Tahoe TMDL Program uses adaptive management to incorporate best available science and technical information; a stakeholder review process results in annual findings and possible recommended changes to the TMDL program. As a result, the Stormwater Tools and the LCCP continue to evolve since program inception. While the County has adjusted to the changes and the program and tools are more streamlined, last change was 2020, the persistent potential for change creates a challenge for the County in developing a long-term strategy to meet credit milestones to comply with the TMDL; it also makes it difficult to plan for staff time and resources to manage and administer the LCCP. Nearly all changes result in additional work on the part of the County and/or NTCD to update registrations or to otherwise comply with the adaptations.
4. Challenges associated with Road RAM inspections are a potential barrier to Washoe County meeting credit targets and milestones. Due to winter road conditions balancing weather, roadway safety, road surface conditions, scheduling, and Road RAM scores will always be a challenge, but observations of salt-clouds impacting Road RAM scores during winter months is becoming an increasing concern. While salt-cloud observations have yet to prevent Washoe County from attaining our expected road condition score, Road RAM was not designed to differentiate between dirt and salt. It may prove harmful to rely on road operations as a method to meet milestones if scheduling, weather impacts, and/or road conditions prevent Washoe County from declaring credits in any given water year.
5. Washoe County has been able to attain Lake Clarity credits from parcel BMP certification, which is substantial in Washoe County and amounts to considerable credits. However, achieving maximum credit potential requires BMPs to be maintained and recertified by TRPA, preferably annually, but at least every five years. While Washoe County and NTCD will coordinate with TRPA to maintain parcel BMP compliance TRPA's ability to keep pace with recertification is limited due to the lack of a dedicated staff member. As a result, additional time and funding must be spent updating registrations for fewer potential credits.

Parcel BMP compliance was an issue for three existing registrations in WY2025. Two registrations required funding to update for reduced credits, and the credit declaration for a third registration had to be overridden to 30 credits instead of the originally registered 44 potential credits. Updating registrations, conducting semi-annual credit target monitoring, and coordinating with TRPA on parcel BMP recertifications place a significant strain on an already limited budget. Additionally, the loss of credits means Washoe County may be less on track to meet annual interim credit targets and the 2031 Milestone than previously anticipated.

6. The entire LCCP process has become more user friendly and streamlined, and every year the registrations, assessments and declarations become more routine; however, the total amount of staff time required to administer the LCCP continues to be a challenge for Washoe County. The County has been able to meet deadlines and maintain compliance, but with additional

registrations come additional registration reviews, RAMs, tracking, planning, reporting and funding requirements. Staff time is a limited resource at Washoe County, so continued efficiencies and simplifications that can be implemented to the LCCP would be beneficial.

6 Baseline Discrepancies

The baseline load estimate developed in the 2016 Jurisdictional 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 are documented in each registration memo. NTCD maintains a comprehensive baseline load tally as continual refinements are made at the jurisdictional scale. It is important to note that NDOT loads associated with certain Washoe County registrations have been removed from Washoe County’s baseline load for WY2025. According to NTCD records, reflecting all registrations through WY2025, Washoe County’s total baseline load increased by 5 credits from the 2016 baseline report and 2.5 credits from WY2024. The changes from WY2024 to WY2025 are due to NTCD incorrectly calculating the NDOT loads associated with the Lower Wood Creek Phase I and II WQIP BMP Registration. Table 9 represents the overall baseline load adjustments from 2016 to the current Water Year, with values from the previous Water Year added to reflect annual changes.

Table 9. Baseline Discrepancies

Pollutant of Concern	2016 Jurisdictional Baseline Report Estimated	WY24 Registration Baseline Refined	WY25 Registration Baseline Refined	WY25 Baseline Difference	WY25 Baseline Difference (Credits)	WY25 Baseline Relative Percent Difference
FSP (lb/yr)	290,412	290,962	291,439	+1,027	+5	0.4%
Total Phosphorus (lb/yr)	1,228	1,216	1,218	-10		-0.8%
Total Nitrogen (lb/yr)	4,722	4,641	4,650	-72		-1.5%

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