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Executive Summary

This Pollutant Load Reduction Plan (PLRP) outlines how the County of El Dorado (County) intends to meet the third five-year National Pollutant Discharge Elimination System (NPDES) Permit (Permit) requirements for reducing pollutant loading to Lake Tahoe. The current Permit R6T-2022-0046 requires the County to develop a preliminary PLRP by September 15, 2023 to outline its strategy to reduce its baseline fine sediment particle (FSP) pollutant load by 34%, its baseline total phosphorus (TP) pollutant load by 21% and its baseline total nitrogen (TN) pollutant load by 19% by September 30, 2026. Based upon the County's Baseline Pollutant Load Calculationsⁱ, and the above-mentioned Permit requirements, the County is required to obtain 556 lake clarity credits by September 30, 2026. A credit is defined as 200 pounds of fine sediment particles less than 16 micrometers (µm) in diameter. Table IV.B.2 of the permit shows the interim permit credit target to have 449 credits by September 30, 2024. The County currently has 403 credits awarded from existing registered catchments and anticipates being awarded another 76 credits from the Country Club Heights (CCH) project totaling 479 credits to meet the interim target. Additionally, the County intends to complete a single road registration on Pioneer Trail (88 credits) in order to meet the 556 credit requirement for TMDL compliance in 2026.

Table 10-1. Fine Sediment Particle Load Allocations by Pollutant Source Category.

	Baseline	Load				Milestone Load Reductions									
	Basin-Wide Load (Particles/yr)	% of Basin- Wide Load	5 yrs	10 yrs	15 yrs	20 yrs	25 yrs	30 yrs	35 yrs	40 yrs	45 yrs	50 yrs	55 yrs	60 yrs	65 yrs
Forest Upland	4.1E+19	9%	6%	9%	12%	12%	13%	14%	15%	16%	17%	18%	19%	20%	20%
Urban Upland	3.5E+20	72%	10%	21%	34%	38%	41%	45%	48%	52%	55%	59%	62%	66%	71%
Atmosphere	7.5E+19	16%	8%	15%	30%	32%	35%	37%	40%	42%	45%	47%	50%	52%	55%
Stream Channel	1.7E+19	3%	13%	26%	53%	56%	60%	63%	67%	70%	74%	77%	81%	85%	89%
Basin Wide Total	4.8E+20	100%	10%	19%	32%	35%	38%	42%	44%	47%	51%	55%	58%	61%	65%

Table 10-2, Total Nitrogen Load Allocations by Pollutant Source Category.

Nitrogen	Baseline	Load	Milestone Load Reductions												Standard Attainment
	Basin-Wide Nitrogen Load (MT/yr)	% of Basin- Wide Load	5 yrs	10 yrs	15 yrs	20 yrs	25 yrs	30 yrs	35 yrs	40 yrs	45 yrs	50 yrs	55 yrs	60 yrs	65 yrs
Forest Upland	62	18%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Urban Upland	63	18%	8%	14%	19%	22%	25%	28%	31%	34%	37%	40%	43%	46%	50%
Atmosphere	218	63%	0%	0%	1%	1%	1%	1%	1%	1%	1%	1%	2%	2%	2%
Stream Channel	2	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Basin Wide Total	345	100%	2%	3%	4%	5%	6%	6%	7%	7%	8%	8%	9%	9%	10%

Table 10-3. Total Phosphorus Load Allocations by Pollutant Source Category.

Phosphorus	Baseline	Load	Milestone Load Reductions												Standard Attainment
	Basin-Wide Phosphorus Load (MT/yr)	% of Basin- Wide Load	5 yrs	10 yrs	15 yrs	20 yrs	25 yrs	30 yrs	35 yrs	40 yrs	45 yrs	50 yrs	55 yrs	60 yrs	65 yrs
Forest Upland	12	32%	1%	1%	1%	2%	1%	1%	2%	2%	2%	2%	2%	3%	3%
Urban Upland	18	47%	7%	14%	21%	23%	26%	28%	31%	33%	36%	38%	41%	44%	46%
Atmosphere	7	18%	9%	17%	33%	36%	39%	42%	45%	48%	51%	53%	56%	58%	61%
Stream Channel	1	3%	8%	15%	30%	32%	34%	36%	38%	40%	42%	44%	46%	48%	51%
Basin Wide Total	38	100%	5%	10%	17%	19%	22%	24%	26%	28%	30%	32%	33%	34%	35%

To meet programmatic requirements in what was an evolving program in the first Permit term; in 2017 the County registered three catchments which included the Montgomery Estates, Apalachee and Tahoe Hills / Rubicon projects. By registering these three projects, the County complied with TMDL requirements by obtaining 164 lake clarity

credits (10% FSP reduction) as calculated in the revised Baseline Load Analysis completed in 2016ⁱⁱ.

The County then registered the Meyers Stream Environment Zone / Erosion Control Project (SEZ / ECP), which encompasses the majority of the Meyers area, and includes the largest pollutant-contributing watershed in the Tahoe Basin portion of El Dorado County. The project contains a very large wetland restoration component and nine large infiltration basins. Two new outfalls were created that hydrologically disconnected these watersheds, dispersing water into several large treatment systems. This project was successfully registered in 2018 and was awarded 239 credits totaling 403 secured credits to meet the 342 credit target for 2021. As of the date of this report, the County is currently in compliance with all conditions as required in the current Permit.

1.0 Background

1.1 Lake Tahoe Total Maximum Daily Load (TMDL)

Lake Tahoe is a national treasure and was designated by the Environmental Protection Agency (EPA) as an Outstanding National Resource Water (ONRW). In order to establish long term water clarity trends and to monitor Lake Tahoe's health, Lake Tahoe clarity measurements have been taken consistently since 1968. The long-term trend had shown a historically declining condition, but the trend has exhibited moderate improvement, particularly over the last decade (2002 – 2011)ⁱⁱⁱ. In order to continue to improve this trend, a TMDL was developed for Lake Tahoe. The TMDL process identifies the maximum load of a particular pollutant that a water body is able to assimilate while fully supporting its designated uses. The Lake Tahoe TMDL has an endpoint target of the mean annual water clarity of 97.4 feet, which was the measured clarity during the period from 1967 to 1971.

In 2011, the Lahontan Regional Water Quality Control Board (Lahontan) completed a TMDL analysis for Lake Tahoe and determined that an increased emphasis should be placed on controlling very fine sediment particles, which are less than 16 micrometers in diameter, from the urban areas surrounding Lake Tahoeiv. As a result, Lahontan adopted Basin Plan Amendments (BPA) to modify their water quality protection mandates to focus local Basin jurisdictions' efforts toward controlling fine sediment loading. Along with the BPA, an updated NPDES Permit was adopted, requiring the local jurisdictions to participate in the Lake Clarity Crediting Program (LCCP). The LCCP is an administrative process to plan for, track, monitor and report on pollutants of concern.

1.2 Baseline Pollutant Load

In 2009, the Lahontan Regional Water Quality Control Board (Lahontan) and Nevada Division of Environmental Protection (NDEP) completed a Total Maximum Daily Load (TMDL) analysis for Lake Tahoe^v. The analysis determined fine sediment particles (FSP), defined as particles less than 16 micrometers in diameter, generated from the urban areas surrounding Lake Tahoe were the primary pollutant affecting Lake Tahoe's clarity. As a result, Lahontan completed a Basin Plan Amendment and adopted an updated Municipal National Pollutant Discharge Elimination System (NPDES) permit. Local California jurisdictions are responsible for meeting the FSP pollutant load reduction targets defined by the NPDES permit and focusing water quality improvement efforts toward preventing FSP from entering Lake Tahoe.

In March 2011, Lahontan issued a 13267 Order requiring local California jurisdictions to complete a Baseline Pollutant Load Estimate Report (Report) to include the calculation of annual pollutant loading estimates for pollutants of concern—fine sediment particles (FSP), total nitrogen (TN), and total phosphorus (TP)—under baseline (pre-2004) conditions. The County estimated these annual baseline loads by modeling catchments using the first version of the PLRM software. The County Report^{vi} contained the PLRMv1 model baseline pollutant load estimation results and acted as the benchmark for meeting Lake Tahoe TMDL compliance requirements in the first NPDES permit term (2011-2016). However, the 2011 baseline load estimate was considered outdated by Lahontan and the County due to updates to the PLRMv1 software (version 2 was adopted by Lahontan in August 2015), incorporation of a new catchment connectivity estimation methodology, and inclusion of refined model input data (e.g., updated land use and road condition scores).

In 2016, the County utilized the second version of the PLRM (PLRMv2.1) to complete an updated baseline load estimate for FSP, TN, and TP. The modeling results from this analysis became the new benchmark for meeting Lake Tahoe TMDL compliance requirements.

2.0 Methodologies

2.1 Methods of Analysis

The County utilized the PLRM to calculate pollutant load reduction estimates for fine sediment, total nitrogen and total phosphorus from the County's jurisdiction in the Tahoe Basin. County staff modeled Catchments where water quality and erosion control improvements were constructed post 2004.

Existing physical condition data were gathered and analyzed to inform the PLRM to predict the most accurate pollutant loading estimates possible. The data included area, land use, precipitation, soils, slope, road risk, road shoulder condition, directly connected impervious area, indirectly connected impervious area, treatment BMPs, road condition and private property BMPs. The County chooses not to take credit for private property BMPs with all registrations.

2.2 Model Parameters and Assumptions

See Attached Catchment Registration Memos (Appendix A). Registration memos are not included for the Country Club Heights project or the Pioneer Trail Road Registration as these documents are forthcoming in order to meet future compliance.

3.0 County Pollutant Load Reduction Plan

Section IV.C. of the NPDES Permit requires Permittees to develop a PLRP that includes the following elements: 1) Catchment Registration Schedule, 2) Proposed Pollutant Control Measures, 3) Pollutant Load Reduction Estimates, and 4) Annual Adaptive Management. These required elements, which outline how and when the County will register its UPCs to demonstrate sufficient credit by the end of the Permit term, are described in more detail below.

3.1 Catchment Registration Schedule

According to Municipal NPDES Permit Board Order R6T-2017 (previous Permit), Table IV.B.2, the County was required to achieve 342 Lake Clarity Credits by September 30, 2020. In order to demonstrate compliance with this requirement, the County has successfully registered 403 credits under the TMDL LCCP located on the Lake Tahoe Info Website https://stormwater.laketahoeinfo.org/Jurisdiction/Detail/1.

In order to meet requirements for the existing Permit term, the County intends to complete one BMP registration (CCH) and one road registration (Pioneer Trail). Table 1 outlines the catchments and credits to be attained.

Table 1 – County Catchments to be registered in the Lake Clarity Crediting Program

Project Area	Credits (rounded)	Registration Date (WY)
Apalachee (All Phases)	75	2016
Montgomery Estates (All Phases)	77	2016
Rubicon / Tahoe Hills	12	2016
Meyers SEZ / ECP	239	2018
Country Club Heights	76	2024
Pioneer Trail Road Registration	88	2026
Total Project Credits	567	
Credits Required	556	
% Attainment	102%	

3.2 Proposed Pollutant Control Measures

The PLRM gives the greatest credit for projects that focus on infiltration and wetland treatment. Since most County projects primarily focus on these processes, sufficient credits exist from the water quality and erosion control projects constructed between 2004 and 2022 to meet the first 10-year Permit pollutant load reduction requirements. In order to meet the existing 5-year permit term the County intends to register one (1) BMP project and one (1) Road Registration. The Road registration includes using source control via new sand spreading trucks and new Tymco 500x sweeper technology. This will greatly reduce road available sediment and conveyance of fine sediment particles. Recently collected Road Rapid Assessment Methodology (Road RAM) measurements conducted by the County indicate that this metric can be achieved and that load reductions can be realized. The BMP project anticipated to be registered is the Country Club Heights (CCH) Project that includes hydrologic disconnection, controlled conveyance as well as the creation of many sediment basins and constructed wetland inundation areas.

Existing Water Quality Improvement Projects

The County has been constructing projects that focus on infiltrating runoff and treating stormwater in wetlands from County roads and rights-of-way since 1982. The total volume reduction from the infiltration-based improvements has been quantified and modeled to understand the average annual pollutant load reduction that is achievable from these types of BMPs. For TMDL compliance, all improvements constructed after 2004 are available for credit since that was established as the baseline target. The BMPs constructed and modeled in the PLRM include:

- Infiltration Basins
- Wet Basins
- Bed Filter

Pollutant Load Reduction Measures

Table 2 outlines the pollutant load reduction measures that were modeled for each of the six UPCs using the PLRM. By modeling the pollutant load reduction measures for each UPC, the County has determined that 556 credits are achievable using the control measures from the following projects (Table 2).

Table 2 – Pollutant Control Measures

Project Area	Credits	Proposed Pollutant Control Measures
Montgomery		Infiltration Basins, Bed Filter, Volume Reduction,
Estates	77	Treatment
		Wet Basins, Infiltration Basin, Volume Reduction,
Apalachee	75	Treatment
Rubicon / Tahoe		
Hills	12	Infiltration Basins, Volume Reduction, Treatment
		Wet Basins, Infiltration Basins, Volume Reduction,
Meyers	239	Treatment
Country Club		Wet Basins, Infiltration Basins, Volume Reduction,
Heights	76	Treatment
Pioneer Trail		Source Control, Road Sweeping. Advanced Abrasive
Road Registration	88	Technology, Advanced Abrasive Spreading Systems

3.3 Pollutant Load Reduction Estimates

The estimates for pollutant loading and pollutant load reduction were completed using the methodologies described above in Section 2. The County's Expected Pollutant Load Estimate, after registering the six catchments, is outlined below in Table 3. The County can obtain sufficient credit to meet the pollutant load reduction requirements of the Permit by registering catchments where erosion control projects were constructed between 2004 (baseline condition) and 2021 and where road conditions can be improved on Pioneer Trail. See Appendix A for the results summary and registration memos.

Table 3 – Baseline Loading & Expected Condition Loading Estimates

	Ехр	ected Condition	Loadir	na Estii	nates		
		Apalachee PLF					
					FSP		FSP
	Volume	FSP	TP	TN	Reduced	Credits	Reduced
Scenario	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(#)	(%)
Baseline	29.8	23,727	78	258	NA	NA	NA
PostProject	23.7	6,949	28	118	16,778	84	71
		Montgomery Estate	sc DI RM	Scanari	OS		
		Workgomery Estate	23 I LIVIVI	Jeenan	FSP		FSP
	Volume	FSP	TP	TN	Reduced	Credits	Reduced
Scenario	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(#)	(%)
Baseline	51.6	30,356	115	428	NA	NA	NA
PostProject	31.9	16,729	66	252	13,627	68	45
1 OSTI TOJCOT	01.0	10,720	- 00	202	10,021	00	10
		Rubicon / Tahoe Hil	IS PLRM	Scenari			
					FSP		FSP
	Volume	FSP	TP	TN	Reduced	Credits	Reduced
Scenario	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(#)	(%)
Baseline	10.9	4,776	21	76	NA	NA	NA
PostProject	6.6	2,393	12	44	2,383	12	50
		Meyers ECP / SEZ	PLRM S	cenarios	3		
		, ,			FSP		FSP
	Volume	FSP	TP	TN	Reduced	Credits	Reduced
Scenario	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(#)	(%)
Baseline	170.7	66,711	249	883	NA	NA	ŇÁ
PostProject	118.3	18,867	78	318	47,845	239	56
		Country Club Heigh	ts PI RM	Scenari	ns		
		country class ricigii	CS I LIW		FSP		FSP
	Volume	FSP	TP	TN	Reduced	Credits	Reduced
Scenario	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(#)	(%)
Baseline	46.8	23,380	96	370	NA NA	NA	NÁ
PostProject	42	8,150	39	190	15,230	76	65%
		Pioneer Road Reg	PLRM S	cenario			
					FSP		FSP
	Volume	FSP	TP	TN	Reduced	Credits	Reduced
Scenario	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(#)	(%)
Baseline	39.9	30,329	88	278	NA	NA	NA
PostProject	39.9	12,760	50	219	17569	88	58%
•				•			•
					FCD		
			TP	TN	FSP Reduced	Credits	
Summary			(lbs/yr)		(lbs/yr)		
Summary Load Reduction			373	(lbs/yr) 1152	113,432	(#) 567	
Requirement			246	792	111,167	556	
% Attainment			152%	145%		102%	
/o Allamment			102%	145%	102%	102%	

Pioneer Trail Road Registration Summary

	Pioneer PLRM Outfalls											
0.16.11	Connectivity	Connectivity Baseline Post Project Baseline Post Project FSP Reduced Credits		Credits	FSP Reduced	Baseline	Post Project	Baseline	Post Project			
Outfall		Volume	Volume	FSP	FSP	(lbs/year)	(#)	(%)	TP	TP	TN	TN
		(ac-ft/yr)	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(IDS/year)	(#)	(%)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)
35	100%	NA	NA	2039	621	1418	7	70%	6	3	17	13
36	100%	NA	NA	1637	704	933	5	57%	5	3	16	13
40	100%	NA	NA	2203	750	1453	7	66%	6	3	20	15
44	100%	NA	NA	3971	1767	2204	11	56%	12	7	41	33
48	100%	NA	NA	2342	984	1358	7	58%	7	4	21	17
53	100%	NA	NA	3835	2046	1789	9	47%	10	6	29	22
54	30%	NA	NA	6473	2861	3612	5	56%	17	10	51	39
64	30%	NA	NA	6758	2817	3941	6	58%	20	12	66	52
65	30%	NA	NA	744	270	474	1	64%	2	1	6	5
75	30%	NA	NA	3516	1386	2130	3	61%	10	6	33	25
60	90%	NA	NA	207	109	98	0	47%	1	0	1	1
70	70%	NA	NA	12669	5128	7541	26	60%	37	22	123	98
							88					

Country Club Heights BMP Registration Summary

	Country Club Heights PLRM Outfalls											
Outfall	Baseline	Post Project	Baseline	Post Project	FSP Reduced	Credits	FSP Reduced	Baseline	Post Project	Baseline	Post Project	
Outfall	Volume	Volume	FSP	FSP	(lbs/yer)	(#)	(%)	TP	TP	TN	TN	
	(ac-ft/yr)	(ac-ft/yr)	(lbs/yr)	(lbs/yr)	(IDS/ yel)	(#)	(%)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	
Outfall1	46.8	42.0	23,380	8,150	15,230	76	65	96	39	370	190	

3.4 Annual Adaptive Management

Throughout the NPDES Permit cycles, the County will continue to refine its understanding and operation of the required LCCP processes to improve efficiency and ultimately, protect water quality. The County's Storm Water staff will work with the appropriate staff from both the Engineering Division and the Maintenance Division to annually assess storm water management activities and the associated load reduction progress. Since most of the County's credits are coming from improvements that are already constructed, the County's primary responsibility will be to inspect BMPs to ensure that they are adequately maintained and are functioning as designed.

The County is well versed in the use of the TMDL tools and has been involved in the development of these tools for many years. The County has also been successful in the development and implementation of a new electronic inspection, prioritization and maintenance program. An ArcGIS system utilizing a "Field Maps" app is used to annually inspect all assets and prioritize them for maintenance. County Maintenance and vactor crew staff use this electronic system to track and log maintenance intervals and assist with asset management and long-term maintenance needs. This will help to not only prioritize and maintain pollutant control measures but also the assets (i.e. drop inlets, sediment traps, conveyances) that distribute stormwater to those pollutant control measures. The inspection and tracking system will inform asset managers of maintenance needs effectively and efficiently. Maintenance of these assets will ensure pollutant removal capabilities and long-term functionality.

The Permit includes a Monitoring and Reporting Program that requires the Local Jurisdictions to conduct annual monitoring including catchment scale and BMP effectiveness monitoring. It is anticipated that this information will allow the County to

adaptively manage the TMDL and Permit requirements to better understand BMP effectiveness and the PLRM.

The County will also continue to improve its understanding of water quality improvement practices including water quality project construction, BMP and roadway maintenance activities and measures. These measures will continue to be the County's key components to achieving Lake Tahoe's clarity goals and the County intends to take credit for these actions throughout the TMDL process.

4.0 Following NPDES Permit Terms

The County will continue to focus its efforts on improving water quality and reducing pollutant loading to Lake Tahoe. As stated above, the County intends to focus on water quality improvement project implementation and road maintenance operations in order to meet the requirements of future NPDES Permits. Table 4 below outlines the pollutant load reduction milestones that the County is required to meet for this permit term (15-year milestone), and beyond.

Table 4 – Pollutant Load Reduction Milestones

Pollutant	5-Year Milestone	10-Year Milestone	15-year Milestone (Clarity Challenge)	Transparency Standard (65-Year)
FSP	10%	21%	34%	71%
TP	7%	14%	21%	50%
TN	8%	14%	19%	46%

4.1 Operations & Maintenance

BMP Maintenance

All County BMPs are inspected annually and are maintained on a schedule to ensure functionality. To demonstrate that all of the credits should be awarded in the catchments, the County will use the BMP Rapid Assessment Methodology (BMP RAM) and Road Rapid Assessment Methodology (Road RAM) as required. All BMPs will continue to be maintained as needed to meet compliance with the registered Catchment Credit Schedules and will be annually evaluated to ensure that credits are awarded. As discussed above, the County will also continue to refine its development of the Field Maps app for strategic maintenance of all structures and assets that lead to pollutant control measures.

Sweeping and Road Operations

The County is already implementing an improved sweeping and advanced abrasive program, which is having a significant benefit on water quality and lake clarity.

To date, the County has successfully worked with the California jurisdictions on these practices (sweeping and abrasives) and is an advisor in the development of responsible abrasive applications basin-wide. Currently, the County is working with Texas Southern

University and the Tahoe Resource Conservation District (TRCD) to understand the relationship between Pavement Condition Index (PCI) and water quality. The County is committed to improving its sweeping and abrasives strategies and determining water quality benefits associated with those strategies. The sweeping and abrasives strategies will enable the County to take credit from these enhanced practices under future NPDES Permits. The County intends to take credit for road conditions during this Permit term and will verify through Road RAM assessments that expected conditions are observed with associated measurements.

5.0 Closing

The County has worked diligently through the years to help develop the TMDL policy and fully intends to continue to meet TMDL compliance targets. The County has successfully completed many water quality projects that have significantly improved surface water quality, as required under the TMDL. We are very proud of our accomplishments in attaining these high standards. Maintaining and verifying maintenance conditions of existing infrastructure will continue to be a challenge the County faces as we move forward. Future collaboration and targeted strategic maintenance will ensure all structures are maintained as required.

Future project implementation is dependent on several factors including funding availability, planning and engineering resources, maintenance participation and coordination with agency partners. Tahoe has been very fortunate to have support from State and Federal partners in this incredibly collaborative process and we look forward to continuing to deliver the high level of excellence required in order to protect Lake Tahoe, one of the most revered and pristine water resources in our nation.

6.0 References

¹ County of El Dorado. 2016. Baseline Pollutant Load Update.

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