



# UNRBA PFC Meeting

## July 1, 2025

### 9:30 AM to 10:30 AM

**Remote Only**

(see agenda for remote access instructions)



# Agenda

- Opening comments, agenda review/revisions
- Status and timeline for Falls rules readoption
- Extension of IAIA Program and Annual Reports Due Soon
- Communications
- Other Items
- Closing comments

# **Opening Comments, Agenda Review/Revisions**

# **Status and Timeline for Falls Rules Readoption**

# Status of UNRBA Rules Development Process

- The UNRBA hosted 18 workgroup meetings and two workgroup workshops between December 2024 and April 2025.
- Four very preliminary draft rule sections were distributed to the PFC and other interested stakeholders
  - Distributed before the May 6, 2025, PFC [meeting](#)
  - Comments and suggestions from participants were compiled and discussed during the June 3, 2025 [meeting](#)
- DWR discussed that they had not been participating in the UNRBA meetings while they were drafting their own rules
- Forrest again requested that DWR wait until the UNRBA process is complete to take our well-vetted drafts and make the adjustments needed, pointing out differences between UNRBA and DWR proposals
- The Board reiterated the importance of collaboration to secure revised rules during their June meeting and requested the most recent versions of the UNRBA drafts rules for their review

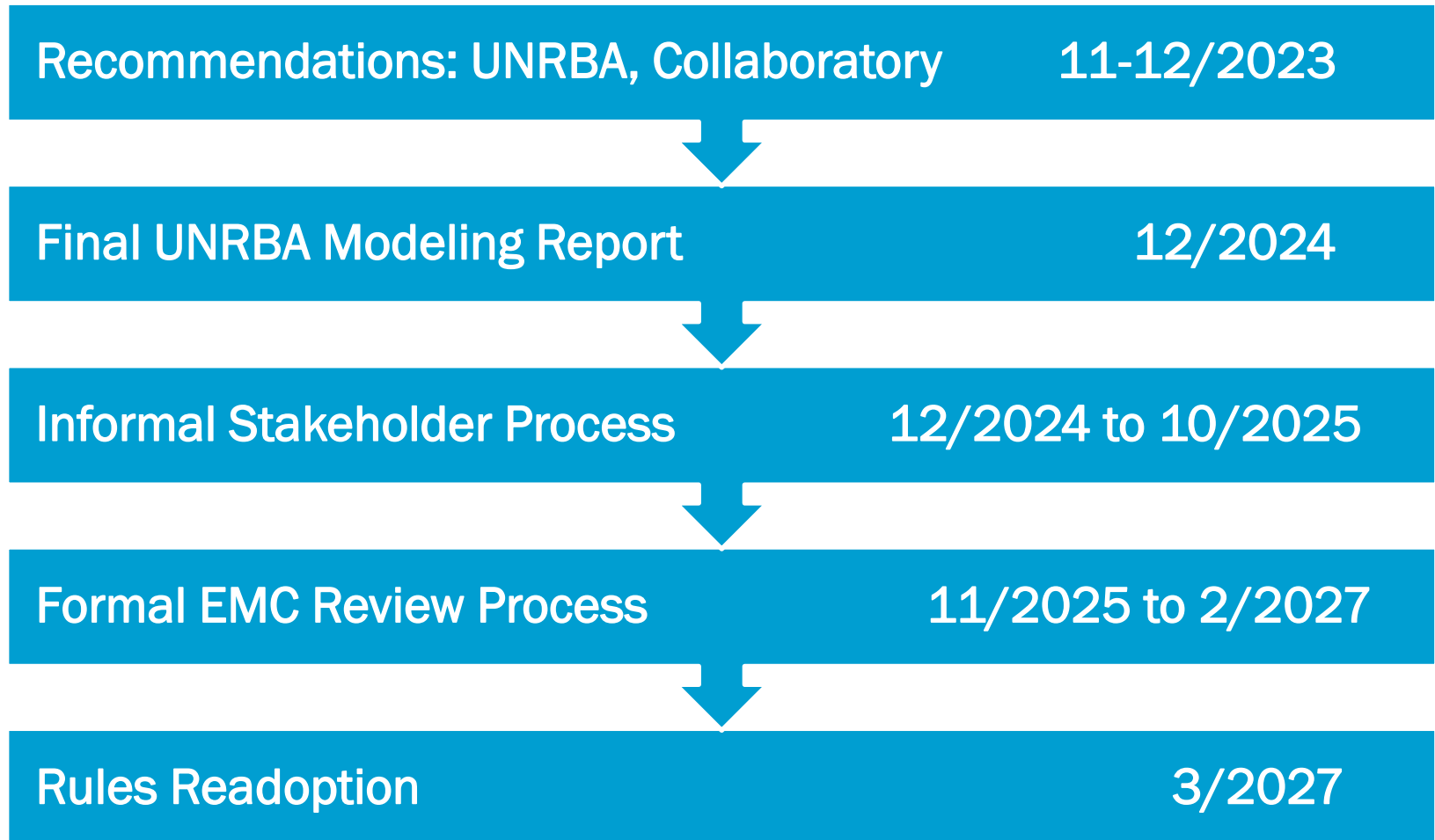
# Issues Discussed with DWR on June 20<sup>th</sup>

- UNRBA's proposed assessment methodology
  - Requires input from EPA on whether this is a site-specific criteria
  - Will work to set up a meeting with EPA to discuss
- Constraints on WWTPs under the current rules
  - DWR suggested effluent limits of 3 mg-N/L and 0.1 mg-P/L at permitted flows with a bubble permit to get through next several years
  - Modelers are evaluating these limits for potential impacts
  - Need to discuss feasibility with wastewater operators
- DWR's proposed cap on land conservation
  - Discussion continues; DWR generally does not understand our concern with capping this practice; [input from local governments on how a cap would have affected implementation of projects would be helpful](#)
- Baseline period for the rules
  - DWR is considering changing the baseline to 2015 to 2018 with nutrient load reductions relative to those years
  - This issue is fundamental to whether or not we can issue joint rules
- New development rules
  - Discussed need for collaborative response to HB926
  - Other elements of new development rule were not discussed due to time constraints; unclear what DWR may be proposing for Falls

# Next Steps for Rules Review

- DWR hosted an all stakeholders meeting for the Falls Rules on June 24<sup>th</sup>
- Following the June 20<sup>th</sup> and 24<sup>th</sup> meetings, and pending preliminary input from the Board, the UNRBA draft rules will be revised and redistributed to the PFC and stakeholders ahead of the August PFC meeting.
- Our goal is to distribute updated drafts to the UNRBA Board Directors and additional stakeholders for review and discussion at the September 17, 2025, Board meeting.
- We plan to submit the draft rule package including supplemental information on the fiscal impacts to the EMC at the November 2025 meeting.
- We will continue to work toward a joint set of rules with DWR and are scheduling a meeting for mid-July

# Rules Readoption Schedule



UNRBA: Upper Neuse River Basin Association  
EMC: Environmental Management Commission



# Rule Development Process

## Draft-Draft-Draft

### Four Workgroups

- 12/24 to 4/25
  - 18 workgroup meetings
  - 2 workshops
- Discussed concepts and challenges
- Developed initial drafts

## Draft-Draft

### PFC, Board, EMC informational items, and Expanded Stakeholders

- 5/2025 to 10/2025
  - Review initial drafts
  - Compile input
  - Collect fiscal data
  - Refine drafts for recommendation (UNRBA Board approval; DWR may have their own recommendations)

## Draft → Final → Rules

### Formal Process

- 11/2025 to 2/2027
- Present to WQC
- Present to EMC
- Public comment period
- Public hearings
- Rules to RRC with fiscal analysis

EMC: Environmental Management Commission  
WQC: EMC Water Quality Committee  
RRC: Rules Review Commission

**Extension of IAIA Program and  
Annual Reports Due Soon**

# Extension of the IAIA Program

- IAIA is approved as a five-year program with an option to extend until Falls Rules are readopted.
  - The five-year period ends June 2026
  - Projected rule readoption date is in March 2027
  - IAIA program will need to be extended
- During the November 19, 2025, UNRBA Board meeting, we will include a Compliance Group Committee (CGC) meeting to consider submitting a request to the EMC to approve an extension of the IAIA program
  - Five years, or
  - Until the Falls Rules are readopted and an updated watershed protection plan is developed and approved by the Commission (i.e., an updated [Program Document](#))

# Year Four of the IAIA Ended June 30<sup>th</sup>

- The fourth-year of the Stage I Existing Development Interim Alternative Implementation Approach (IAIA) ended June 30<sup>th</sup>
- Annual reports from each participant are due to [John Huisman](#) at the Division of Water Resources (DWR) with a copy to the [Executive Director](#) and [Alix Matos](#) by September 30, 2025.
- The latest version of the template is available [here](#)
  - Save a local copy of this latest version 6.3
  - Rename with your “**JurisdictionName**” and “FY**25**” in the file name
  - Review the “Instructions” tab and “Column Explanations” tab
  - Enter FY2025 projects into the “User Input” tab
    - Blue cells are dropdown menus
    - Purple cells are automatically populated
    - Green cells are user entered values or text
    - **Carry over from the previous year must be entered manually**

# Communications

# **Additional Information and Activities**

- Recent workshop with DWR
- Status updates to the EMC – WQC July 9<sup>th</sup>
- Planning a meeting with the new Secretary of DEQ
- Planning a meeting with staff from the NC Office of State Budget Management

# Ongoing Discussions/Issues

- Ongoing NC State University UNRBA and Jordan Lake One Water research study
- Impacts on implementation of nutrient requirements in light of PFAS/PFOS and other emerging requirements on wastewater management costs to local governments. DWR developing an implementation plan for control of these pollutants—EMC to review

# Links to Reference Documents

- UNRBA [Consensus Principles II](#) to guide development of the revised Falls Lake Rules
  - Based on scientific conclusions resulting from a 10-year evaluation of Falls Lake and its watershed by the [UNRBA](#), [NC Collaboratory](#), and [other organizations](#)
  - Companion document: “[Concepts and Principles for the UNRBA Recommendations for a Revised Falls Lake Nutrient Management Strategy](#)”
    - History of Falls Reservoir and Falls Rules
    - Summary of [key findings](#) from modeling and monitoring
    - Recommendations for revised nutrient management strategy
- Additional information available online in the UNRBA Resource Library: <https://unrba.org/resource-library>.
- [Falls Lake water quality evaluation](#) conducted by Dr. Marty Lebo to support development of Falls specific assessment methodology
- [UNRBA Lake Modeling Report](#) (summarizes historic water quality monitoring data and use support information)
- Final Program Document: Stage I Existing Development Interim Alternative Implementation Approach ([IAIA](#))
- [UNRBA 2019 Annual Monitoring Report](#)



## **Closing Comments**

**Next PFC Meeting Scheduled for  
August 5, 2025, from 9:30 AM to Noon**