



# **UNRBA PFC Meeting November 4, 2025 9:30 AM to Noon**

**Butner Town Hall with  
Remote Option**  
(see agenda for remote access instructions)



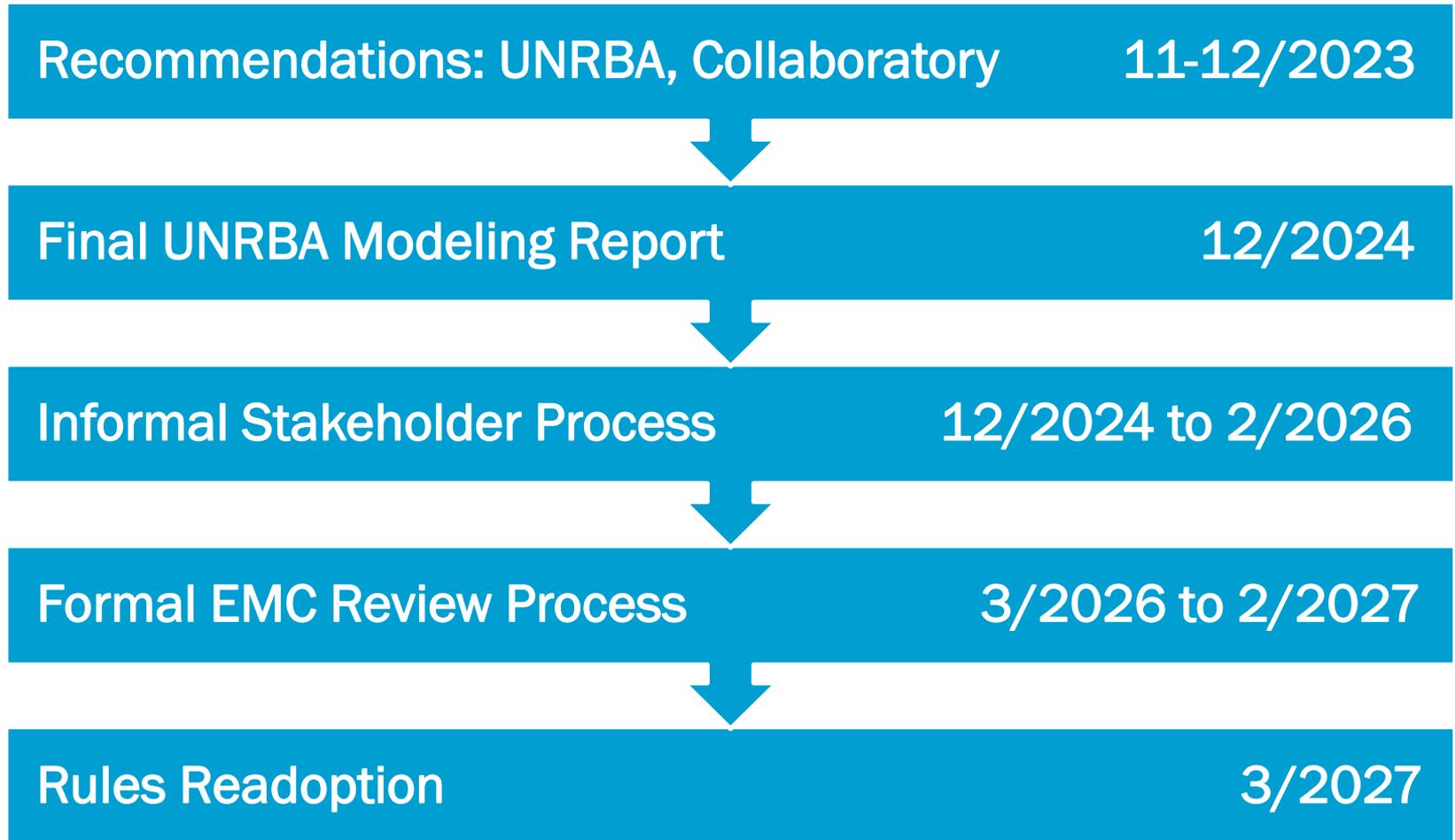
# Agenda

- Opening comments, agenda review/revisions
- Status and timeline for Falls rules readoption
- Purpose and Scope Rule
- Existing Managed Lands Rule
- New Development Rule
- Wastewater Rule
- Extension of IAIA Program and Annual Reports
- Discuss Budget for FY2027
- Planning PFC Workshop on Best Practices for Implementing Falls Rules
- Communications
- Other Items
- Closing comments

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

# **Status and Timeline for Falls Rules Re-adoption**

# Rules Readoption Schedule



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

# Status of UNRBA Rule Development

- The UNRBA is extremely grateful to the workgroup members, PFC, and stakeholders for their support developing draft rules
- Iterative versions of UNRBA drafts have been made available to DWR and stakeholders for review during this process
- DWR provided its Rule drafts to the UNRBA on August 25<sup>th</sup>
- In September, the UNRBA integrated some DWR draft rule language into its rules and the PFC reviewed
- In October, UNRBA, DWR leadership, and the EMC Chair met to discuss compromises on rule concepts
- UNRBA made edits to its rules in October to reflect these compromises and input from the PFC in October
- Updated UNRBA drafts (dated October 15<sup>th</sup>) were distributed to the Board ahead of their October 21<sup>st</sup> meeting
- A minor change to Purpose and Scope Rule has occurred since the draft were distributed to the Board

# Status of UNRBA Rule Development

- Discussions with DWR and EMC continue
  - Nutrient allocations for the wastewater treatment plants
  - Reviewing rule language to reflect the compromises established with DWR/EMC
- The UNRBA has decided not to take draft rules to the EMC in November
- Based on ongoing negotiations with DWR, the issue of EMC approval of our models arose
  - We have decided to take review of the UNRBA models to the EMC WQC as an information item in November
  - We will request approval of our models by the EMC at the WQC meeting in January

# Next Steps for Submitting a Rule Package

- UNRBA will continue to work with DWR on a joint set of rules but retains the option to submit a petition for rule making
- Whether submitting jointly or independently, the package must include a fiscal note developed by DWR
- The UNRBA has been compiling supplemental fiscal information to support this effort.
  - This document will also need to be reviewed by the PFC and the Board and then approved by the Board for submittal.
  - Developing the UNRBA's economic information is important to timely readoption of the rules.
  - Once the supporting fiscal information has gone through the UNRBA approval process, we will provide to DWR so the formal process can begin.

# Anticipated Milestones for Rules Readoption

- November 2025 – UNRBA finalize draft rule language (hopefully with DWR)
- December 2025 – PFC approve final rule language and review supplemental fiscal information
- January 2026 – UNRBA Board approves package for submission to EMC Water Quality Committee (WQC)
- March 2026 – target for submitting the rule package to the EMC WQC
- May 2026 – package to the full EMC if approved by WQC
- July 2026 – earliest potential public hearing
- March 2027 – earliest target for EMC to send package to the Rules Review Commission

# House Bill 926 - Status

**MODIFY THE FALLS RESERVOIR WATER SUPPLY NUTRIENT STRATEGY RULES TO EXEMPT NEW RESIDENTIAL DEVELOPMENT DISTURBING LESS THAN ONE ACRE:** SECTION 9.(b) Falls Lake New Development Rule. – Until the effective date of the revised permanent rule that the Commission is required to adopt pursuant to Section 9(d) of this act, the Commission shall implement the Falls Lake New Development Rule as provided in Section 9(c) of this act.

SECTION 9.(c) Implementation. – Except as required pursuant to federal law or permit, **no stormwater permit, management plan, or post-construction stormwater controls shall be required under the Falls Lake New Development Rule or local ordinances adopted thereunder for single family and duplex residential and recreational development that cumulatively disturb less than 1 acre, which is not part of a larger common plan of development.**

Notwithstanding any authority granted under the Falls Lake New Development Rule or pursuant to other statute or rule, no local government may establish requirements more restrictive than that established by this section.

SECTION 9.(d) Additional Rulemaking Authority. – **The Commission shall adopt a rule to amend the Falls Lake New Development Rule consistent with Section 9(c) of this act.**

House Bill 926 was approved by the House and by the Senate and is now law. We have revised the New Development Rule and notified our members.

**Review Draft-Draft Rules  
Addressing October 7<sup>th</sup>  
Compromises**

# Purpose and Scope Rule

# Summary of October PFC Discussion and Follow-up

- 4B framework - work toward meeting the chlorophyll-a standard
- Integrated watershed health and consideration of watershed co-benefits
- Alternative to proposing Falls-specific assessment methodology
  - Identified to as a longer-term effort to address the chlorophyll-a standard in Falls Lake
  - Include a provision in the Rules for DWR to work with stakeholders and subject matter experts to develop before the next rules readoption cycle
  - Would require strong engagement by UNRBA
- Placing monitoring requirements in the water quality protection plan (WQPP) rather than in Rule
- Addressing language regarding Water Supply Waters
- Clarifying the stability metric established by Dr. Marty Lebo for determining if Falls Reservoir is stable

# Summary of October Meeting with DWR Leadership and EMC Chair

- DWR leadership agreed that working together on a site-specific standard before the next rules readoption cycle seems appropriate; would need to identify the appropriate subject matter experts.
- Forrest mentioned Dr. Marty Lebo and Dr. Nathan Hall who served on NC Scientific Advisory Council for High Rock Lake site-specific standard development. Dr. Hall also has evaluated zooplankton and chlorophyll-a relationships, nitrogen cycling, etc., in Falls Lake. Other Collaboratory researchers have studied algal toxins, nutrient cycling, etc. that may also be considered.
- Discussed the need for monitoring at least the largest five tributaries to Falls Lake to evaluate nutrient loading and progress. Discussed funding and staffing shortfalls that constrain DWR's monitoring efforts.

# Review Major October Changes to P&S Rule

- Edited PURPOSE and Item (5) regarding integrated water resource management:  
Regulated parties shall implement the Rules to restore and maintain water quality through an **integrated water resources management approach** across the Falls watershed to align nutrient reduction efforts with other **watershed benefits such as hydrologic or ecologic function** ~~water-related objectives including water supply reliability, aquatic and terrestrial habitat protection, land use planning, flood mitigation, and long term sustainability of watershed functions and services.~~
- Edited Item (3) CRITICAL WATER SUPPLY WATERSHED DESIGNATION to clarify language for WS-V waters “**pursuant to S.L. 2012-187**”
- Edited trophic “status” to trophic “condition” to address misunderstanding around a separate trophic index metric

# Review Major October Changes to P&S Rule

- **Deleted** sections pertaining to a Falls-specific assessment methodology (numbers are from the September draft)
  - (6) MONITORING
  - (7) STATIONS INCLUDED
  - (9) METHODOLOGY TO ADDRESS OUTLIERS
  - (10)(a)(iii) statistical methods that remove the small-number-of-samples trigger for non-compliance
- **Merged** the five-year and 20-year reports (Items 12 and 13) into recurring ten-year reports

# Review Major October Changes to P&S Rule

- **Moved** some related sections to the ten-year reporting elements
  - (8) AGGREGATION OF DATA WITHIN THREE LAKE UNITS
  - (10)(a) evaluation of photic zone composites or profile measurements from the photic zone (chl-a, DO, pH)
  - (10)(a)(i) annual data distributions for all years since the dam was constructed
  - (10)(a)(ii) evaluation of stability metrics for lake units
  - (10)(a)(iv) evaluation of other designated use support information
- **Added** new Item (9) DEVELOPMENT OF A SITE-SPECIFIC FALLS RESERVOIR CHLOROPHYLL-A STANDARD to require DWR to work with Falls Lake Watershed Association, limnological subject matter experts, and other interested parties to develop a site-specific Falls Reservoir chlorophyll-a standard

# Review Major October Changes to P&S Rule

- **Added** new Item (9) DEVELOPMENT OF A SITE-SPECIFIC FALLS RESERVOIR CHLOROPHYLL-A STANDARD to consider
  - (a) impacts to chlorophyll-a concentrations in Falls Reservoir caused by the following:
    - (i) nutrient loading from tributaries, atmospheric deposition, and inlake sediments;
    - (ii) precipitation patterns;
    - (iii) irretrievable and human-induced conditions including hydrologic modification caused by the Falls Reservoir dam;
    - (iv) reservoir morphology;
    - (v) water movement and circulation;
    - (vi) hydraulic residence time;
    - (vii) water temperature;
    - (viii) algal species shifts; and
    - (ix) season;

# Review Major October Changes to P&S Rule

- **Added** new Item (9) DEVELOPMENT OF A SITE-SPECIFIC FALLS RESERVOIR CHLOROPHYLL-A STANDARD to consider
  - (b) impacts to the designated uses of Falls Reservoir including recreation, aquatic life support, and the quality and treatability of the raw water as a water supply caused by chlorophyll-a; and
  - (c) impacts of more restrictive effluent limitations or nutrient controls for existing sources established or proposed pursuant to G.S. 143-215.1 in order to achieve and maintain applicable water quality standards on the following:
    - (i) social and economic impact; and
    - (ii) benefits to the public health, safety, or welfare;

# Review Major October Changes to P&S Rule

- **Added** new Item (9) DEVELOPMENT OF A SITE-SPECIFIC FALLS RESERVOIR CHLOROPHYLL-A STANDARD to consider
  - (d) description of the relationship between **cost and feasibility of achieving more restrictive effluent limitations** or nutrient controls necessary to comply with applicable water quality standards to the benefits, including the incremental benefits to the receiving waters, to be obtained to said effluent limitations;
  - (e) a **proposed site-specific standard no less stringent than that which can be achieved by the application of the highest feasible level of treatment which will result in benefits**, including the incremental benefits to the receiving waters, having a reasonable relationship to the cost to apply such treatment, as determined by the evidence.

# Review Major October Changes to P&S Rule

- **Edited** Item (10) RULE REVISIONS

The Division, in cooperation with the Falls Lake Watershed Association and other interested parties, shall develop recommendations, if any, on rule revisions based on the information reported pursuant to Items (8) and (9).

*[this is the only change made relative to the October 15<sup>th</sup> versions of the four rules distributed to the Board]*

- **Deleted** Item (19) COORDINATION – redundant with other rule items

# Existing Managed Lands Rule

# Summary of October PFC Discussion and Follow-up

- Impacts of DWR's proposed 15% per year limit on claiming early implementation credit
  - Potentially forces more load reduction than required
    - DWR indicated that is not their intent
  - Discourages and penalizes early implementation
- Comment that local governments should only be required to reduce nutrient loading from existing development that they own due to statutory limitations on their authority.
  - UNRBA rules indicate partnerships with willing landowners to try to address this issue.
- Comment that the exclusion of agriculture as a regulated entity had been removed from the draft. **Edited** the October draft to include “**Existing development excludes Agriculture as defined in G.S. 106-581.1.**”

# Summary of October Meeting with DWR Leadership and EMC Chair

- DWR leadership proposed that land conservation projects be credited for 100 percent investment credit if the project is permanently protected and has a documented plan for the tract(s) including planned projects and activities to improve water quality.
  - The October version has been **edited**: “to receive credit pursuant to this Item, the regulated entities proposing a land conservation project shall document the planned projects or activities to be implemented within the project boundary to improve water quality”
- The EMC Chair stated he did not want the EMC to have to approve updates to the SNAP tool
  - Group discussed public release for review, a beta-testing period, workshops/trainings, and an input process prior to Director approval

# Summary of October Meeting with DWR Leadership and EMC Chair

- Group discussed the administrative burden associated with 2-yr planning projections.
- DWR leadership and the EMC Chair indicated that compliance with the reporting dates for the IAIA annual reports would be sufficient to track implementation.
- PFC Co-Chairs reiterated that compliance with annual investment levels is not possible without planning, but that site constraints, grant funding, and extreme weather events require them to be nimble when putting projects in the ground. This is consistent with recent discussions with DWR staff. Comment added to rule to reflect discussion.

# Review Major October Changes to EML Rule

- **Edited** language regarding integrated water resource management to be consistent with P&S Rule
- **Edited** language regarding approval of updates to the SNAP tool: ...
  - approved by the Director after completion of the following:
  - initial release to the public as a draft tool,
  - no less than 12 months of review and testing by the public,
  - two Division-led training workshops in the Falls watershed, and
  - a summary of comments and feedback provided to the public for consideration 30 days before Director approval of the tool.

# Review Major October Changes to EML Rule

- Similar **edits** for Division approval of revised crediting documents:
  - release of a revised draft to the public,
  - no less than six months of review by the public,
  - no less than two Division-led training workshops in the Falls watershed regarding the updates,
  - and a Division-led stakeholder comment and response process to refine the draft as needed

# **New Development Rule**

# Summary of October PFC Discussion and Follow-up

- Time constraints limited discussion on the New D Rule part of the presentation during the October 7<sup>th</sup> PFC meeting
- We requested feedback from the New D workgroup and stakeholders who had commented on the September 18<sup>th</sup> version of the Rule
- One comment requested input from DWR on implementation of the runoff volume match requirement
  - Comment added to the October draft
  - Topic will be added to the upcoming UNRBA workshop on best practices for implementing the new development rules (anticipating spring 2026)
- Another comment noted that exclusion of agriculture from the draft rule had been removed in the September version.
  - **Edited the Development Excluded section** to explicitly exclude “**agriculture as defined in G.S. 106-581.1.**”

# Summary of October Meeting with DWR Leadership and EMC Chair

- DWR leadership agreed to keep the loading target at 2.2 pounds of nitrogen per acre per year with a primary SCM if BUA was greater than 12% (as discussed in our workgroup meetings) rather than the new proposal in DWR's draft for variable onsite and overall targets using a revised SNAP tool
- They also agreed to not require us to use DWR's new SNAP tool until it was fully developed, beta tested, trainings offered, released for wide public review and other important vetting steps before it would be required.
- The EMC Chair stated he did not want the EMC to approve updates to the SNAP tool –same **edits** to EML rule as New D rule regarding
  - SNAP tool updates and approval
  - Crediting document updates and approval

# Wastewater Rule

# Summary of October PFC Discussion and Follow-up

- Challenges with current Stage I load allocations which restrict the WWTPs to much less than their permitted hydraulic capacity
- 80/90 Rule (percentages of permitted hydraulic capacity) and implications for future planning
- Summarized the September 24<sup>th</sup> meeting with DWR leadership and the EMC Chair and mentioned the upcoming meeting the afternoon of October 7<sup>th</sup>
- Noted that the outcome of the afternoon meeting would likely determine the path for rules readoption (either cooperatively with DWR or as a separate petition for rule making).

# Summary of October Meeting with DWR Leadership and EMC Chair

- At the September 24<sup>th</sup> meeting, DWR leadership had requested information on the amount of nitrogen reduction achieved since the baseline period to determine if some could be re-allocated to the WWTPs to use more of their permitted hydraulic capacity.
- The PFC Co-Chairs stated that the WWTPs were built decades prior to the 2011 Falls Rules and were still being financed.
- As a result of the 2011 rules, the three major WWTPs were upgraded to five-stage biological nutrient removal (the limits of current technology), and those upgrades are also still being financed.
- Comparing the load reduction from 2015 to 2018 assuming a hydrologic condition similar to 2005 to 2007 yields a reduction in total nitrogen load delivered to Falls Lake of almost 400,000 pounds of nitrogen per year (396,211 lb-N/yr).

# Summary of October Meeting with DWR Leadership and EMC Chair

- Additional reductions will occur over time under the readopted Falls Rules due to
  - Investments in watershed health projects
  - Continued implementation of the new development rule which was designed to incrementally reduce nitrogen load
  - Continued reductions in atmospheric deposition of nitrogen
  - Continued reductions in nitrogen releases from the sediments within Falls Lake
- Given the reduction achieved since baseline and the continued load reductions that will occur, DWR leadership indicated an increase in the WWTPs' allocations was warranted and would likely be approved by EPA. They indicated they would further review the document UNRBA provided to determine the reduction that has occurred and develop a proposal for future discussion regarding an increased allocation.
- A follow-up meeting is being scheduled.

# Nitrogen Loading Comparisons – Sources, References

- Loading sources evaluated
  - Watershed tributaries including WWTPs and atmospheric deposition to the watershed
  - Atmospheric deposition directly to Falls Lake
  - Internal loading from the lake sediments
- Information sources
  - Historic total nitrogen loading estimates in the UNRBA Lake Model Report (BC, 2024)
  - DWR's (then called DWQ) Falls Lake Model Report representing 2005 to 2007 (DWQ, 2009)
  - Summary of baseline atmospheric deposition and internal lake sediment loading by Cardno ENTRIX (2013) using DWR's 2005 to 2007 model
  - DWR's recent status report for Falls Lake (DWR, 2021)
  - Summary of loading from WWTPs from UNRBA's Watershed Model Report representing 2015 to 2018 (BC, 2023)

# Nitrogen Loading Comparisons – Hydrologic Conditions

- Estimates of loading from the baseline period are based on measured flows and concentrations.
  - Baseline period occurred within a historic drought
- Recent period of comparison either needs to have had lower than average rainfall or a means to simulate watershed loading with low rainfall conditions.
- UNRBA watershed model was developed for years with average to wet rainfall (2015 to 2018)
  - Model scenarios were conducted using lower than average rainfall to compare to baseline



Falls Lake at I-85 in November 2007. Source: Southeast Regional Climate Center

# Nitrogen Loading Comparisons – Impacts of Hydrology on Loading

- Watershed loading is highly dependent on rainfall and antecedent moisture conditions.
  - 2017 was an average rainfall year (~45 inches) and
  - 2018 was a wet year (~60 inches).
- Historic loading to Falls Lake using USGS flow records and available water quality data collected in the tributaries shows
  - 2017: 1.3 million pounds of nitrogen delivered to Falls Lake.
  - 2018: 2.4 million pounds of total nitrogen were delivered.
- The wetter hydrologic condition in 2018 resulted in
  - An increase of 1.1 million pounds of total nitrogen delivered to the lake
  - Almost a doubling of annual loading.
- Therefore, the UNRBA model for 2015 to 2018 and the dry to average rainfall scenario was used for comparison to baseline
- All other inputs were the same, including WWTPs

# Nitrogen Loading Comparisons – Baseline Loading

Source	Load (lb/yr)	Basis
Watershed	1,151,683	Gaged flow and water quality monitoring data
Atmospheric deposition	133,859	EPA CASTNET models
Lake sediments	379,000	DWR EFDC model for 2006 (estimates for 2005 and 2007 were twice as high)
<b>Total</b>	<b>1,664,542</b>	<b>Sum</b>

# Nitrogen Loading Comparisons – Recent Loading Assuming Similar Hydrologic Condition

Source	Load (lb/yr)	Basis
Watershed	1,010,364	UNRBA WARMF Watershed Model, dry to average rainfall scenario
Atmospheric deposition	67,967	EPA CASTNET models
Lake sediments	190,000	UNRBA WARMF Lake Model
<b>Total</b>	<b>1,268,331</b>	<b>Sum</b>

# Nitrogen Loading Comparisons – Change in Loading

Source	Load (lb/yr)
Watershed	-141,319
Atmospheric deposition	-65,892
Lake sediments	-189,000
<b>Total</b>	<b>-396,211</b>

# Continued Reductions due to Readopted Falls Rules

- New development rule retains the nitrogen loading target of 2.2 lb-N/acre/yr.
  - Originally set by DWR to be lower than average background to reduce nitrogen loading incrementally as development occurs.
- Continued reductions in atmospheric deposition are anticipated as green energy sources and expanded use of electric and hybrid vehicles continue.
- The existing managed lands rule requires either implementation of stormwater control measures or investment in watershed health projects to improve water quality.
- Additional investment in watershed health required under the wastewater rule (as proactive investments proposed by UNRBA's draft wastewater).
- Continued reductions in loading from lake sediments which take decades to respond to changing loading inputs

# Next Steps for the Wastewater Rule

- DWR is reviewing the reduction estimates for delivered nitrogen load and has indicated they will propose an increase in load allocation based on this information and anticipated feedback from EPA
- UNRBA to meet with DWR/EMC to discuss the proposal
- If agreement can be met, we will refine the draft rules accordingly
- If agreement is not met, we will let the PFC and the Board know and discuss the potential need for a UNRBA petition for rule making
- We will provide an update to the Board at their November 19<sup>th</sup> meeting and to the PFC at their December 2<sup>nd</sup> meeting

# Critical Responsibilities Related to Potential Agreement on the Rule Provisions Identified

- We are hopeful for a resolution to the items in the rules of great concern to the UNRBA
- It isn't over until the rules are readopted
- The upcoming work is significant and even though we are working for revised rules that are achievable and manageable, the rules are still a significant burden on the jurisdictions and people in this watershed
- The follow-up provisions in the rules for developing a standard revision and for developing new rules in 10 years must be supported and the UNRBA very engaged in the process—A lot can happen between readoption and new rules!

# **Extension of IAIA Program and Annual Reports**

# 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; however this could be revised depending on the UNRBA's strategy for moving the process forward
  - IAIA program will need to be extended to maintain compliance with the existing rule
- During the November 19, 2025, UNRBA Board meeting, we will include a Compliance Group Committee (CGC) meeting to consider an addendum to the IAIA Program Document to
  - Extend the duration (five years, or until the Falls Rules are readopted and an updated watershed protection plan is developed and approved by the Commission
  - Approve a letter to inform DWR and the EMC of the amended Bylaws and request an extension of the program
  - Authorize the Chair to sign pending approval of the amended Bylaws by the UNRBA Board

# Submission of the IAIA Summary Report

- 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 were 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 PFC will review a preliminary UNRBA Annual Summary Report during the meeting
- Following review and approval by the CGC, the UNRBA Annual Summary Report will be submitted to DWR by November 30, 2025.

# Review Preliminary FY2024-2025 IAIA Summary Report

- Implementation of the IAIA began July 1, 2021
- The fourth year ended June 30, 2025
- Each year participants submit annual reports to DWR to assess individual compliance including
  - Annual minimum investment requirement
  - Previous-year rollover amount if applicable
  - Current-year investment commitments and project info.
- Copies are provided to the UNRBA for summary reporting
- The PFC will review the preliminary summary report on the following slides

# IAIA FY2024-2025 Funds Allocated and Cumulative Rollover

Participant	Annual Minimum Requirement	FY2024-2025 Funds Allocated	Cumulative Rollover to Next FY
City of Creedmoor	\$16,926	\$ 16,926	\$ -
City of Durham	\$337,587	\$ 913,833	\$ 3,645,595
City of Raleigh	\$466,081	\$ 506,000	\$ 2,326,561
Durham County	\$133,300	\$ 310,896	\$ 800,485
Franklin County	\$19,058	\$ \$19,058	\$ -
Granville County	\$100,453	\$ 100,453	\$ -
Orange County	\$161,943	\$ 9,993	\$ 22,124
Person County	\$114,394	\$ 318,231	\$ 240,176
Town of Butner	\$23,393	\$ 23,393	\$ -
Town of Hillsborough	\$34,221	\$ 47,053	\$ 46,634
Town of Stem	\$11,605	\$ 11,605	\$ -
Town of Wake Forest	\$13,692	<i>Reporting in progress</i>	\$ -
Wake County	\$88,968	\$ 642,726	\$ 3,004,607
<b>Total</b>	<b>\$1,521,621</b>	<b>\$ 2,920,168</b>	<b>\$ 10,073,031</b>

Cumulative rollover accounts for all years of IAIA program accounting.

## IAIA Summary by Project Type (FY2024 to 2025)

Project Type	Number of Projects	Total funds allocated (cash and in-kind)
Project planning and administrative costs	0	\$ 0
Floodplain restoration and reconnection	0	\$ 0
Green infrastructure / best management practices (BMPs)	6	\$ 423,704
Hydrilla removal and control	3	\$ 21,456
Illicit discharge detection and elimination	1	\$ 66,281
Infrastructure Improvements	4	\$ 152,377
Land conservation	2	\$ 428,000
Programmatic measures	5	\$ 757,122
Stormwater control measures (SCMs)	4	\$ 482,326
Stream and riparian buffer restoration and enhancement	4	\$ 588,901
<b>Total</b>	<b>28</b>	<b>\$ 2,920,168</b>

# **Discuss Budget for FY2027**

# Essential Considerations for a Future UNRBA

- Determining necessary joint interests under revised Falls Lake Rules
- Projected demands for UNRBA management
- Executive Director role and support budget
- Need for monitoring, analysis, reporting, and modeling
- Tracking of NC water quality management initiatives and nutrient/watershed management issues
- Developing a plan for achieving a site-specific chlorophyll-a standard
- Ensuring that sufficient resources are allocated to support objectives for future rules and requirements

# Legal Fund Balance

\$588,204.92	24/25 YE
<u>\$100,000.00</u>	<u>25/26 Allotment</u>
\$688,204.92	Total
\$ (43,856.99)	B&T
<u>\$ (50,000.00)</u>	<u>Smith Anderson</u>
<b>\$594,347.93</b>	<b>Balance</b>

# Discuss Budget for FY2027

- The Board has requested a budget estimate for FY2027 dues at their November meeting.
- Last year, we provided a five-year projection.
- Funding for FY2027 could be reduced given the following
  - BC is continuing to expend FY2025 budget under a six-month contract extension approved by the Executive Director and communicated to the PFC and the Board
  - We estimate approximately \$80,000 unspent after December 2025 due to remaining modeling subcontractors' budgets under FY2025
  - We will not start charging to FY2026 until January
  - We will likely grant a six-month contract extension for FY2026 as well and assume similar amount will be unspent
  - Our five-year projection had a BC+subs budget for FY2027 of \$385,000

# Discuss Budget for FY2027

- For funding purposes, we could allocate from fund balance
  - Budget remaining for FY2025 (~\$80,000)
  - Likely a similar amount remaining likely at the end of FY2026 (assuming a six-month extension), (\$80,000)
  - Thus, the BC+subs FY2027 funding need could be decreased to account for FY2025 and FY2026 extensions:  $\$385,000 - 2 * (\$80,000) = \$225,000$
- Updated five-year projections
  - Monitoring to collect some data but not anticipate a five-year report (recent draft has ten-year report)
  - Legal support (assumed no funding need after FY2027)
- FY2027 will focus on rules adoption, developing the WQPP, updating the Bylaws, providing coordination (program discussion meetings/workshops, develop reporting procedures, etc.)
- FY2028 will begin the intensive process for developing a site-specific chlorophyll-a standard with DWR and developing a monitoring plan with DWR

# Revised Five-Year Projection

Contracts and Services	FY26	FY27	FY28	FY29	FY30	FY31
<b>Executive Director Services</b>	<b>231,700</b>	<b>243,285</b>	<b>255,449</b>	<b>268,222</b>	<b>281,633</b>	<b>295,714</b>
<b>Legal Support Fund</b>	<b>100,000</b>	<b>100,000</b>				
<b>Technical Contractor and Subconsultants:</b>	<b>385,000</b>	<b>375,000</b>	<b>315,000</b>	<b>430,000</b>	<b>430,000</b>	<b>430,000</b>
<i>Complete Rules Readoption through RRC</i>	182,000	30,000				
<i>Develop Joint Compliance Program, Revise Bylaws, Implement Program</i>		150,000	100,000	50,000	50,000	50,000
<i>Support Development of a Site-specific chlorophyll-a criteria</i>	25,000	25,000	25,000	100,000	100,000	100,000
<i>Support Implementation of 2011 Rules, Compare Programs</i>	25,000	15,000				
<i>Communications: meetings, workshops, status meetings</i>	60,000	60,000	60,000	60,000	60,000	60,000
<i>Monitoring Program (planning, coordination, implementation)</i>	13,000	15,000	50,000	100,000	100,000	100,000
<i>Technical Support, Data Analysis, and Reporting</i>	60,000	60,000	60,000	100,000	100,000	100,000
<i>Project management</i>	20,000	20,000	20,000	20,000	20,000	20,000
<b>Subject Matter Expert - Site-specific chlorophyll-a criteria</b>	<b>\$25,000</b>	<b>\$25,000</b>	<b>\$50,000</b>	<b>\$50,000</b>	<b>\$50,000</b>	<b>\$50,000</b>
<b>Accounting and financial services</b>	<b>13,000</b>	<b>13,650</b>	<b>14,333</b>	<b>15,049</b>	<b>15,802</b>	<b>16,592</b>
<b>Administrative costs, insurance, tax forms, etc.</b>	<b>12,300</b>	<b>12,465</b>	<b>17,638</b>	<b>12,820</b>	<b>13,011</b>	<b>18,212</b>
<i>Website improvements</i>	3,500	3,500	3,500	3,500	3,500	3,500
<i>Website hosting and maintenance</i>	5,500	5,500	5,500	5,500	5,500	5,500
<i>UNRBA Audit</i>			5,000			5,000
<i>Insurance (two policies)</i>	2,200	2,310	2,426	2,547	2,674	2,808
<i>Lobbying and registration fees and costs</i>	1,100	1,155	1,213	1,273	1,337	1,404
<b>Total</b>	<b>767,000</b>	<b>769,400</b>	<b>652,420</b>	<b>776,091</b>	<b>790,446</b>	<b>810,518</b>

PRELIMINARY

Reduces placeholder for monitoring to \$100,000 per year from \$500,000 given ten-year reports rather than five-year reports. Eliminates funding legal support fund after FY2027. Dues formula for FY2027 would be \$769,400 - 2\*\$80,000 (fund balance) = \$609,400

# Total Membership Fees Since FY2013

Fiscal Year	Budget
2013	\$259,381.00
2014	\$643,500.01
2015	\$811,999.98
2016	\$826,299.94
2017	\$978,800.02
2018	\$1,025,599.95
2019	\$1,136,265.01
2020	\$1,144,999.97
2021	\$1,152,850.05
2022	\$1,165,517.07
2023	\$1,192,892.05
2024	\$1,204,940.00
2025	\$966,700.00
2026	\$767,000.00
2027 (recommended)	\$769,400- \$160,000 [using fund balance] = \$609,400.00

# Membership Fees by Member Since FY2024-25

Member	FY2024-25	FY2025-26	Recommended* FY2026-27
Town of Butner	\$13,845.33	\$10,963.81	\$ 8,711.02
City of Creedmoor	\$9,693.09	\$7,718.80	6,132.78
City of Durham	\$212,129.18	\$162,937.56	129,457.83
Durham County	\$82,772.69	\$66,403.16	52,758.92
Franklin County	\$11,061.96	\$8,763.99	6,963.21
Granville County	\$63,310.34	\$49,747.86	39,525.87
Town of Hillsborough	\$19,075.94	\$17,023.29	13,525.41
Orange County	\$102,378.22	\$80,774.72	64,177.47
Person County	\$72,267.00	\$55,692.58	44,249.10
City of Raleigh	\$288,097.34	\$233,623.29	185,619.34
SGWASA	\$21,721.32	\$17,530.31	13,928.26
Town of Stem	\$7,303.07	\$5,962.31	4,737.20
Wake County	\$55,420.45	\$43,810.59	34,808.57
Town of Wake Forest	\$7,624.05	\$6,047.71	4,805.05
<b>Total</b>	<b>\$966,699.98</b>	<b>\$766,999.98</b>	<b>\$ 609,400.03</b>

PRELIMINARY

*\*Preliminary using last years land area and water use data and assuming use of unallocated funds.*

# **Planning PFC Workshop on Best Practices for Implementing Falls Rules**

# Planning PFC Workshop on Best Practices for Implementing Falls Rules

- Granville County and Wake County have requested a comparison and best practices across local governments for their implementation of stormwater rules and regulatory requirements within the Falls Lake Watershed
- Earlier this year, we discussed a workshop approach for UNRBA members to gather information and discuss
- We will continue planning for this workshop

# Communications

# Additional Information and Activities

- Continue meeting with DWR to work toward a joint set of rules to submit to the EMC
- Status updates to the EMC (November 12, 2025)
- Planning a meeting with the new Secretary of DEQ
- Planning a meeting with staff from the NC Office of State Budget Management
- Planning a meeting with EPA

# Other Items

# Ongoing Discussions/Issues

- DWR Neuse Watershed Model/Delivery Factors for WWTP –
  - Final modeling report presented January 28<sup>th</sup>
  - DWR provided a status update to EMC on May 8<sup>th</sup>
- 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](#))

# Closing Comments

**Next Board Meeting Scheduled for  
November 19, 2025  
9:30 AM to 12:00 PM**

**Next PFC Meeting Scheduled for  
December 2, 2025  
9:30 AM to 12:00 PM**