UNRBA PFC Meeting
June 3, 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
- Comments received following the May 6, 2025, PFC meeting on the four Falls preliminary draft rule sections
- Review FY2026 contracts
- 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 before the May 6, 2025, PFC meeting
- Comments and suggestions from participants were requested by May 20, 2025.
- All comments have been compiled in marked-up versions of the draft rules.
  - Three rules that were commented on were distributed ahead of the June 3, 2025, PFC meeting for continued discussion.
  - Comments were received from the Co-Chairs but no other comments were ~~not~~ received on the draft wastewater rule. The UNRBA is evaluating scenarios for proposed WWTP effluent concentrations consistent with best available biological nutrient removal and will re-distribute the draft wastewater rule soon. Model evaluations are ongoing.

Outstanding Issues for Discussion with DWR

- UNRBA and DWR are planning a meeting in mid-June to discuss
  - UNRBA's proposed assessment methodology
  - Constraints on WWTPs under the current rules that must be addressed
  - DWR's proposed cap on land conservation.
- Following this meeting, the draft rules will be revised as needed and redistributed to the PFC and stakeholders.
- Our goal is to distribute drafts to the UNRBA Board Directors and additional stakeholders for review and discussion at the September 18, 2025, Board meeting.

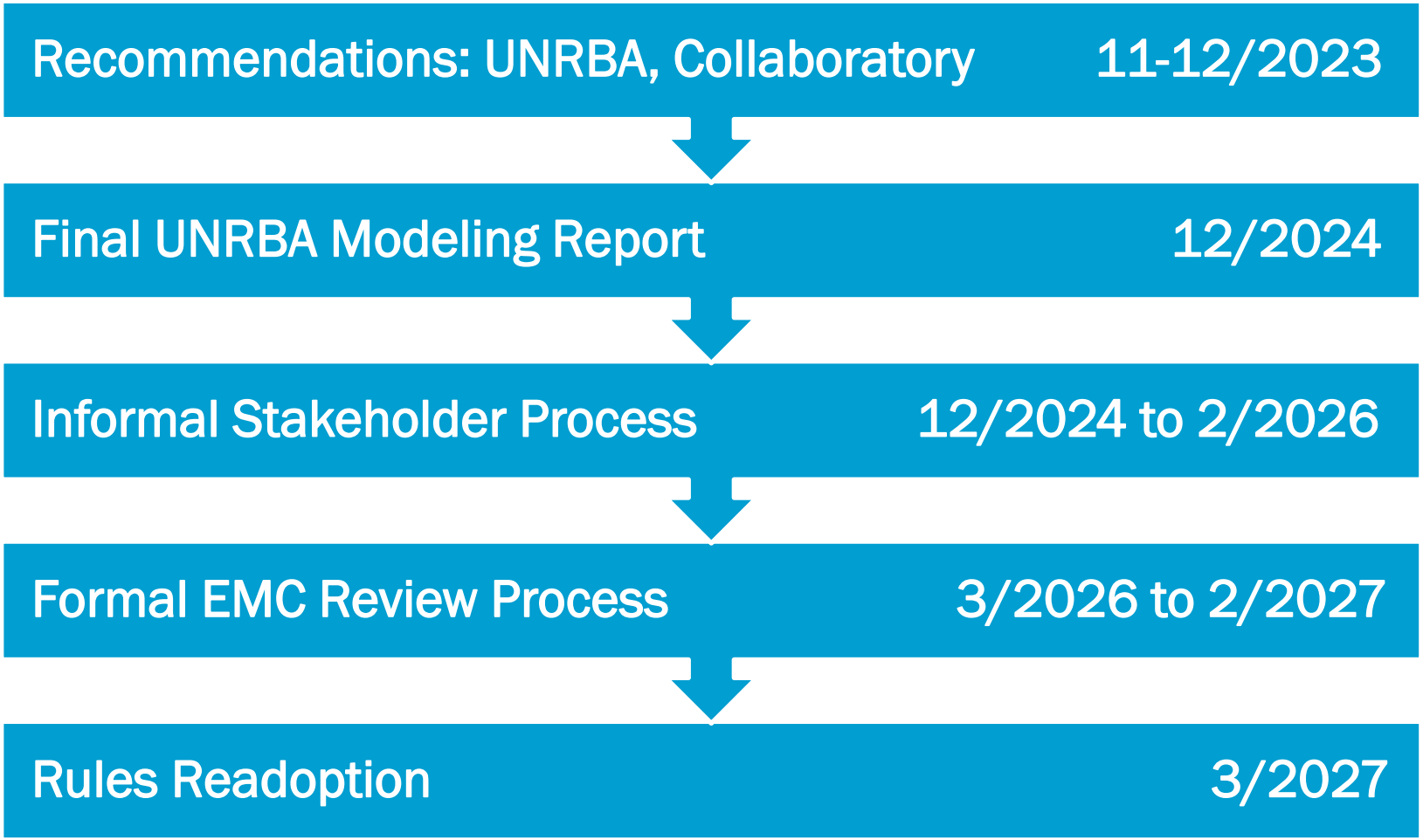
Status of Potential Legislative Change

- UNRBA considered the need for a legislative change to § 77-141 (legislation that created the Falls Lake Watershed Association which the UNRBA is doing business as) to explicitly allowed a watershed organization like the UNRBA to develop and implement a water quality protection plan (under § 143-214.14).
- We sought confirmation from Legislative Staff on the need for this revision and to confirm that current law protects the option for the UNRBA to develop a watershed protection plan for submission to the EMC.
- Legislative staff interpreted the existing legislation to provide the Falls Lake Watershed Association with statutory authority to develop a plan for EMC approval.
- Legislative staff reached out to DEQ staff and they confirmed: "Our folks (DEQ legal and program staff) agree with your interpretation of this statute to mean that the Falls Lake Watershed Association should be eligible to propose such a plan."

Need to Extend 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
  - Likely rule readoption date is in March 2027, as currently projected
  - IAIA program will need to be extended.
- During the November 19, 2025, UNRBA Board meeting, we will include a Compliance Group Committee (CGC) meeting
  - 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)

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, and Expanded Stakeholders

- 5/2025 to 2/2026
- 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

- 3/2026 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

Review Comments Received in May on the Draft-Draft-Draft Falls Rules Sections

Comments Received and Edits to Purpose and Scope Rule

General Comments - Purpose and Scope

- “UNRBA's work group process was appropriate and allowed all stakeholders input.”
- “I am in favor of the concept of a watershed plan approach. Based on UNRBA’s monitoring data and modeling, I do not believe a traditional “TMDL” approach will make a difference in the watershed, but the watershed health approach presented here will not only have positive impacts to water quality in my opinion, but will allow the continuation of the collaborative approach currently happening between jurisdictions.”
- “The draft rule proposes a site specific assessment methodology. This is absolutely critical to the success of the Falls Lake Nutrient Management Strategy. A consistent approach based on sound science is the only way to measure the health of the lake and watershed. I am also in favor of assessing uses in the lake as an additional way of monitoring health of the lake and watershed. This approach is based in sound scientific and statistical principals.”
- Request for draft stability metric during this phase

General Comments - Purpose and Scope

- “Agree with concerns about DWR’s ability to commit to monthly monitoring given resource/staff limitations. If this falls back to UNRBA, it seems to reinforce the need to continue working/partnering with DWR on approach to data collection and interpretation of data for compliance. Too much has been invested in this watershed evaluation to risk losing the ability to track long-term trends and responses associated with growth and watershed improvement strategies.”

Edits in Response to Comments

- Added “to address eutrophication related water quality standards” to opening paragraph
- Suggested additional text for opening paragraph: “These Rules shall also support an integrated water resources management approach across the Falls watershed. This approach aligns nutrient reduction efforts with other 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) Goal and Objectives: To achieve the purpose of the Falls nutrient strategy, the Commission establishes the goal of improving and maintaining nutrient-related water quality standards, including chlorophyll-a and trophic status in Falls Reservoir…

Edits in Response to Comments

- Edited Item (5)(d)(i)(C): For the purposes of evaluation compliance with water quality standards as required under Sections 305(b) and 303(d) of 33 U.S.C. §1251 the following shall be evaluated by comparison of photic zone composite chlorophyll-a concentrations, pH, and dissolved oxygen concentrations using a Falls Reservoir-specific assessment methodology over the corresponding assessment period used by the Division for other waters in the State.
- Edited Item (5)(d)(iii): (iii) Where the Division finds that assessments… indicate that nutrient-related water quality and trophic status… are attained in Falls Reservoir and are met for sufficient time to demonstrate sustained maintenance of nutrient-related water quality and trophic status, it shall notify affected parties in the watershed that further load reductions and investment in new projects are either reduced or not required for the management of nutrients from existing managed lands and wastewater treatment

Edits in Response to Comments

- Add to Item (5) as part (e): To ensure effective and equitable implementation, the Division shall evaluate and recommend funding strategies, technical assistance, and capacity-building resources to support local governments, regional organizations, and other implementation partners. The Division shall work with stakeholders to avoid the imposition of unfunded mandates and identify sustainable financing options.
- See proposed deletions to DWR five-year reporting elements associated with wastewater treatment plants previously discussed by the wastewater workgroup: inflow and effluent nutrient concentrations, comparison of actual flow to permitted flow, annual discharged nutrient loads, impacts of other rule requirements to address emerging contaminants,

Edits in Response to Comments

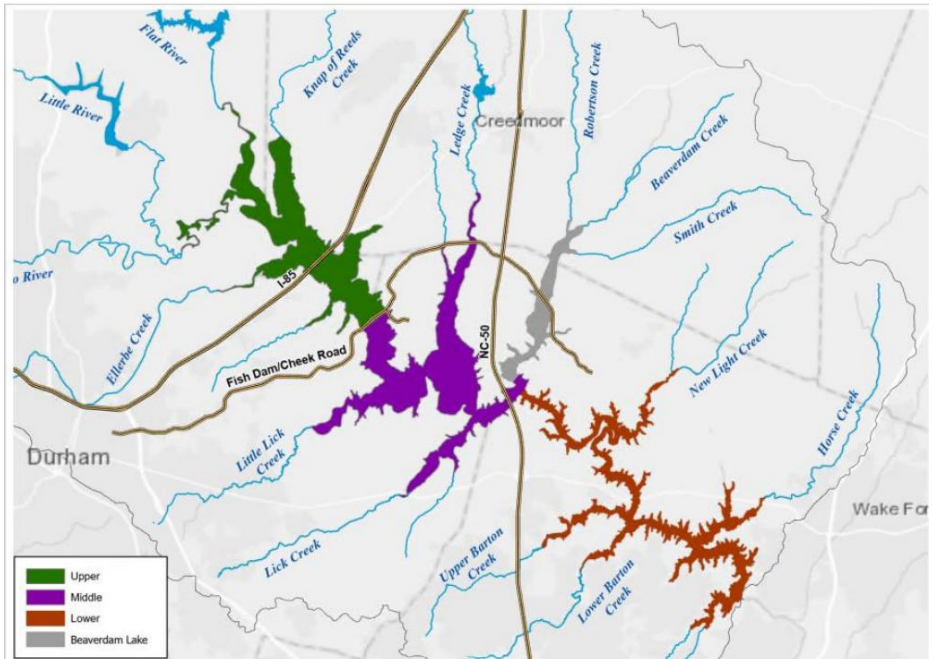
- Add new Item as (7): IMPLEMENTATION. To support integrated watershed management, the Division shall coordinate implementation of these Rules, including development of revised rules, with affected regulatory programs governing stormwater management, wastewater treatment, buffer protections, and land use planning. Rule revisions and interpretations shall seek to harmonize objectives and reduce redundancy while maintaining environmental protection and regulatory clarity.

Planned Discussion Items with DWR in June

Water Quality Assessment Units and Stations

- Three lake units consistent with EPA guidance (*based on Dr. Marty Lebo's evaluation*)
- All stations within a unit combined (*not station-by-station assessment, based on High Rock Lake Scientific Advisory Council (SAC)*)
- At least nine samples per unit per 5-yr assessment period (*based on current assessment methodology*)
- Only using stations with depth at least 6 feet at normal pool (*based on High Rock Lake SAC*)
- Using data collected with the photic zone (*two times the Secchi depth)*

NOTE: currently ~30 stations sampled monthly, or 1,800 samples per parameter per 5-yr assessment period



Minimum Monitoring to Support Implementation

- At least six stations in Falls Reservoir
  - Two stations per lake unit with one at the downstream end
  - Monthly sampling
- Mouths of Flat River, Eno River, Little River, Ellerbe Creek and Knap of Reeds Creek (largest tributaries to Falls Lake)
- DWR shall accept data from other organizations operating under a Monitoring Quality Assurance Project Plan or data provided by NPDES permit holders
- Work with local jurisdictions and the Falls Lake Watershed Association to determine when increased monitoring is warranted (changing conditions, etc.)
- Division shall develop and Commission shall approve methodology to address outliers (within six months of readoption)

Evaluations and Reporting

- Trends in nutrient loading and flow-weighted nutrient loading
- Chlorophyll-a, dissolved oxygen, pH
  - Annual data distributions over the historic record
  - Evaluation of stability (*Dr. Lebo developing metric*)
  - Comparison to water quality standards – see next slide
- Use support information (bench marked here)
  - DEQ: biovolume and algal group data collected at one station from each lake unit
  - City of Raleigh Water Utilities: quality and changes to the quality and treatability of Falls as a raw water supply
  - NC Wildlife Resources Commission: reservoir fishery and other wildlife impacts
  - Other information on aquatic life and recreation: US Army Corps of Engineers, NC State Parks, local government parks and recreational departments, and representatives of sport-fishing clubs

Comparison to Water Quality Standards

- **Not attaining:** greater than ten percent of samples with greater than or equal to ninety percent confidence exceed the water quality standard
  (*based on current methodology without the 4-sample trigger because Falls is extensively monitored and should not be penalized for that)*
- **Subsequently determined attaining:** less than ten percent exceedance of the water quality standard and greater than forty percent statistical confidence that there is less than ten percent exceedance of the standard
  (*based on current methodology without the 3-sample trigger for remaining "not meeting the standard"; also removes option if greater than 10% exceedance but less than 90% confidence)*

NOTE: this proposal consistently results in both lake units upstream of Highway not meeting the chlorophyll-a standard—this is generally consistent with DWR's current 303(d) assessment, but the proposed methodology is better grounded in scientific consideration of lakes and reservoirs with intensive monitoring.

Additional Discussion Items

- Will DWR be able to commit to monitoring a minimum of six reservoir stations and five tributary stations monthly?
  - UNRBA members feel they should not be burdened with extensive monitoring programs
- DWR is refining the list of reporting elements

Comments Received and Edits to Existing Managed Lands Rule

General Comments – Existing Managed Lands

- “I am in favor of the approach presented. The investment based approach is supported by most all stakeholders. Being able to include the state and federal landowners is important. I am ok with NCDOT having a separate approach since they operate in multiple nutrient sensitive watersheds and have their own MS4 permit. Allowing NCDOT to meet some of their requirements by allowing investment partnerships with regulated jurisdictions within the Falls Lake watershed is a great idea.”
- “I am not in favor of limiting land conservation as a tool to maintain or improve water quality in Falls Lake. It has been well documented that land conservation is a cost effective tool to protect water quality in a watershed.”

General Comments – Existing Managed Lands

- “Supportive of continuing the IAIA approach with the guardrail of at least the current level of investment. Our view is that using this approach and growing that investment will be beneficial to the overall health of the watershed, so we are pleased to see commitment to that (and for it to be tried in Jordan as well).”

General Comments – Existing Managed Lands

- The DEQ Natural and Working Lands Action Plan Recommendations address the importance of land conservation and soil amendment/improvement:
  - Protect and Restore Urban Lands
    - Promote urban forests through statewide programs to foster the retention of urban trees and their proper management.
    - Protect and restore forested lands in water supply watersheds.
  - Enhance Urban Lands
    - Improve site preparation and soil amendment during land development.
    - Research urban forestry climate adaptation and canopy baseline needs.

Edits in Response to Comments

- Proposed addition to opening paragraph: “This Rule promotes an integrated approach to water resources management that recognizes the interconnections among surface water, groundwater, stormwater, ecological function, and human needs. This Rule aims to improve hydrologic balance and generate co-benefits such as flood mitigation, carbon sequestration, biodiversity, and community wellbeing.”

Edits in Response to Comments

- Proposed additions to Item (1) Purpose:

  "(d) To promote an integrated approach to water resources management that recognizes the interconnections among surface water, groundwater, stormwater, ecological function, and human needs.

  (e) To improve hydrologic function and generate co-benefits such as flood mitigation, carbon sequestration, biodiversity, and community wellbeing. Programs and projects developed under this Rule shall promote approaches that:

  (i) Improve or maintain natural hydrologic;

  (ii) Generate multiple environmental and public health co-benefits, including improved air and water quality, wildlife habitat, carbon sequestration, and recreational access;

  (iii) Align with watershed-scale drinking water protection, flood risk reduction, and resilience planning efforts;

  (iv) Support long-term ecosystem function and sustainability."

Edits in Response to Comments

- Proposed additions to Item (4) Agriculture:

  "(4)(a) While nutrient load reduction targets for agricultural operations are not mandated under this Rule, the Division and agricultural representatives shall continue to collaboratively identify voluntary nutrient-reducing practices, prioritize those that support soil health and hydrologic function, and recognize agriculture's role in delivering environmental co-benefits such as riparian restoration, wetland enhancement, flood mitigation, groundwater recharge, and biodiversity. These rules promote participation by agriculture in joint-compliance frameworks and allow local governments and state and federal entities to provide funding for eligible conservation projects and best management practices that align with the goals of this Rule."

Edits in Response to Comments

- Proposed additions to Item (6)(h)(i) Rule implementation for consistency with other state rules/legislation:
  "Install or require installation of a new stormwater collection system in an area of existing managed lands unless the area is being redeveloped pursuant to the requirements in 15A NCAC 02B .0751 (4)(b)(ii);"

Planned Discussion Items with DWR in June

Proposed Cap on Land Conservation Investment Credit

- DWR planning staff are proposing a 15-20% cap on investment credit for land conservation as a limitation under proposed Nutrient Management Rules for Jordan Lake
- DWR has indicated they are proposing a similar cap for Falls
- UNRBA does not support a cap on investment credit for land conservation
- Land conservation is self-limiting
  - Land is very expensive and rapidly developing
  - Opportunities to identify larger tracks and owners willing to consider conservation are decreasing
  - Negotiations with landowners can be challenging
  - Eligible projects are pre-screened (water quality benefits and enhancements, small catchments, less than 30% developed, 100-ft buffers, 2% cap on impervious surface)
  - A committee of state and local environmental experts select projects that receive funding
- Conservation includes annual monitoring of buffers, active management (infestation, re-planting), and annual reporting

Additional Discussion Items

- DWR and DOT are still discussing exclusion of DOT from specific nutrient management rules and relying on regulation through existing programs and permits
- Representatives of agriculture and DWR are discussing how to refine the ag section of the rule in terms of reporting requirements, administration, etc.
- Additional outreach is needed to non-DOT state/federal entities
  - DWR working on obtaining acreages of non-DOT state/federal entities
- DWR working to streamline reporting requirements for the individual, conventional load reduction approach
- Implementation timeline for achieving required load reductions under individual, conventional load reduction approach (currently drafted at 25 years)

Comments Received and Edits to New Development Rule

General Comments – New Development

- “I am in favor with the rule as currently written, understanding that there will need to be some tweaks. I also understand that rules will need to be correctly cross-referenced.”
- “Summary slides [from 5/6/2025] and high-level discussions refer to investments in watershed health, but this terminology is not carried through to draft rule language, it defers to nutrient offset projects. This ties back to Purpose and Scope.”
  - “This draft references .0703 which requires for New D offsets to use practices that have state approved N and P credits. However, there has been discussion about allowing investment in other types of practices like stream bank restoration which do not have numeric credits. This discussion continues.”
- “We are encouraged by components of the New D rules such as an option for runoff volume match [15A NCAC 02B .0751(4)(a)] and protecting against erosive flows [same rule, (4)(g)].”

General Comments – New Development

- Concerns with potential for increased nutrient loading for projects utilizing the runoff volume match option, specifically not meeting the phosphorus loading target of 0.33 lb-P/ac/yr
  - See file for response addressing the SNAP tool, phosphorus loading targets that are currently too low and workgroup decision not to increase
- Same topic: More guidance is needed on this option. Consider Raleigh's implementation in the Neuse Rule or Wake County curve number matching as a compliance option. Unclear on how this would this align with requiring only measures that include P-removal.
  - Response: The current draft says runoff volume match or meeting the nitrogen target. DWR's current guidance on runoff volume match is that achievement meets both N and P requirements.

General Comments – New Development

- “If Falls Lake Watershed Association (FLWA) becomes a collector of offset funds, it will require significantly more administration/ processes/ procedures to ensure projects are implemented and maintained.
  - Investor-led projects---this would require a lot of logistics/guardrails as noted in your summary slide.
  - Would FLWA approved project types be available to all offset providers (banks, developers/investors)?”
- “Note that .0703 states “Providers shall demonstrate that a nutrient reduction project is designed, constructed, implemented, and sustained in a manner that, according to the best available scientific evidence, studies, and principles, will generate the estimated nutrient load reduction for the duration of time for which credits are approved.” Thus, as written, only practices with approved nutrient credits would be allowed.

General Comments – New Development

- "Support seeking credits for soil improvement on new development. See also the DEQ Natural and Working Lands Action Plan Recommendations address the importance of land conservation and soil amendment/improvement:
  - Protect and Restore Urban Lands
    - Promote urban forests through statewide programs to foster the retention of urban trees and their proper management.
    - Protect and restore forested lands in water supply watersheds.
  - Enhance Urban Lands
    - Improve site preparation and soil amendment during land development.
    - Research urban forestry climate adaptation and canopy baseline needs..

Edits to Address Comments – New Development

- Proposed addition to Item (1) Purpose:
  "(d) To support integrated watershed health by promoting practices that enhance stormwater infiltration, groundwater recharge, urban greening, and flooding resilience."
- Concerns dropping the phosphorus target
- Suggested addition and edit to address this concern: "While there is no numeric phosphorus loading target under this Rule, phosphorus reduction remains a priority. Stormwater control measures installed for the purpose of meeting this rule shall provide both nitrogen and phosphorus treatment. The Commission may revisit numeric targets based on watershed monitoring, offset market conditions, or revised modeling outcomes as described in 15A NCAC 02B .0750.

Edits to Address Comments – New Development

- Deleted reference to common plan of development in the section describing development excluded because it still would include those situations we are trying to address (e.g. a family parceling out their farm for their children; just the platting could trigger common plan of development.) Also discussed examples where a realtor's marketing brochure triggers homes as a common plan of development even though they are not.
- Added exclusion for projects with more than 5% but not more than 12% BUA if it "provides passive treatment of site runoff from built upon areas that is not directly discharged via a pipe or other impervious conveyance to an intermittent or perennial stream as defined in 02 NCAC 60C .0102 or jurisdictional wetland as defined in SL 2023-63"

Outstanding Discussion Items

- Exclusion of DOT from specific nutrient management rules and relying on regulation through existing programs and permits
- Reporting requirements (see 2023 case)
- Approval of soil improvement nutrient credits for new development
- How to apply the 12% BUA threshold for requiring onsite credits to redevelopment projects with a net increase in BUA
- Option for developers to invest in watershed health projects
  - Logistics
  - Guardrails
- Better rule reference for excluded activities related to agricultural operations

Status of Preliminary Draft Wastewater Rule

Status of the Wastewater Rule

- Comments were not received on the draft wastewater rule following the May 6th meeting except from the PFC Co-Chairs.
- The UNRBA is evaluating scenarios for proposed WWTP effluent concentrations consistent with best available biological nutrient removal, looking at projected impacts to lake quality from each scenario
- UNRBA will re-distribute the draft wastewater rule and modeling results soon.

Planned Discussion Items with DWR in June

Correcting Allowable Loads in WWTP Permits

- Permits include permitted flows and Stage I allowable loads based on flow rates near 2008/2009 levels
  - Stage I and Stage II allocations require similar effluent concentrations at permitted flow
  - Neither allow WWTPs to use full capacity
  - Both require reverse osmosis which is unproven for this application and has significant logistical challenges
  - Upgrades would require investment of financial resources never anticipated or expected under Stage I
  - Significantly increased carbon footprint
- The UNRBA draft proposal addresses this by requiring
  - Treatment performance at best achievable technology
  - Tracking of emerging technologies and optimization
  - Investment of combined $500k in watershed health
  - Monthly monitoring in receiving streams and Falls Lake to support adaptive management as flows increase
  - Use of predictive modeling to evaluate chlorophyll-a

Next Steps and Meeting with DWR

Next Steps and Meeting with DWR

- There remain outstanding issues for discussion with DWR.
- UNRBA and DWR are planning a meeting in mid-June to discuss the UNRBA's proposed assessment methodology, constraints on WWTPs under the current rules that must be addressed, and DWR's proposed cap on land conservation.
- Following this meeting, the draft rules will be revised as needed and redistributed to the PFC and stakeholders for review and input
- Our goal is to distribute drafts to the UNRBA Board Directors and additional stakeholders for review and approval at the September 18, 2025, Board meeting
- We plan to submit the draft rule package to the EMC at the November 2025 meeting

Status of FY2026 Contracts

Board Approved Budget Expenditures for FY2026

Executive Director Services	**$231,700** ★
Legal Support Fund	**$100,000**
Technical Contractor and Subconsultants:	**$385,000** ★
Complete Rules Readoption and Fiscal Analysis	$182,000
Develop Joint Compliance Program, Revise Bylaws, Implement Program	
Develop Site-specific chlorophyll-a criteria	$25,000
Support Implementation of Current Rules, Compare Programs	$25,000
Communications: meetings, workshops, status meetings	$60,000
Monitoring Program (preliminary planning, coordination)	$13,000
Technical Support, Modeling, Data Analysis, and Reporting	$60,000
Project management	$20,000
Subject Matter Expert - Site-specific chlrophyll-a criteria	**$25,000** ★
Accounting and financial services	**$13,000**
Administrative costs, insurance, tax forms, etc.	**$12,300**
Website improvements	$3,500
Website hosting and maintenance	$5,500 ★
UNRBA Audit	
Insurance (two policies)	$2,200
Lobbying and registration fees and costs	$1,100
Total	**$767,000**

★ Contracts to be considered by the Board June 18, 2025.

Status of FY2026 Contracts

- The UNRBA Board of Directors approved the budget for FY2026 during the March 19, 2025, meeting.
- The contractor and Executive Director developed a draft Modeling, Regulatory, and Communications Support Contract and Scope of Work for FY2026.
- The PFC will review and discuss the scope of work for this contract during the June 3, 2025, meeting.
- Contracts for Executive Director services, website support, and Dr. Martin Lebo will also be reviewed at the June Board meeting
- The current Financial Services Support contract extends through June of 2026.
- The Board of Directors will review and consider approval of the contracts and scopes of work during the June 18, 2025, meeting.

Communications

Additional Information and Activities

- Distribution of draft-draft-draft rules to 90 PFC members and stakeholders for discussion at the May 6, 2025, PFC meeting; additional stakeholders will be included when the draft goes to the Board by September 2025
- Draft letter to clarify DWR's informational item at the May 8, 2025, EMC meeting
- Status updates to the EMC
- The UNRBA has posted YouTube videos of the Falls Lakes water quality simulations to the website
- 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

- DWR Neuse Watershed Model/Delivery Factors for WWTP –
  - Final modeling report presented January 28th
  - DWR provided a status update to EMC on May 8th
- 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
- Distribution of materials from Rajesh (Raj) Laddha, who owns River Delta Consulting, on the NC Tech Association

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 PFC Meeting Scheduled for July 1st as an abbreviated virtual check in from 9:30 AM to 10:30 AM