



UNRBA PFC Meeting

June 2, 2026

9:30 AM to 12:00 PM



Virtual Meeting Only

(see agenda for remote access instructions)

Agenda

- Opening comments, agenda review/revisions
- Status of IAIA Extension and Reminder for Year-End Reports
- Status and timeline for Falls rules readoption and review of DWR's most recent draft
- FY2027 Budget and Contract Process
- Planning PFC Workshop on Best Practices for Implementing Falls Rules
- Communications
- Other Items
- Closing comments

Opening Comments, Agenda Review/Revisions

Status of IAIA Extension and Reminder for Year-End Reports

Status of IAIA Extension

- Leadership from the NC Division of Water Resources (DWR) has confirmed with their lawyers and the Chair and Executive Director of the NC Environmental Management Commission (EMC) that the EMC does not need to approve extension of the Stage I Existing Development Interim Alternative Implementation Approach (IAIA) Program.
- UNRBA's modification of the Bylaws is sufficient documentation for extension of the Program.
- This item was included in the May EMC meeting as an information item.
- Forrest has requested a letter of confirmation from DWR

Reminder for Year-End Reports

- The fifth year of the IAIA ends June 30, 2026.
- IAIA participants are required to submit annual reports to DWR (John Huisman) by September 30th
- Please copy Forrest and Alix on your submission so we can compile the UNRBA Annual Summary Report which will be reviewed and considered for approval by the UNRBA Compliance Group Committee at their November 18, 2026, meeting.
- The UNRBA Annual Summary Report is due to DWR by November 30th each year
- The spreadsheet-based reporting template is available under the “IAIA” heading on the UNRBA website Resource Library: <https://unrba.org/resource-library>.
- **Manually enter rollover from the FY2025 report if applicable**

Status and Timeline for Falls Rules Readoption

Status of Development of Draft Rule Language

Rule Section	Status
Purpose and Scope, Existing Managed Lands, New Development	<ul style="list-style-type: none"> • PFC discussed DWR’s February drafts at March PFC meeting • PFC provided comments during and following the meeting • Board discussed concerns at their March meeting • UNRBA and DWR staff discussed rules again on April 1st and the PFC discussed April 7th • DWR provided updated drafts on April 22nd
Agriculture	<ul style="list-style-type: none"> • PFC discussed DWR’s February drafts at the March PFC meeting – no changes since the Feb draft
Wastewater	<ul style="list-style-type: none"> • DWR and UNRBA discussing since September 2025 • PFC and Board provided comments during the March and April meetings • DWR provided draft on April 22nd – First Draft since last year

- We are scheduling meetings with DWR to resolve issues that we discussed in detail at the May PFC meeting. We will summarize the high-level information shared with the Board at their May meeting. **Please provide additional feedback as we move through these high-level summaries.**
- Stakeholders will review refined drafts and DWR will host an “all stakeholders” meeting before rules are submitted for consideration by the WQC.

UNRBA Comments on DWR's April Draft Purpose and Scope (PS) Rule

PS: Summary of DWR Improvements

- Goal is to achieve the water quality standard
- Reference the previous rules and required reductions from regulated sources of 30% N and 70% P
- Added “readily available” elements to the 5-year reporting
- Removed compliance with the P&S rule from enforcement
- Included alternative regulatory framework language
- Included “offramp” for sub-basins if segments of the lake are meeting standard
 - Still needs further discussion and clarification on implementation
- Edited to “significant anthropogenic” sources in Scope Item

PS: Summary of Outstanding Issues

- Narrative should include that the lake is stable and there are no ecological problems
- The language should remove the word “restore” because there is no previous condition in the reservoir that is better than the current water quality.
 - Replace with “maintain and improve” water quality
- Referenced reductions of 30/70 still would not meet the standard and risk of third-party lawsuits remains; not required with a 4B Plan
- Relies on the Nutrient Criteria Development Plan (NCDP) to develop a site-specific standard without direct reference to UNRBA participation
- Does not adequately address need for tributary monitoring

UNRBA Comments on DWR's April Draft New Development (ND) Rule

ND: Summary of Improvements

- DWR provided more specificity when cross references Rule Items
- DWR deleted confusing language noted by UNRBA member

ND: Summary of Outstanding Issues

- DWR/UNRBA planning a working meeting to refine the April 22nd DWR draft New Development Rule
 - Allow for use of updated SNAP tool when vetted and approved
 - Address development at institutions (or require consultation with DWR/DEMLR for case-by-case approach)
 - Want to include representatives from members – please volunteer today
- DWR's language says local government rules can be more restrictive than state/federal law (red flag for some stakeholders)

UNRBA Comments on DWR's April Draft Existing Managed Lands (EML) Rule

EML: Summary of DWR Improvements

- Full and immediate credit for all activities after 2006
- Allows up to 50% of investment requirement to go toward recurring costs like operation and maintenance of projects
- Deleted the auditing language
- Allows subsequent versions of the NC Stormwater Control Measure Credit Document
- Added language supporting an integrated water resources management approach
- Removed forward-looking planning requirements for investment-based approaches
- Allowed more time for revisions to program plans

EML: Summary of Outstanding Issues

- Additional discussion on how to reference existing development category in the UNRBA watershed model
 - UNRBA/DWR will work to resolve
- Need to reference an EMC-approved Program Document rather than listing practices in rule
- Investment credit for education and outreach was intentionally omitted; maybe count under programmatic activities; required element of MS4 permits
- Requirement to track expenditures is overly burdensome for local governments selecting nutrient-based compliance
- Discrepancy with new development rule and the updated stormwater tool for existing development (discussing with DWR)

UNRBA Comments on DWR's April Draft Wastewater (WW) Rule

Summary of DWR's Draft WW Rule

- Includes option for group compliance
- Maintains Stage II reduction requirements for smaller facilities (discharging less than 0.1 MGD)
- Includes provision to revisit overall allocations or assignments due to changes in
 - Goals, treatment technologies, or site-specific standard
 - Revised nutrient reduction targets
 - Acquisition of point or nonpoint load allocations

Concerns with DWR's Draft WW Rule

- The purpose of the WW Rule should be to meet the standard, not the referenced nutrient load reductions
- Unless allocations are revised later, the rules limit WW capacity to current permitted capacity (28.5 MGD)
 - Discharge cap is 160,000 pounds of nitrogen per year (lb-N/yr) which is not achievable at permitted flow
 - Purchasing offset credits capped at 100,000 lb-N/yr at a cost of ~\$50 million (just to use your full permitted capacity)
 - No additional discharge or offset credits allowed
 - Requires phosphorus reductions of 63% estimated to cost ~\$500,000 per year to achieve
- Plants exceeding discharge allocations, even if short-term, would have to permanently offset the overage

Concerns with DWR's Draft WW Rule

- This is unnecessary and unsupportable approach—there is no basis to cap loading
 - Durham had already upgraded prior to baseline
 - Hillsborough is going to run out of allocation soon
 - Our region is projected to increase by 3 million people and 2 million jobs over the next 30 years
 - We need long-term solutions that fit the science and anticipate growth, not stifle growth

Concerns with DWR's Draft WW Rule

- Requirements will not impact water quality
 - WWTPs are only 5 to 10 % of the loading to the lake
 - Modeling shows little difference between discharging 260,000 or 160,000 pounds of nitrogen
 - 5-stage treated effluent is not readily treatable or bioavailable
- The rule should not place more restrictive requirements on the WWTPs in this watershed than in other watersheds.
- The offset credit provisions need to be evaluated carefully.

Concerns with DWR's Draft WW Rule

- Statutes require that costs and economic impacts be considered when adopting rules
- There is no way to achieve the standard as applied
- These rules will negatively impact regionalization because requirements across basins would differ
- Utilities cannot charge different rates to different customers based on basin
- The costs of WWTP upgrades fall on rate payers
 - Limited number of accounts
 - Not recipients of the water supply benefits
 - Service areas include census tracts with more than 24% of households below the poverty line

Presentations to EMC WQC May 13, 2026

- The Executive Director [presented](#) the challenges with wastewater rule
- DWR also [presented](#) their recommendations for the wastewater rule (three options for WW rule)

	Option 1	Option 2	Option 3
Nitrogen	Stage I	Baseline*	Baseline*
Phosphorus	Stage I	BAT @ 100% Flow	Stage I
Nitrogen (lbs/yr)	130,507	163,704	163,704
Phosphorus (lbs/yr)	14,469	8,675	14,469

- The Executive Director will summarize the EMC WQC discussion during the meeting.

UNRBA Recommendations

UNRBA's Proposed Rules

- Continue to manage nutrients in the watershed and work toward achieving the standard
- Invest in watershed health and provide multi-benefits
- Wastewater treatment plants (WWTPs)
 - Continue treating at limits of technology (5-stage biological nutrient removal, BNR)
 - Be allowed to use their permitted capacity – modeling shows insignificant changes in water quality even at 100% permitted capacity
- New development – continue implementing nutrient controls
- Existing development – continue investment in watershed health

Executive Director Team's Recommendation

- Concerns noted in DWR's draft should be addressed and revised before DWR moves the rules to the EMC.
- The PFC discussed this at the May meeting and agreed that significant revision to DWR's rules is needed.
- The PFC agreed that any final draft rules for EMC consideration must include an appropriate wastewater rule.
- DWR staff indicated their commitment to continue working with the UNRBA on refinements to the rules.
- Executive Director reviewed this summary with the Board on May 20, 2026

The Executive Director will seek feedback from the PFC members.

Overall Comment for April Drafts

- DWR's overall suggestion April 1st was to move forward with the rules readoption process including percent reduction requirements in the Purpose and Scope and changing wastewater allocations back to baseline levels and agree to work on these “big picture” items in the following years:
 - Assessment methodology
 - Site-specific standard
- These drafts need additional work before taking any rules forward. The issues in P&S, ND, and EML are relatively straight forward and should be able to be addressed.
- On WW, there is little likelihood that DWR will be willing to address this—remains a huge issue for the UNRBA

FY2027 Budget and Contract Process

FY2027 Budget and Contract Process

- The Board approved the budget for FY2027 and sources of funding proposed by the PFC at their March meeting
- The Executive Director has worked with the contractors to develop draft contracts and scopes of work
 - Brown and Caldwell for the Modeling and Regulatory Support and Communications Support Project
 - Jones & Company for financial services
 - Bought current firm (WWCEJ & Company)
 - Staff working for UNRBA will remain engaged
- The Executive Director Services contract will also be updated consistent with previous Board approval
- The Executive Director will work with WSP (Dr. Martin Lebo) on a revised contract when needed
- Contracts and scopes of work will be finalized for approval by the Board at their June meeting

FY2027 Board Approved Budget Expenditures

Contracts and Services	FY27
Executive Director Services	326,700
Legal Support Fund	100,000
Technical Contractor and Subconsultants:	335,000
<i>Finalize Nutrient Management Strategy for Falls Lake</i>	70,000
<i>Regulatory Support, Planning, Prelim. Dev. of Implementation Plan</i>	70,000
<i>Support Development of a Site-specific Chlorophyll-a Criteria</i>	25,000
<i>Support Implementation of 2011 Rules, Compare Programs</i>	15,000
<i>Communications: Meetings, Workshops, Status Meetings</i>	60,000
<i>Monitoring Program (planning, coordination, implementation)</i>	15,000
<i>Technical Support, Data Analysis, and Reporting</i>	60,000
<i>Project Management</i>	20,000
Subject Matter Expert - Site-specific chlorophyll-a criteria	\$25,000
Accounting and financial services	13,650
Administrative costs, insurance, tax forms, etc.	12,465
<i>Website improvements</i>	3,500
<i>Website hosting and maintenance</i>	5,500
<i>UNRBA Audit</i>	
<i>Insurance (two policies)</i>	2,310
<i>Lobbying and registration fees and costs</i>	1,155
Total of potential contracts:	812,815
Dues assume MRS&CS rollover of \$160,000 (FY25+26 combined) and \$43,415 from unallocated funds:	609,400



★ Contracts to be considered by the Board June 17, 2026.



FY2027 Budget by Task for MRS&C

Task	BC Labor	Subs and Expenses	Total	Subcontractor/ Expense Notes
715 Finalize Nutrient Management Strategy for Falls Lake	\$ 55,000	\$ 15,000	\$ 70,000	Brindle Creek
725 Regulatory Support, Planning, Prelim Implementation Plan	\$ 70,000		\$ 70,000	
735 Site-specific chlorophyll-a criteria or assessment methodology	\$ 25,000		\$ 25,000	
745 Support Implementation of Current Rules	\$ 15,000		\$ 15,000	
755 Communications: meetings, workshops, status meetings	\$ 55,000	\$ 5,000	\$ 60,000	Mileage, food, rentals, etc.
765 Monitoring Program (prelim planning and coordination)	\$ 15,000		\$ 15,000	
775 Technical Support, Data Analysis, and Reporting	\$ 50,000	\$ 10,000	\$ 60,000	KDV
785 Project management	\$ 20,000		\$ 20,000	
Total	\$ 305,000	\$ 30,000	\$ 335,000	

Notes: Budget for sub-contractors will be increased incrementally as needs arise including for the watershed and lake modeling firms.
 Unallocated funds may be needed depending on level of effort.

FY2027 Dues Following Updated Jurisdictional Areas and Water Withdrawal Amounts for 2025

Member	Base Rate (10%)	2025 Raw Water Demands (50%)			Jurisdiction's Land Area			FY 2026-27 Dues
	\$ 60,940.00 Member's Sub-Share of Cost	2025 Average Raw Water Demand (MGD)	\$ 304,700.00 (%)	Member's Sub-Share Cost	Jurisdiction's Acres Within Watershed	\$ 243,760.00 (%)	Member's Sub-Share Cost	Total Membership Dues
Town of Butner	\$ 4,352.86	NA			\$ 9,061.40	1.9	\$ 4,542.94	\$ 8,895.80
City of Creedmoor	\$ 4,352.86	NA			\$ 3,843.00	0.8	\$ 1,926.69	\$ 6,279.55
City of Durham	\$ 4,352.86	28.900	35.0	\$ 106,569.41	\$ 35,962.00	7.4	\$ 18,029.58	\$ 128,951.85
Durham County	\$ 4,352.86	NA			\$ 89,802.40	18.5	\$ 45,022.51	\$ 49,375.37
Franklin County	\$ 4,352.86	NA			\$ 5,284.00	1.1	\$ 2,649.14	\$ 7,002.00
Granville County	\$ 4,352.86	NA			\$ 70,959.60	14.6	\$ 35,575.65	\$ 39,928.51
Town of Hillsborough	\$ 4,352.86	1.990	2.4	\$ 7,338.17	\$ 4,123.98	0.8	\$ 2,067.56	\$ 13,758.59
Orange County	\$ 4,352.86	NA			\$ 121,081.72	24.9	\$ 60,704.42	\$ 65,057.28
Person County	\$ 4,352.86	NA			\$ 80,760.00	16.6	\$ 40,489.09	\$ 44,841.95
City of Raleigh	\$ 4,352.86	49.200	59.5	\$ 181,426.12	\$ 1,856.00	0.4	\$ 930.51	\$ 186,709.49
SGWASA	\$ 4,352.86	2.54	3.1	\$ 9,366.31	NA	NA	NA	\$ 13,719.17
Town of Stem	\$ 4,352.86	NA			\$ 778.00	0.1	\$ 390.05	\$ 4,742.91
Wake County	\$ 4,352.86	NA			\$ 61,779.00	12.7	\$ 30,972.95	\$ 35,325.81
Town of Wake Forest	\$ 4,352.86	NA			\$ 915.35	0.2	\$ 458.91	\$ 4,811.77
Total	\$ 60,940.04	82.63	100	\$ 304,700.01	\$ 486,206.45	100	\$ 243,760.00	\$ 609,400.05

Membership Fees by Member Since FY2024-25

Member	FY2024-25	FY2025-26	FY2026-27
Town of Butner	\$13,845.33	\$10,963.81	\$8,895.80
City of Creedmoor	\$9,693.09	\$7,718.80	\$6,279.55
City of Durham	\$212,129.18	\$162,937.56	\$128,951.85
Durham County	\$82,772.69	\$66,403.16	\$49,375.37
Franklin County	\$11,061.96	\$8,763.99	\$7,002.00
Granville County	\$63,310.34	\$49,747.86	\$39,928.51
Town of Hillsborough	\$19,075.94	\$17,023.29	\$13,758.59
Orange County	\$102,378.22	\$80,774.72	\$65,057.28
Person County	\$72,267.00	\$55,692.58	\$44,841.95
City of Raleigh	\$288,097.34	\$233,623.29	\$186,709.49
SGWASA	\$21,721.32	\$17,530.31	\$13,719.17
Town of Stem	\$7,303.07	\$5,962.31	\$4,742.91
Wake County	\$55,420.45	\$43,810.59	\$35,325.81
Town of Wake Forest	\$7,624.05	\$6,047.71	\$4,811.77
Total	\$966,699.98	\$766,999.98	\$609,400.05

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 after we get to a more stable status on the rules' drafting process with DWR resulting hopefully in rules that the UNRBA can “accept”

Communications

Additional Information and Activities

- Reviewing existing information for jurisdictional use in developing presentations and handouts
 - [Infographic](#)
 - [Fact Facts](#)
 - Presentation materials as requested
 - Provided copies of these at the January Board Meeting
- Continue meeting with DWR to work toward a joint set of rules to submit to the WQC
- Next EMC WQC: July 8, 2026
- Planning a meeting with staff from the NC Office of State Budget Management in coordination with DWR
- Planning additional meeting(s) with EPA, linking in DWR as appropriate

Other Items

Ongoing Discussions/Issues

- NCSU streambank erosion loading website and spatial data available soon
- Upcoming presentation by NC State University on the 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

Closing Comments

**Next Board Meeting Scheduled for
June 17, 2026; 9:30 AM to 12:00 PM**

**Next PFC Meeting Scheduled for
July 7, 2026; 9:30 AM to 12:00 PM**