



ROY COOPER
Governor
MICHAEL S. REGAN
Secretary
LINDA CULPEPPER
Interim Director

MEMORANDUM

October 10, 2018

To: Interested Parties in the Jordan and Falls Lake Watersheds
From: Linda Culpepper *LC*
Subject: Approval of Stormwater Nitrogen and Phosphorus Tool (SNAP) v4.1

With this memorandum, I am approving use of the Excel spreadsheet tool entitled Stormwater Nitrogen and Phosphorus Tool v4.1, or SNAP v4.1, and its associated Users' Manual for regulatory compliance with stormwater requirements of the Falls and Jordan nutrient strategies, and for alternative riparian buffer mitigation compliance in all watersheds with buffer regulations, as detailed below. SNAP v4.1 will be the Division-approved tool for calculating nutrient export from developed lands in the applicable watersheds until such a time that a substantially revised or replacement tool is approved. Minor revisions to SNAP may be released by staff from time to time without Director approval to add approved stormwater control measures and address bugs and errors, and will be denoted as v4.1.x.

SNAP v4.1 is approved for purposes of calculating stormwater runoff nutrient loads and load reductions to meet the requirements of the Falls Lake nutrient strategy rules for New Development (15A NCAC 02B .0277) and Existing Development (.0278), and in both the Falls and Jordan Lake watersheds for State and Federal Entities (.0281 and .0271) not including NCDOT. SNAP v4.1 will replace the current approved nutrient accounting tool, the Jordan/Falls Lake Stormwater Nutrient Load Accounting Tool version 2.0, or Jordan/Falls v2, where it is currently used.

Local programs implementing the above Rules will need to require its use on all development projects subject to the rules' nutrient export calculation requirements beginning April 15, 2019 and shall make any necessary ordinance changes in the interim. Local governments are not obliged to accept its use by



applicants prior to that date, but may choose an earlier date for mandatory use. As of the switchover date, results calculated using Jordan/Falls v2 will no longer be accepted by local permitting programs or the Division for meeting nutrient export calculations. State and federal entities submitting applications to the Division may begin using SNAP v4.1 now, but where local governments exercise permitting authority over state or federal projects, those projects shall abide by the local switchover date.

SNAP v4.1 is also approved for immediate use in all parts of the State to quantify nutrient load reductions by stormwater control measures under the stormwater treatment option of the alternative riparian buffer mitigation requirements found in rule 15A NCAC 02B .0295. **Version 2.0 of the Jordan/Falls v2 shall not be used for calculating alternative riparian buffer mitigation credits.**

SNAP v4.1 has been under development for several years and has been refined based on two rounds of public comment in October 2016 and April 2017. It provides a range of significant improvements from the existing Jordan/Falls v2. SNAP v4.1 retains the original delivery factors for the Jordan Lake watershed, and 100% delivery factors in all parts of the Falls Lake watershed.

While SNAP v4.1 has been set up to calculate nutrient loading for the Tar-Pamlico watershed and the Neuse watershed below Falls Lake, it is not approved for use in those areas at this time. The Division intends to make it available in conjunction with the implementation of revised stormwater rules for those watersheds that are currently in the formal rules readoption process. In the meantime, an expanded set of stormwater control measures and revised nutrient reduction efficiencies will be made available through DEMLR's "North Carolina Stormwater Control Measure Credit Document". A guidance memo is forthcoming on this subject.

Feel free to contact Nonpoint Source Planning staff to discuss use of SNAP v4.1:

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- Neuse/Tar-Pamlico strategy implementation – Jim Hawhee, jim.hawhee@ncdenr.gov, 707-3675
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