

REGIONAL REVIEW FINDING

Atlanta Regional Commission • 229 Peachtree Street NE | Suite 100 | Atlanta, Georgia 30303 • ph: 404.463.3100 fax: 404.463.3205 • atlantaregional.org

DATE: JANUARY 7, 2025

TO: ATTN TO: FROM: CHAIRWOMAN ROMONA JACKSON JONES, Douglas County

TO: ALISON DUNCAN, PLANNING AND ZONING MANAGER, DOUGLAS COUNTY

: Anna Roach, Executive Director, Atlanta Regional Commission

ARC has completed a regional review of the following proposal and made the below finding. ARC reviewed the proposed project's relationship to regional plans, goals, and policies and impacts it might have on the activities, plans, goals, and policies of other local jurisdictions and state, federal, and other agencies.

<u>Name of Proposal:</u> RC-24-03DC Dog River Dam and Reservoir Construction <u>Submitting Local Government</u>: Douglas County

Date Opened: December 2, 2024 Date Closed: January 7, 2025

<u>FINDING</u>: ARC staff have completed a review of a MRPA application for this project in the Chattahoochee River Corridor. ARC's finding is that the project is equivalent to a project consistent with the Chattahoochee River Corridor Plan.

Additional Comments: No comments were received.

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:

ATLANTA REGIONAL COMMISSION NATIONAL PARK SERVICE CITY OF DOUGLASVILLE COWETA COUNTY CEORGIA DEPARTMENT OF NATURAL RESOURCE GEORGIA CONSERVANCY CITY OF CHATTAHOOCHEE HILLS CHATTAHOOCHEE RIVERKEEPER DOUGLAS COUNTY CARROLL COUNTY

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For questions, please contact Donald Shockey at (470) 378-1531 or <u>dshockey@atlantaregional.org</u>. This finding will be published to the ARC website at https://atlantaregional.org/plan-reviews.

ALLISON DUNCAN, AICP Planning & Zoning Manager

PHIL SHAFER Zoning Administrator

AUSTIN CRONAN Planner



JOHANNAH WOMACK Clerk of the Planning & Zoning Board

KIMBERLY WATTERS Department Secretary

DOUGLAS COUNTY BOARD OF COMMISSIONERS

PLANNING & ZONING DEPARTMENT 8700 Hospital Drive • Douglasville, GA 30134 Telephone (770) 920-7241 • Fax (678) 715-5366

October 28, 2024

Jim Santo c/o Atlanta Regional Commission 229 Peachtree Street Ste 100 Atlanta GA 30303

Dear Mr. Santo:

Douglas County is in receipt of an application for Metro River Review for the Douglasville-Douglas County Water and Sewer Authority Modification of the existing Dog River Reservoir Main & East Dam and construction of a new spillway. I believe that ARC and the Metro North Georgia Water Planning District are aware of this project, and it is reflected in the long-range plans of both agencies.

I am enclosing a completed application for review under the Metropolitan River Protection Act, as well as supporting documentation submitted by the Douglasville-Douglas County Water and Sewer Authority. As this review is submitted for a project undertaken by a public agency, it is exempt from fees. If you need any additional information at this time, please contact me at your convenience.

Sincerely,

Allison Duncan, AICP Planning and Zoning Manager

Enclosure

APPLICATION FOR METROPOLITAN RIVER PROTECTION ACT CERTIFICATE

1.	Name of Local Government: Douglas County, Georgia				
2.	Owner(s) of Rec	ord of Property to be Review	ed:		
	• •			s County Water and Sewer Authority	
	· /	dress:P.O. Box 1157		,	
	City: Dougla		State: Georgia	Zip: 30133	
	•	one Numbers (w/Area Code):			
		Phone: DDCWSA - (770)-949-	7617 Fax:DDCWS	SA - (678)-631-1515	
	•	umbers:			
3.	Applicant(s) or	Applicant's Agant(s).			
э.		Applicant's Agent(s): uglasville-Douglas County Water	and Sower Authority: Ic	son Warmauth	
		dress: P.O. Box 1157	and Sewer Authonity. Ja		
	City:Douglas		State:Georgia	Zip:30133	
		one Numbers (w/Area Code):	State. <u>Georgia</u>	Zip: <u>30133</u> _	
		e Phone: (678)-689-8466	Fax:(678)-63	31-1515	
		umbers: DDCWSA Office (770)-			
	Other IV				
4.	Proposed Land o	or Water Use:			
	-	velopment:Dog River Reservoir	- Second Raise of Dog	River Dam	
		of Proposed Use: Modification			
		of a new spillway to provide a relia			
5.	Property Descrip	ption (Attach Legal Descript	on and Vicinity Mar	b):	
				3rd District, 5th Section, Douglas Count	
	LATITUDE: 3	3 36 23.46"N LONGÍTUDE: 84 47	15.54"W	·····	
	Subdivision	, Lot, Block, Street and Addr	ess, Distance to Near	rest Intersection:	
		elopment (Use as Applicable):			
	Acres:	Inside Corridor: 100.34 Acre			
		Outside Corridor: 338.43 A	cres		
		Total: 438.77 Acres			
	Lots:	Inside Corridor:			
		Outside Corridor:			
		1 otal:			
	Units:	Inside Corridor:			
		Outside Corridor:			
		Total:			
	Other Size l	Descriptor (i.e., Length and V			
		Inside Corridor:	, 		
		Outside Corridor:			
		Total:			

- 6. Related Chattahoochee Corridor Development:
 - A. Does the total development include additional land in the Chattahoochee Corridor that is not part of this application? NO If "yes", describe the additional land and any development plans:

B. Has any part of the property in this application, or any right-of-way or easement bordering this land, previously received a certificate or any other Chattahoochee Corridor review approval? YES
If "yes", please identify the use(s), the review identification number(s), and the date(s) of the review(s): RC-06-03DC, April 5, 2006; RC-22-01DC, March 2022

- 7. How Will Sewage from this Development be Treated?
 - A. Septic tank None proposed

Note: For proposals with septic tanks, the application must include the appropriate local government health department approval for the selected site.

- **B.** Public sewer system No connections proposed
- 8. Summary of Vulnerability Analysis of Proposed Land or Water Use:

Vulnerability Category	Total Acreage (or Sq. Footage)	Total Acreage (or Sq. Footage) Land Disturbance	Total Acreage (or Sq. Footage) Imperv. Surface	Percent Percent Land Imperv. <u>Disturb. Surf.</u> (Maximums Shown In Parentheses)
А	1.44 AC	1.44 AC	0.41 AC	(90) <u>100.00</u> (75) 28.13
B	0.11 AC	0.11 AC	0	(80) <u>100.00</u> (60) <u>0</u>
C	41.35 AC	41.35 AC	12.91 AC	(70) <u>100.00</u> (45) <u>3</u> 1.22
D	25.05 AC	25.05 AC	4.15 AC	(50) <u>100.00</u> (30) <u>16.57</u>
E	32.39 AC	31.09 AC	8.69 AC	(30) <u>95.98</u> (15) <u>27.9</u> 5
F	0	0	0	(10) (2)
Total:	100.34 AC	99.04 AC	26.16 AC	N/A N/A

This property has 100.34 acres in the Chattahoochee River Corridor, with land in the A, B, C, D and E vulnerability categories. The proposed project will modify the existing Dog River Dam to allow an increase in the height of the Dog River Water Supply Reservoir. The construction area is limited to the Douglasville-Douglas County Water and Sewer Authority property, as adjacent land is not available for purchase or use as an offset.

Part 1.B.9. of the Chattahoochee Corridor Plan, allows pre-existing legal, physical, biological or hydrological conditions that prevent achievement of consistency to be considered hardships, making properties affected by these conditions eligible for an equivalent consistency finding. ARC staff has determined that the limits on available additional land constitute a hardship under the Corridor Plan.

The proposed project was then determined to be equivalent a consistent project as provided for in Section 12-5-445(a)(1)(B) of the Metropolitan River Protection Act, using an average weighted runoff coefficient test. This test compares the proposed project to a fully consistent project developed at category maximums on the property (assuming no existing development). If the average weighted runoff coefficient is the same or lower than the consistent project coefficient, the proposal is considered to be equivalent to a consistent project. This project meets the test and, while not consistent with the Plan in all respects, is equivalent to a consistent project and can be built as proposed. The test and determination are described in the memo attached to this application.

- 9. Is any of this Land within the 100-Year Floodplain of the Chattahoochee River? YES If "yes", indicate the 100-year floodplain elevation: Varies between elevation 736.3 to 735.3
 - **NOTE:** The 100-year river floodplain is defined as the natural land surface below the one hundred- (100) year flood elevations shown in the Flood Profiles of the most recent floodplain study for the Chattahoochee River approved by the United States Federal Emergency Management Agency for each Corridor jurisdiction.
 - NOTE: All river 100-year floodplain is assigned to the "E" Category; its allowable allocations can be combined with those of other "E" land in the review. Also, 100year floodplain cannot be reanalyzed and cannot accept transfers.
- 10. Is any of this land within the 500-year floodplain of the Chattahoochee River? YES If "yes", indicate the 500-year flood plain elevation: Varies between elevation 739.2 to 739.8
 - NOTE: The 500-year floodplain is defined as the natural land surface below the five hundred- (500) year flood elevations shown in the Flood Profiles of the most recent floodplain study for the Chattahoochee River approved by the United States Federal Emergency Management Agency for each Corridor jurisdiction.
 - **NOTE:** Plan Standards include a 35-foot height limit above the pre-construction grade within the 500-year floodplain (includes the 100-year floodplain). Adherence to this standard must be noted on the submitted plans (see Part 2.B.(4) of the Chattahoochee Corridor Plan). WATER SUPPUL PESPEVOR Norm. 550000
- The following is a checklist of information required to be attached as part of the 11. application. Individual items may be combined.

FOR ALL APPLICATIONS:

- ✓ Description of land in the application and any additional land in the project (attach legal description or surveyed boundaries). ATTACHMENT #1, Map #6
- ✓ Name, address, and phone number(s) of owner(s) of record of the land in the application. (Space provided on this form)
- ✓ Written consent of all owners to this application. (Space provided on this form)
- ✓ Name, address, and phone number(s) of applicant or applicant's agent. (Space provided on this form)
- ✓ Description of proposed use(s). (Space provided on this form)
- ✓ Existing vegetation plan. ATTACHMENT #1, Map #3
- ✓ Proposed grading plan. ATTACHMENT #2, SHEETS 3, 4, AND 5
- ✓ Certified as-builts of all existing land disturbance and impervious surfaces. ATTACHMENT #3
- ✓ Approved erosion control plan. ATTACHMENT #4
- \checkmark Detailed table of land-disturbing activities. (Both on this form and on the plans)

_ ✓	Plat-level plan showing (as applicable): lot boundaries; any other sub-areas; all easements
	and rights-of -way; 100- and 500-year river floodplains; vulnerability category
	boundaries; topography; any other information that will clarify the review.
	ATTACHMENT #2, SHEET 2

<u>NA</u> Documentation on adjustments, if any.

NA Cashier's check or money order (for application fee).

FOR SINGLE-STEP APPLICATIONS (NON-SUBDIVISION):

	_ Site plan. ATTACHMENT #2, SHEETS 3, 4, & 5
	LAND DISTURBANCE LIMITS SHOWN ON ALL MAPS IN
<u> </u>	Land-disturbance plan. ATTACHMENT #1 & #2. ALSO SHOWN ON EROSION CONTROL
	PLANS IN ATTACHMENT #4.
FOF	R TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATIONS ONLY:

____ Concept plan.

____ Lot-by-lot and non-lot allocation tables.

** 12. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act: (use additional sheets as necessary)

Note, the undersigned landowner of record consents to the MRPA review but is not certifying as to accuracy or completeness of the data in the MRPA Review application

Signature(s) of Owner(s) of Record

Date

Date

** 13. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act:

Signature(s) of Applicant(s) or Agent(s)

** 14. The governing authority of ______ requests review by the Atlanta Regional Commission of the above-described use under the Provisions of the Metropolitan River Protection Act.

Signature of Chief Elected Official or Official's Designee Date

- X Plat-level plan showing (as applicable): lot boundaries; any other sub-areas; all easements and rights-of -way; 100- and 500-year river floodplains; vulnerability category boundaries; topography; any other information that will clarify the review. ATTCHMENT #2, SHEET 2
- NA Documentation on adjustments, if any.
- <u>NA</u> Cashier's check or money order (for application fee).

FOR SINGLE-STEP APPLICATIONS (NON-SUBDIVISION):

- X Site plan. ATTACHMENT #2, SHFETS 3,4, & 5
- LAND DISTURBANCE LIMITS SHOWN ON ALL MAPS IN ATTACHTENTS #1 & #2, X Land-disturbance plan. ALSO SHOWN ON EROSION CONTROL PLANS IN ATTACHTENT #4,
- FOR TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATIONS ONLY: ____ Concept plan.
- _____ Lot-by-lot and non-lot allocation tables.
- 12. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act: (use additional sheets as necessary)

Note,	the	undersigned	landowner	of	record	consents	to	the	MPPA	review
			المفصلة طفاة بصاميك شماسة						++++++	THE PART

but is not certifying as to accuracy or completeness of the data in the MARA Review Application.

Signature(s) of Owner(s) of Record

- Vijay Thotakura, Preserve Life Corp CEO
- 13. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act:

Signature(s) of Applicant(s) or Agent(s)

{

Date

9/25/24

Date

14. The governing authority of ______ requests review by the Atlanta Regional Commission of the above-described use under the Provisions of the Metropolitan River Protection Act.

Signature of Chief Elected Official or Official's Designee Date

- ✓ Plat-level plan showing (as applicable): lot boundaries; any other sub-areas; all easements and rights-of -way; 100- and 500-year river floodplains; vulnerability category boundaries; topography; any other information that will clarify the review. ATTACHMENT #2, SHEET 2
- NA Documentation on adjustments, if any.
- NA Cashier's check or money order (for application fee).

FOR SINGLE-STEP APPLICATIONS (NON-SUBDIVISION):

_ v	_ Site plan. ATTACHMENT #2, SHEETS 3, 4, & 5
	LAND DISTURBANCE LIMITS SHOWN ON ALL MAPS IN
✓	Land-disturbance plan. ATTACHMENT #1 & #2. ALSO SHOWN ON EROSION CONTROL
-	PLANS IN ATTACHMENT #4.
FOI	R TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATIONS ONLY:
	_ Concept plan.

Lot-by-lot and non-lot allocation tables.

12. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act: (use additional sheets as

necessary) Note, the undersigned landowner of record consents to the MRPA review but is not certifying as to accuracy or completeness of the data in the MRPA Review application

Laura Richards

Signature(s) of Owner(s) of Record

13. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act:

Signature(s) of Applicant(s) or Agent(s)

14. The governing authority of _______ requests review by the Atlanta Regional Commission of the above-described use under the Provisions of the Metropolitan River Protection Act.

Signature of Chief Elected Official or Official's Designee Date

Date

Date

9/10/24

- ✓ Plat-level plan showing (as applicable): lot boundaries; any other sub-areas; all easements and rights-of -way; 100- and 500-year river floodplains; vulnerability category boundaries; topography; any other information that will clarify the review. ATTACHMENT #2, SHEET 2
- NA Documentation on adjustments, if any.
- NA Cashier's check or money order (for application fee).

FOR SINGLE-STEP APPLICATIONS (NON-SUBDIVISION):

- _ ✓ Site plan. ATTACHMENT #2, SHEETS 3, 4, & 5 LAND DISTURBANCE LIMITS SHOWN ON ALL MAPS IN Land-disturbance plan. ATTACHMENT #1 & #2. ALSO SHOWN ON EROSION CONTROL PLANS IN ATTACHMENT #4. FOR TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATIONS ONLY:
- Concept plan.

Lot-by-lot and non-lot allocation tables.

12. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act: (use additional sheets as necessary)

hearene GILBERT B. Shearouse D9/30

Signature(s) of Owner(s) of Record

13. I (we), the undersigned, authorize and request review of this application for a certificate under the provisions of the Metropolitan River Protection Act:

rene ilbert B. Shearouse, Signature(s) of Applicant(s) or Agent(s) County Douglas 14. The governing authority of requests review by the Atlanta Regional Commission of the above-described use under the Provisions of the Metropolitan River Protection Act. 10/28/24 Signature of Chief Elected Official or Official's Designee

Addendum to Application

Jim Santo, ARC

11/18/24

Dog River Reservoir Expansion Equivalency Explanation and Calculations

The proposed project property in question has a total area of 338.43 acres, with 100.34 acres in the Chattahoochee River Corridor. The Corridor portion of the property has land in the A, B, C, D and E vulnerability categories. The proposed project area is limited to the land owned by the Douglasville-Douglas County Water and Sewer Authority DDCWSA) with the main work area abutting the edge of the Corridor. The adjacent land in the Corridor is privately owned and is not available for purchase or for use as an offset to the project. Land outside the Corridor or not adjacent to the proposed project property cannot be used to offset the proposed development under MRPA and the Corridor Plan. As a result, the land disturbance required for this project exceeds the maximums allowed in all categories on the property, making the project inconsistent with the Corridor Plan.

Under the Chattahoochee Corridor Plan, pre-existing legal, physical, biological or hydrological conditions that prevent achievement of consistency are considered hardships, making properties affected by these conditions eligible for an equivalent consistency finding.

It is ARC staff opinion that the lack of available offset land for this project constitutes such a hardship, making the property eligible for equivalent consistency. We use an average weighted runoff coefficient test to determine equivalent consistency.

Average Weighted Runoff Coefficient Test

The average weighted runoff coefficient test compares the proposed project to a hypothetical maximum consistent project, which assumes that the condition causing the hardship does not exist. The test handles disturbance and undisturbed areas differently than in a review. Undisturbed areas are identified as "natural", and the non-impervious portion of the disturbed area (impervious is always land disturbance as well) is separated out and called "landscaped". Impervious stays the same. The calculations also average out the areas and percentages of the natural, landscaped and impervious land across the entire site, combining the totals of each in all categories. The percentages are multiplied by a runoff coefficient (0.30 for natural, 0.35 for landscaped and 0.95 for impervious). The results are then added, which is the average weighted runoff coefficient for a maximum consistent project. The test is run again for the proposed project. If the proposed average weighted runoff coefficient is the same or lower than the maximum consistent project, then it is considered to be equivalent to a consistent project.

Addendum Page Two

Using the category areas provided by the applicant, the allowed maximums for each category for the maximum consistent project were calculated:

Category	Total Area	Land	Impervious
		Disturbance	Surface
А	1.44 Ac	1.296 Ac (90%)	1.08 Ac (75%)
В	0.11 Ac	0.088 Ac (80%)	0.066 Ac (60%)
С	41.35 Ac	28.945 Ac (70%)	18.608 Ac (45%)
D	25.05 Ac	12.525 Ac (50%)	7.515 Ac (30%)
E	32.39 Ac	9.717 Ac (30%)	4.858 Ac (15%)
TOTALS:	100.34 Ac	52.571 Ac	32.127 Ac

Using the totals from this table, the areas used in the runoff coefficient test were calculated:

100.34 Ac (total area) – 52.571 Ac (disturbed area) = 47.769 Ac (natural/undisturbed)

52.571 Ac (disturbed) - 32.127 Ac (impervious area) = 20.444 Ac (landscaped)

32.127 Ac (impervious)

Next, the percentage of the total site in each area was calculated, expressed as a decimal. Then, each percentage was multiplied by the appropriate runoff coefficient:

Natural:	$47.769 / 100.34 = 0.4761 \times 0.30 =$	= 0.1428		
Landscaped:	$20.444 / 100.34 = 0.2037 \times 0.35 =$	= 0.0713		
Impervious:	$32.127 / 100.34 = 0.3202 \times 0.95 =$	= 0.3042		
Average weighted runoff coefficient: 0.5183				

Using the numbers provided by the applicant, the process was repeated for the proposed project:

Proposed	Project:
-----------------	----------

Category	Total Area	Land	Impervious	
		Disturbance	Surface	
А	1.44 Ac	1.44 Ac (100%)	0.41 Ac (28.13%)	
В	0.11 Ac	0.11 Ac (100%)	0 Ac (0%)	
С	41.35 Ac	41.35 Ac (100%)	12.91 Ac (31.22%)	
D	25.05 Ac	25.05 Ac (100%)	4.15 Ac (16.57%)	
E	32.39 Ac	31.09 Ac (95.98%)	8.69 Ac (27.95%)	
TOTALS:	100.34 Ac	99.04 Ac	26.16 Ac	

Addendum Page Three

Again, using the totals from the proposed project table, the areas for this portion of the runoff coefficient test were calculated:

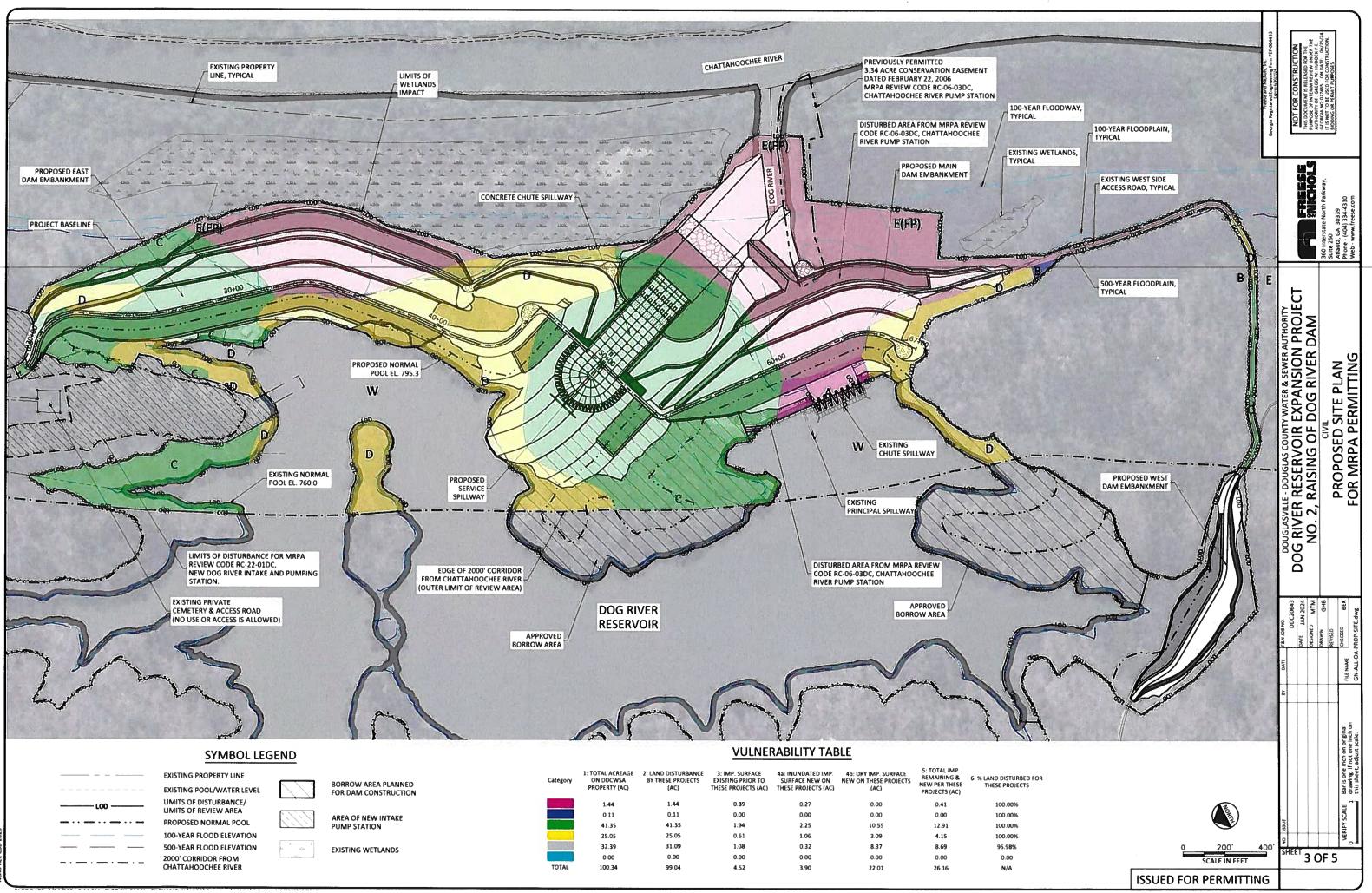
100.34 Ac (total area) – 99.04 Ac (disturbed area) = 1.3 Ac (natural/undisturbed)

99.04 Ac (disturbed) - 26.16 Ac (impervious area) = 72.88 Ac (landscaped)

26.16 Ac (impervious)

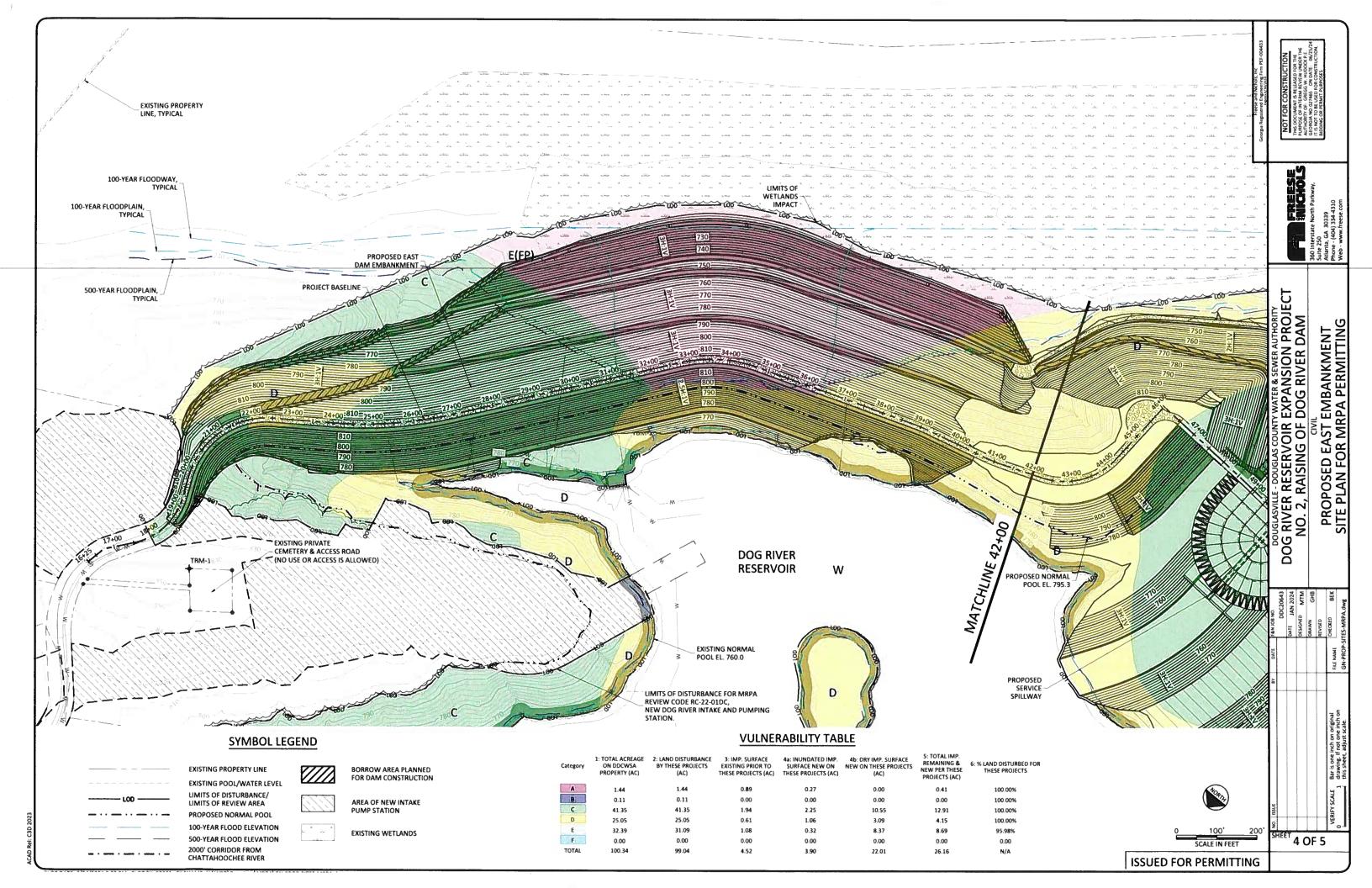
Next, the percentage of the total site in each area was again calculated, expressed as a decimal. Then, each percentage was multiplied by the appropriate runoff coefficient:

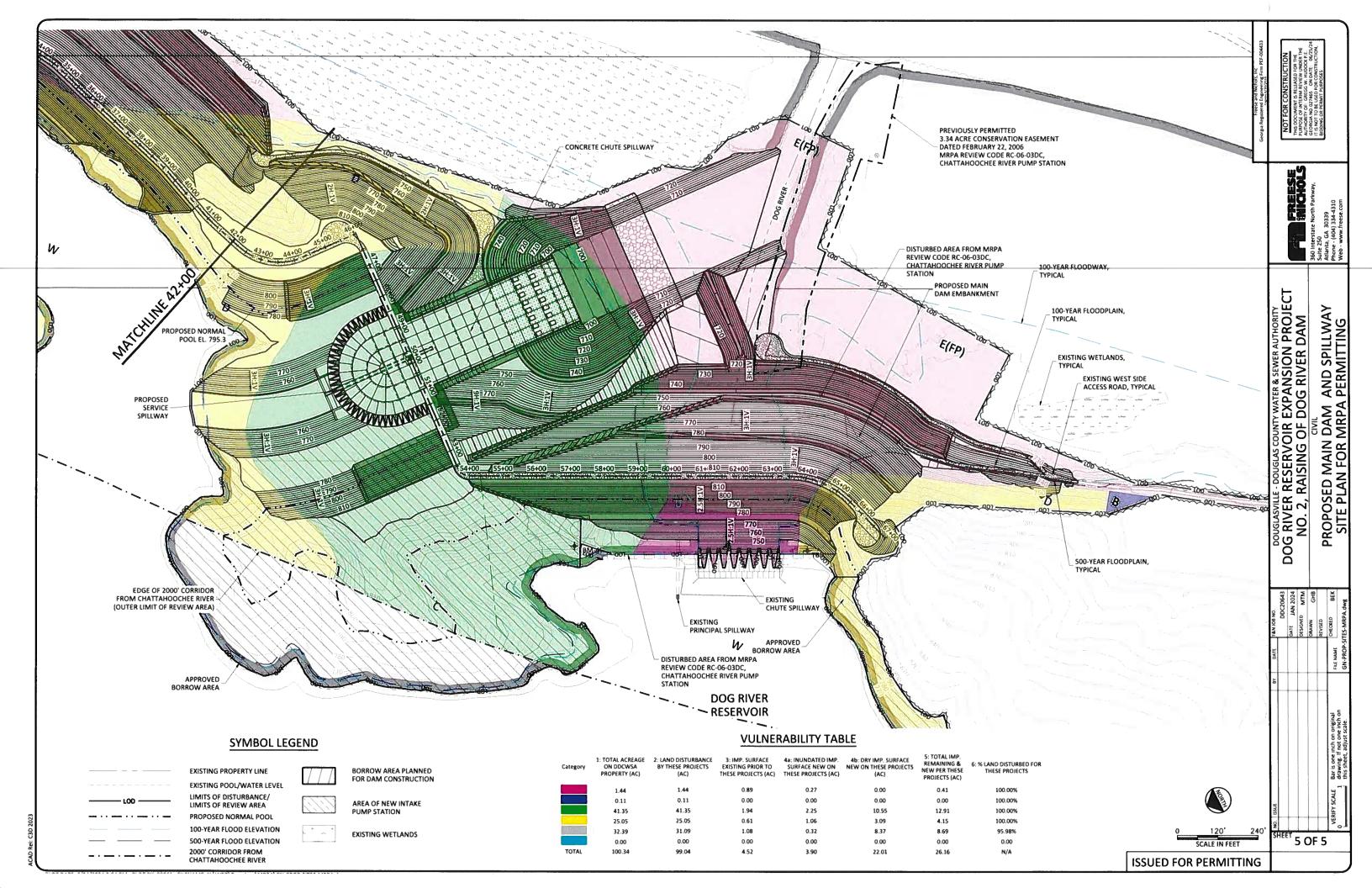
Natural:	$1.3 / 100.34 = 0.013 \times 0.30 =$	0.0039		
Landscaped:	$72.88 / 100.34 = 0.7263 \times 0.35 =$	0.2542		
Impervious:	$26.16 / 100.34 = 0.2607 \times 0.95 =$	0.2477		
Average weighted runoff coefficient:0.5058				

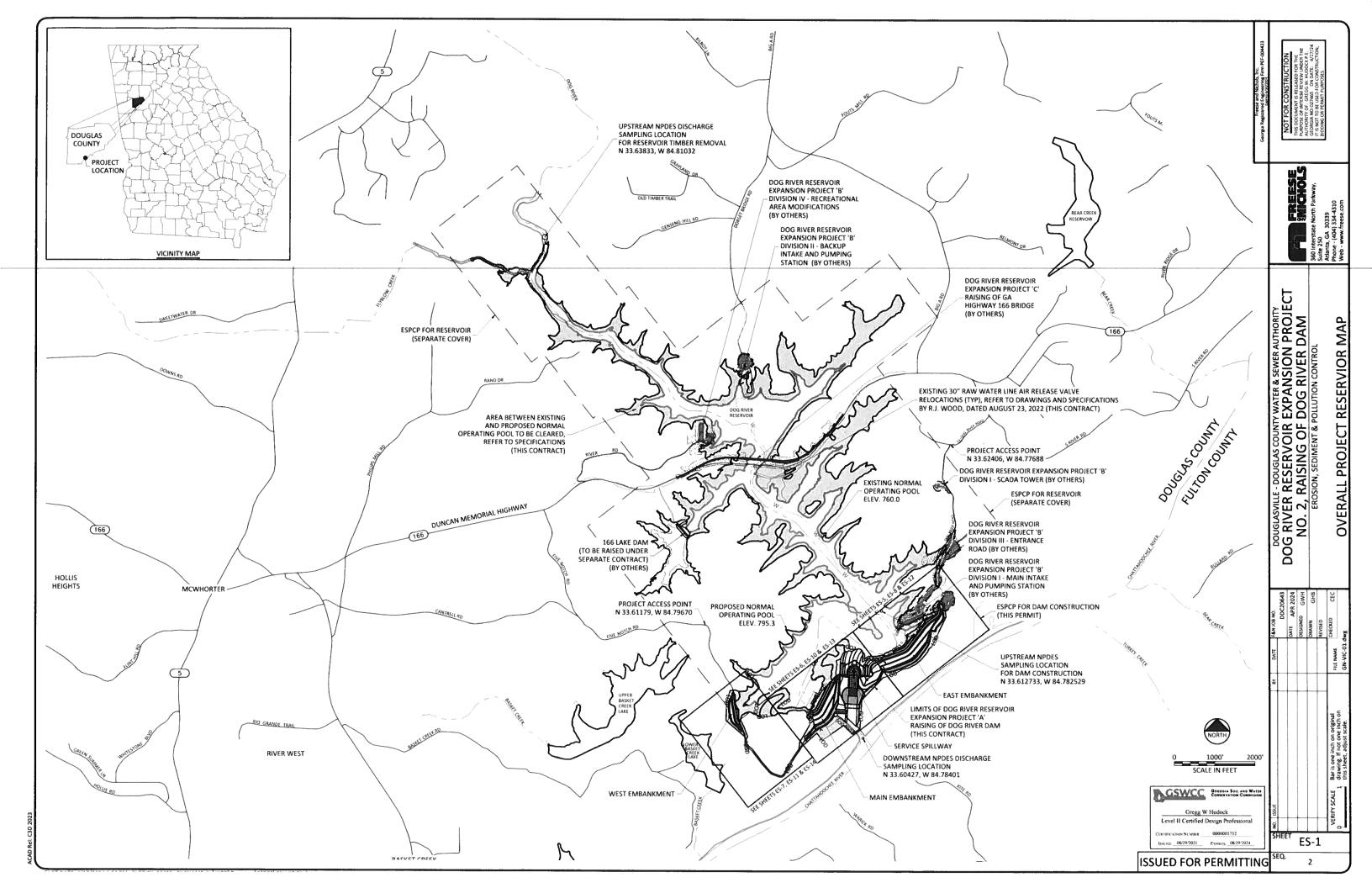


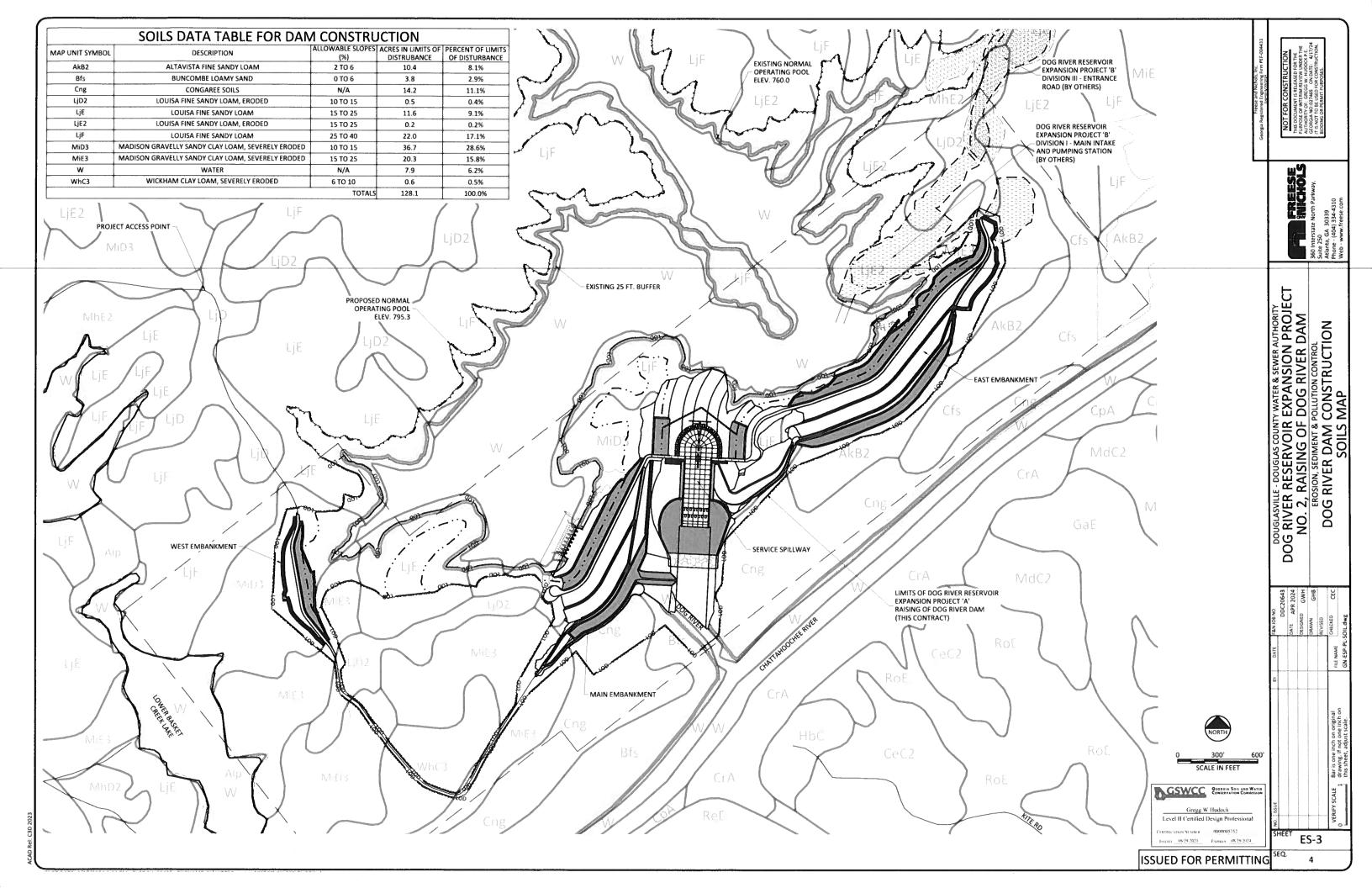
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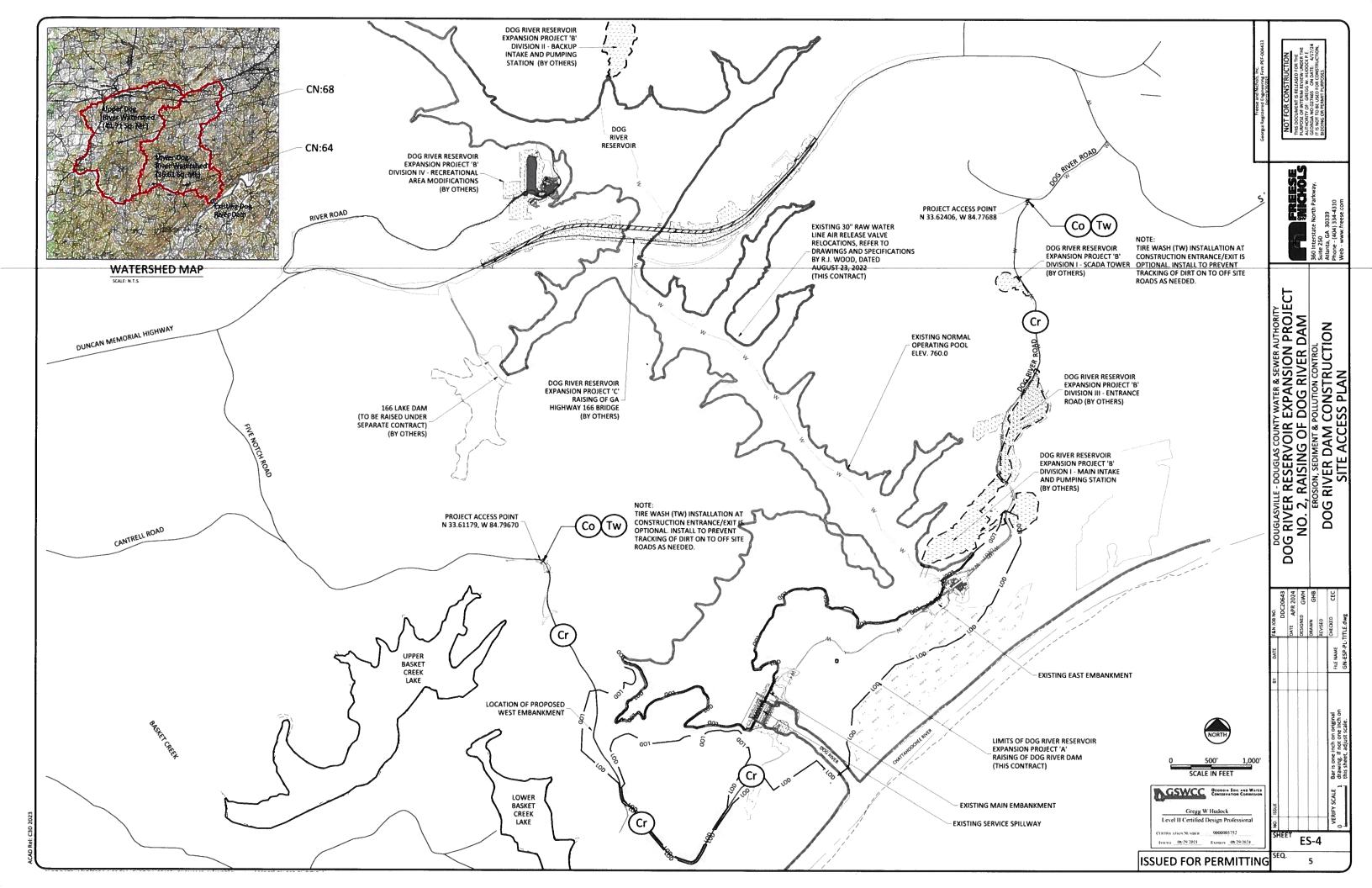
Category	1: TOTAL ACREAGE ON DDCWSA PROPERTY (AC)	2: LAND DISTURBANCE BY THESE PROJECTS (AC)	3: IMP. SURFACE EXISTING PRIOR TO THESE PROJECTS (AC)	4a: INUNDATED IMP. SURFACE NEW ON THESE PROJECTS (AC)	4b: DRY IMP. SURFACE NEW ON THESE PROJECTS (AC)	5: TOTAL IMP. REMAINING & NEW PER THESE PROJECTS (AC)	6: % LAND DISTURBE THESE PROJECT
	1.44	1.44	0.89	0.27	0.00	0.41	100.00%
	0.11	0.11	0.00	0.00	0.00	0.00	100.00%
	41.35	41.35	1.94	2.25	10.55	12.91	100.00%
	25.05	25.05	0.61	1.06	3.09	4.15	100.00%
A STATISTICS	32.39	31.09	1.08	0.32	8.37	8.69	95.98%
E .	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	100.34	99.04	4.52	3.90	22.01	26.16	N/A

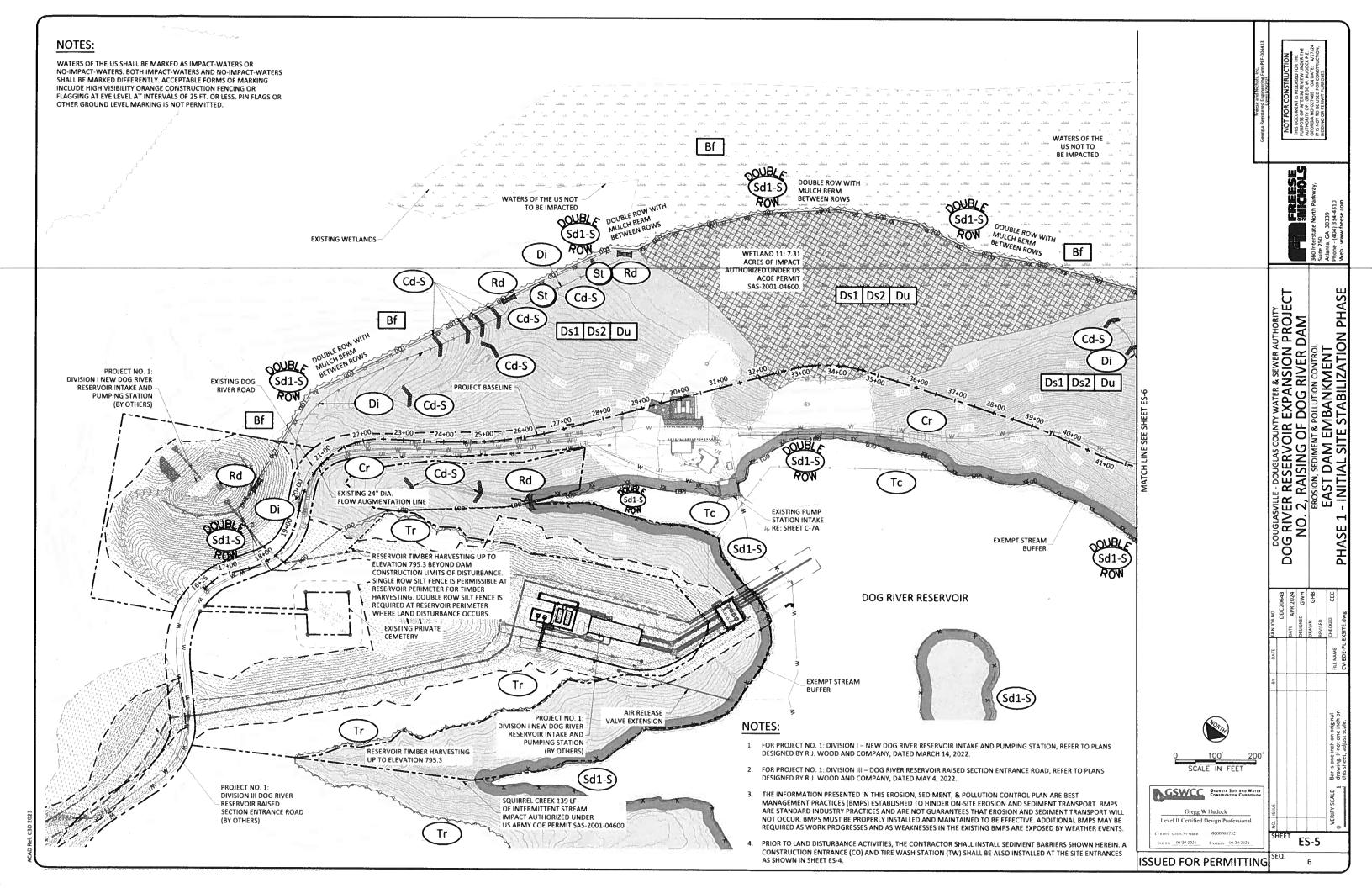


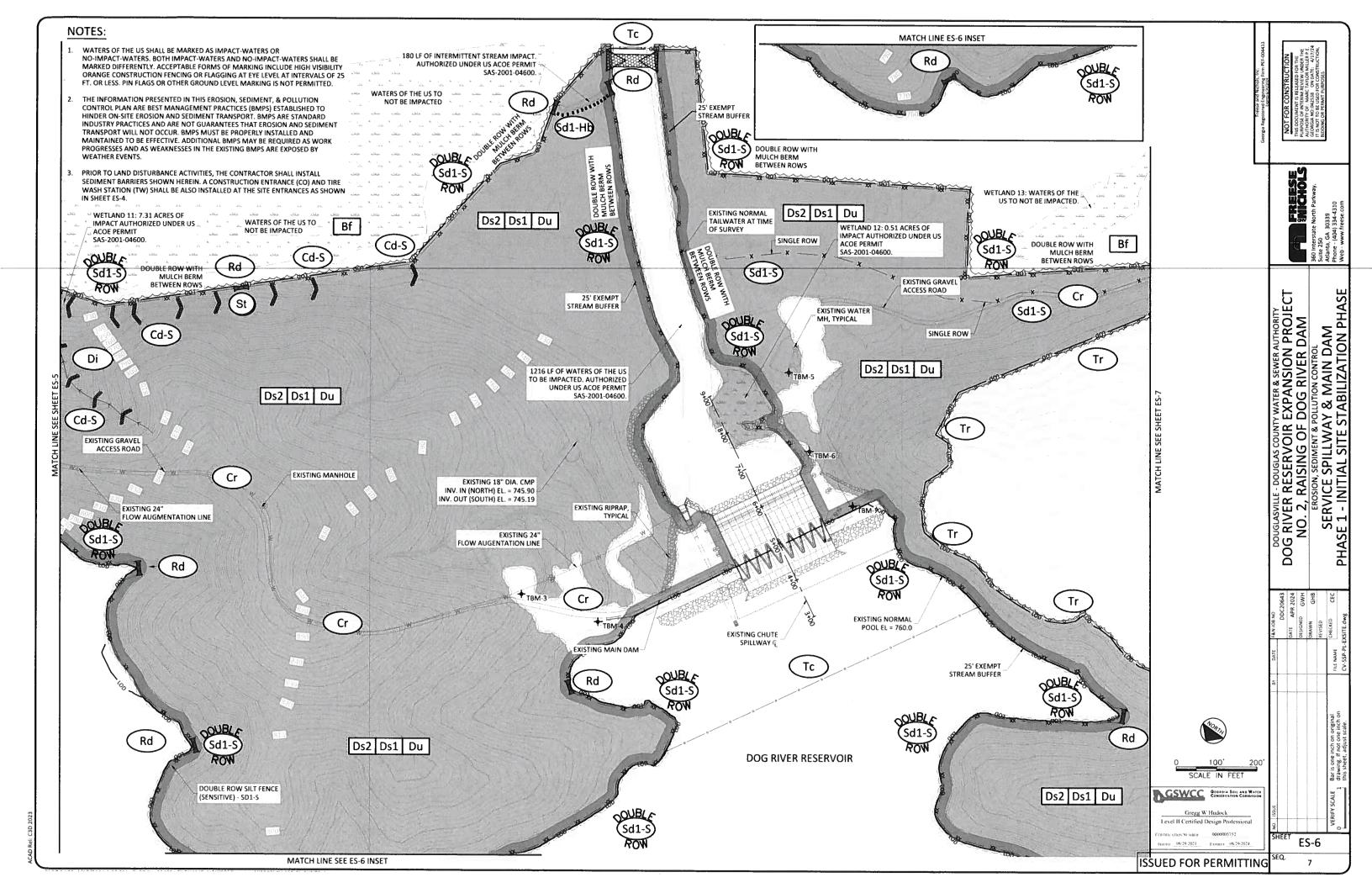












- NO-IMPACT-WATERS. BOTH IMPACT-WATERS AND NO-IMPACT-WATERS SHALL BE MARKED DIFFERENTLY. ACCEPTABLE FORMS OF MARKING INCLUDE HIGH VISIBILITY ORANGE CONSTRUCTION FENCING OR FLAGGING AT EYE LEVEL AT
- POLLUTION CONTROL PLAN ARE BEST MANAGEMENT PRACTICES (BMPS) ESTABLISHED TO HINDER ON-SITE EROSION AND SEDIMENT TRANSPORT. BMPS ARE STANDARD INDUSTRY PRACTICES AND ARE NOT GUARANTEES THAT EROSION AND SEDIMENT TRANSPORT WILL NOT OCCUR. BMPS MUST BE PROPERLY INSTALLED AND MAINTAINED TO BE EFFECTIVE. ADDITIONAL BMPS MAY BE

