

REGIONAL REVIEW NOTIFICATION

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

DATE: DECEMBER 2, 2024

TO: Chairwoman Romona Jackson Jones, Douglas County Commission **ATTN TO**: Alison Duncan, Planning and Zoning Manager, Douglas County

FROM: Mike Alexander, COO, Atlanta Regional Commission

The Atlanta Regional Commission (ARC) has received the following proposal and is initiating a Metropolitan River Protection Act regional review to seek comments from potentially impacted jurisdictions and agencies. The ARC requests your comments related to the proposal.

Name of Proposal: Dog River Dam and Reservoir Construction

MRPA Code: RC-24-03DC

<u>Description:</u> A regional MRPA review of a proposal to modify the existing Dog River main and east dams and construct a new spillway in order to increase the Dog River Reservoir capacity. The project is located on a 338-acre site on Dog River Road of which 100 acres is located within the Chattahoochee River Corridor. While the total disturbed area exceeds allowed limits, the site qualifies for a determination of equivalent consistency due to the inability of the applicant to acquire the privately-owned adjacent land within the Corridor that would be needed to offset the percentage of disturbed area. Through an evaluation of equivalent consistency, the project is considered to be equivalent to a project that is consistent with the Chattahoochee River Corridor Plan.

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

Submitting Local Government: Douglas County

Date Opened: December 2, 2024

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES ARE RECEIVING NOTICE OF THIS REVIEW:

ATLANTA REGIONAL COMMISSION
NATIONAL PARK SERVICE
CITY OF DOUGLASVILLE
COWETA COUNTY

GEORGIA DEPARTMENT OF NATURAL RESOURCE
GEORGIA CONSERVANCY
CITY OF CHATTAHOOCHEE HILLS

CHATTAHOOCHEE RIVERKEEPER
DOUGLAS COUNTY
CARROLL COUNTY

Please submit comments to dshockey@atlantaregional.org. For questions, please contact Donald Shockey at dshockey@atlantaregional.org or (470) 378-1531. If no comments are received by Thursday December 12, 2024, ARC will assume that your agency has no input on the subject plan. For more information visit the ARC review website at http://www.atlantaregional.org/land-use/planreviews.

Review materials are attached.

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 G	Government: Douglas County,	Georgia		
2.	Owner(s) of Rec	ord of Property to be Reviev	ved•		
	Name(s):Laura Richards, Preserve Life Corp., & Douglasville-Douglas 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		A - (678)-631-1515	
	Other N	umbers:			
3.	Applicant(s) or	Annligant's Agent(s).			_
Э.		Applicant's Agent(s): uglasville-Douglas County Watel	r and Sawar Authority: Jos	oon Wormouth	
		dress: P.O. Box 1157	and Sewer Authority. Ja	Soft Warmouth	
	City:Douglas		StatasCapraia	7in.00400	
	· —	one Numbers (w/Area Code)	State:Georgia	Zip: <u>30133</u>	
		Phone: (678)-689-8466	• Fax:(678)-63	1_1515	
		umbers: DDCWSA Office (770)		11-1010	
	Other 14	unibers.	-040-7017		
4.	Proposed Land	or Water Use:			
		velopment:Dog River Reservoi	r - Second Raise of Dog I	River Dam	
	Description	of Proposed Use: Modification	of the existing Dog River	Main and East Dam &	
		of a new spillway to provide a rel			
5.	Property Descrip	otion (Attach Legal Descrip	tion and Vicinity Map):	
	Land Lot(s)	, District, Section, County:La	and Lots 15, 18, and 19, 3	Brd District, 5th Section, Douglas Count	ť
	LATITUDE: 3	3 36 23.46"N LONGITUDE: 84 4	7 15.54"W		
	Subdivision	, Lot, Block, Street and Add	ress, Distance to Near	est Intersection:	
	Size of Days	elopment (Use as Applicable)			
	Acres:	Inside Corridor:100.34 Ac			
	Acies.	Outside Corridor: 338.43			
		Total: 438.77 Acres	10100		
	Lots:				
	Lots:	Inside Corridor:			
		Total:			
	Units:				
	Units:	Outside Corridor:			
		Outside Corridor:			
	Oth on Cine I	Total:	W: J4L - CE A		
	Other Size I	Descriptor (i.e., Length and	width of Easement):		
	Inside Corridor: Outside Corridor:				
		Outside Corridor:			
		Total:			

 Related Chattahoochee Corridor Development: A. Does the total development include additional land in the Chattahoochee Corridor that is not part of this application?						
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: 						
Vulnerabili Category	•	Total Acreage (or Sq. Footage) Land Disturbance	Total Acreage (or Sq. Footage) Imperv. Surface	Percent Percent Land Imperv. <u>Disturb.</u> <u>Surf.</u> (Maximums Shown In Parentheses)		
A _	1.44 AC	1.44 AC	0.41 AC	(90) <u>100.00</u> (75) <u>28.13</u>		
B 0.11 AC 0.11		0.11 AC	0	(80) 100.00 (60) 0		
C _	41.35 AC	41.35 AC	12.91 AC	(70) <u>100.00</u> (45) <u>31.22</u>		
D _	25.05 AC	25.05 AC	4.15 AC	(50) 100.00 (30) 16.57		
E _	32.39 AC	31.09 AC	8.69 AC	(30) <u>95.98</u> (15) <u>27.95</u>		
F _	0	0	0	(10) 0 (2) 0		
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 An). WATER SUPPLY PERFEVOR ROOM.

FROM NEWS LIMIT PAR PART Z. B(4) OF PURING THE PART Z. B(4) OF PURIN Chattahoochee Corridor Plan). WATER SUPPLY PERSON ROOM. GOLDON The following is a checklist of information required to be attached as part of the 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 Detailed table of land-disturbing activities. (Both on this form and on the plans)

	Plat-level plan showing (as applicable): lot boundaries; any other and rights-of-way; 100- and 500-year river floodplains; vulnerab boundaries; topography; any other information that will clarify the ATTACHMENT #2, SHEET 2	ility category	sements
NA	Documentation on adjustments, if any.		
NA	Cashier's check or money order (for application fee).		
	R SINGLE-STEP APPLICATIONS (NON-SUBDIVISION):		
	Site plan. ATTACHMENT #2, SHEETS 3, 4, & 5 LAND DISTURBANCE LIMITS SHOWN		
_	Land-disturbance plan. ATTACHMENT #1 & #2. ALSO SHOWN PLANS IN ATTACHMENT #4.	ON EROSION	CONTRO
FOF	R TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATIONS	S ONLY:	
	Concept plan.		
	Lot-by-lot and non-lot allocation tables.		
** 12.	I (we), the undersigned, authorize and request review of this appli under the provisions of the Metropolitan River Protection Act: (unecessary) Note, the undersigned landowner of record consents to the MRPA review be accuracy or completeness of the data in the MRPA Review application	se additional sh	eets as
	Signature(s) of Owner(s) of Record	Date	
** 13.	I (we), the undersigned, authorize and request review of this appli under the provisions of the Metropolitan River Protection Act:	cation for a cert	ificate -
	Signature(s) of Applicant(s) or Agent(s)	Date	-
** 14.	The governing authority of	d use under the	requests
	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. ATTCHEENT #2, SEEET 2						
<u>NA</u>	NA Documentation on adjustments, if any.					
NA	_ Cashier's check or money order (for application fee).					
<u>X</u>	R SINGLE-STEP APPLICATIONS (NON-SUBDIVISION): Site plan. ATTACHMENT #2, SHFETS 3,4, & 5 LAND DISTURBANCE LIMITS SHOWN ON ALL MAPS Land-disturbance plan. ALSO SHOWN ON EROSION CONTROL					
FOI	R TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATION Concept plan.	ONS ONLY:				
12.	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 but is not certifying as to accuracy or completenes MEPA Review Application.					
	The state of the s	9/25/24				
13.	Signature(s) of Owner(s) of Record Vijay Thotakura, Preserve Life Corp CEO I (we), the undersigned, authorize and request review of this apunder the provisions of the Metropolitan River Protection Act:	Date pplication for a cert	tificate			
	Signature(s) of Applicant(s) or Agent(s)	Date	-			
14.	The governing authority of review by the Atlanta Regional Commission of the above-descriptions of the Metropolitan River Protection Act.		requests			
ě	Signature of Chief Elected Official or Official's Designee	Date	_			

	Plat-level plan showing (as applicable): lot boundaries; any other and rights-of-way; 100- and 500-year river floodplains; vulners boundaries; topography; any other information that will clarify ATTACHMENT #2, SHEET 2	ability category	sements
<u>NA</u>	Documentation on adjustments, if any.		
<u>NA</u>	Cashier's check or money order (for application fee).		
	R SINGLE-STEP APPLICATIONS (NON-SUBDIVISION):		
<u>✓</u>	Site plan. ATTACHMENT #2, SHEETS 3, 4, & 5 LAND DISTURBANCE LIMITS SHOV Land-disturbance plan. ATTACHMENT #1 & #2. ALSO SHOV PLANS IN ATTACHMENT #4.	VN ON ALL MAPS VN ON EROSION	S IN I CONTROL
FOF	R TWO-STEP SINGLE-FAMILY SUBDIVISION APPLICATIO	NS ONLY:	
	Concept plan.		
	Lot-by-lot and non-lot allocation tables.		
12.	I (we), the undersigned, authorize and request review of this appunder the provisions of the Metropolitan River Protection Act:	•	
	necessary) Note, the undersigned landowner of record consents to the MRPA review accuracy or completeness of the data in the MRPA Review application	w but is not certifying	g as to
	Laura Richards	9/10/24	
	Signature(s) of Owner(s) of Record	Date	
13.	I (we), the undersigned, authorize and request review of this apunder the provisions of the Metropolitan River Protection Act:	plication for a cert	ificate
		Deta	-
	Signature(s) of Applicant(s) or Agent(s)	Date	
14.	The governing authority of	had was under the	requests
	review by the Atlanta Regional Commission of the above-descri Provisions of the Metropolitan River Protection Act.	vea use under the	
	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				
<u>NA</u>	Documentation on adjustments, if any.				
	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) Mulb Menune Globert B. Sheacarse				
	GLBERT B. Shearaise				
	09/30/2024				
	Signature(s) of Owner(s) of Record 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:				
	Albert B. Sheware				
	Gilbert B. Shearouse				
	69/30/2024				
	Signature(s) of Applicant(s) or Agent(s) Date				
14.	The governing authority of Douglas Courty, GA requests				
24.	review by the Atlanta Regional Commission of the above-described use under the				
	Provisions of the Metropolitan River Protection Act.				
	alluch 10/28/24				
	Signature of Chief Elected Official or Official's Designee Date				

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:

Maximum Consistent Project:

Category	Total Area	Land	Impervious	
		Disturbance	Surface	
A	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	
<u> </u>		Disturbance	Surface	
Α	1.44 Ac	1.44 Ac (100%)	0.41 Ac (28.13%)	
В	0.11 Ac	0.11 Ac (100%)	0 Ac (0%)	
C	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%)	
<u>E</u>	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:

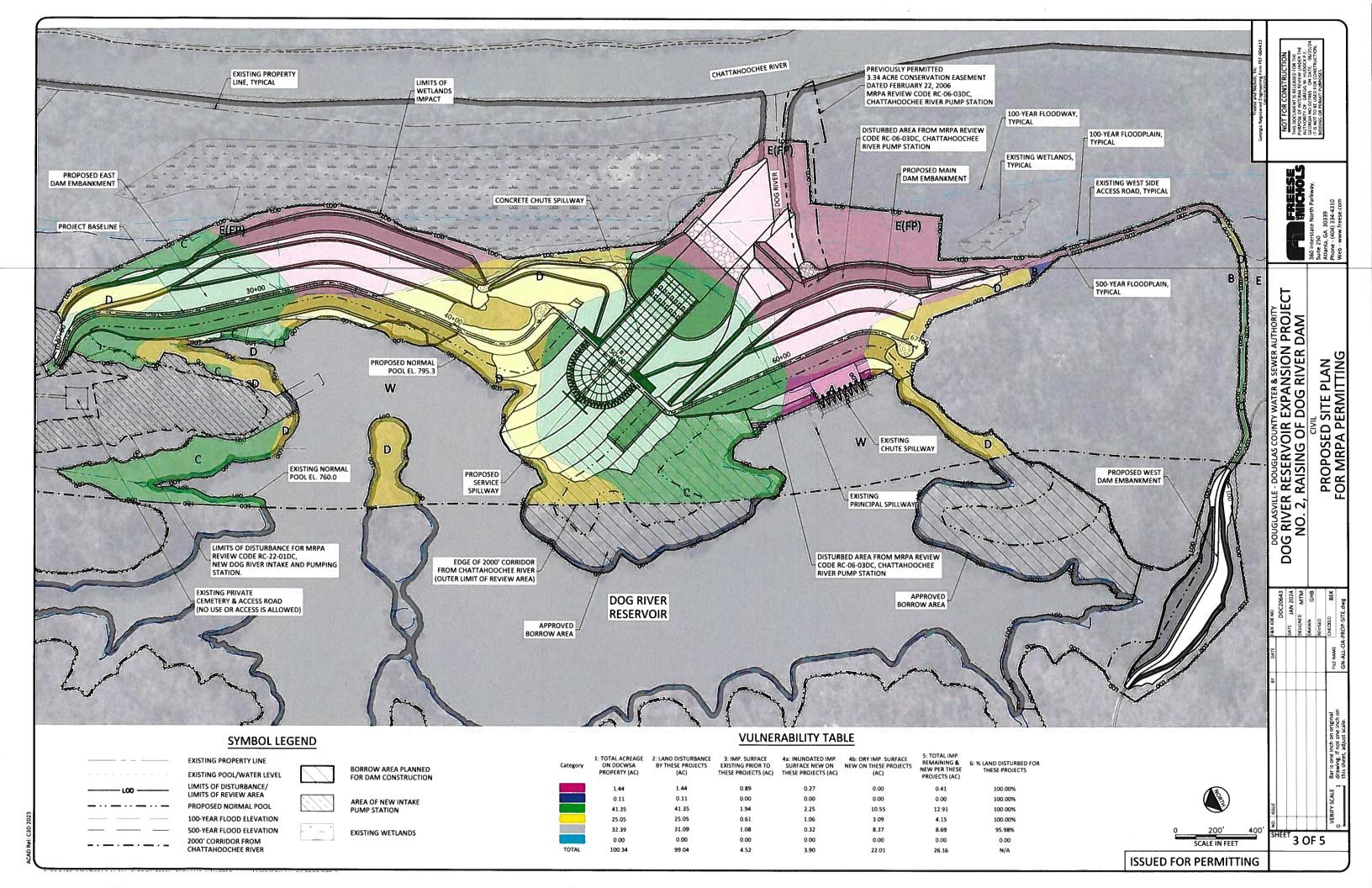
 $72.88 / 100.34 = 0.7263 \times 0.35 = 0.2542$

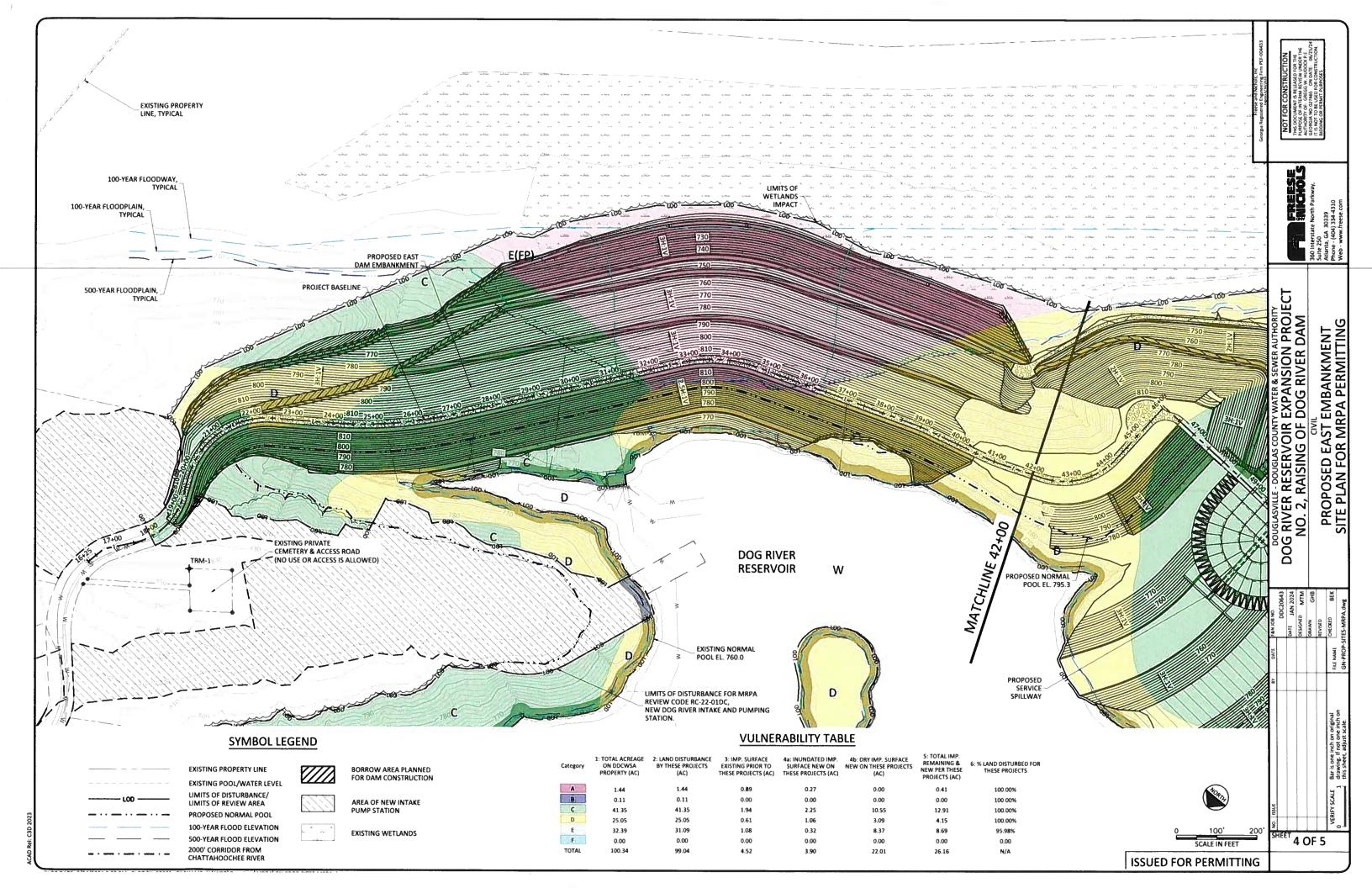
Impervious:

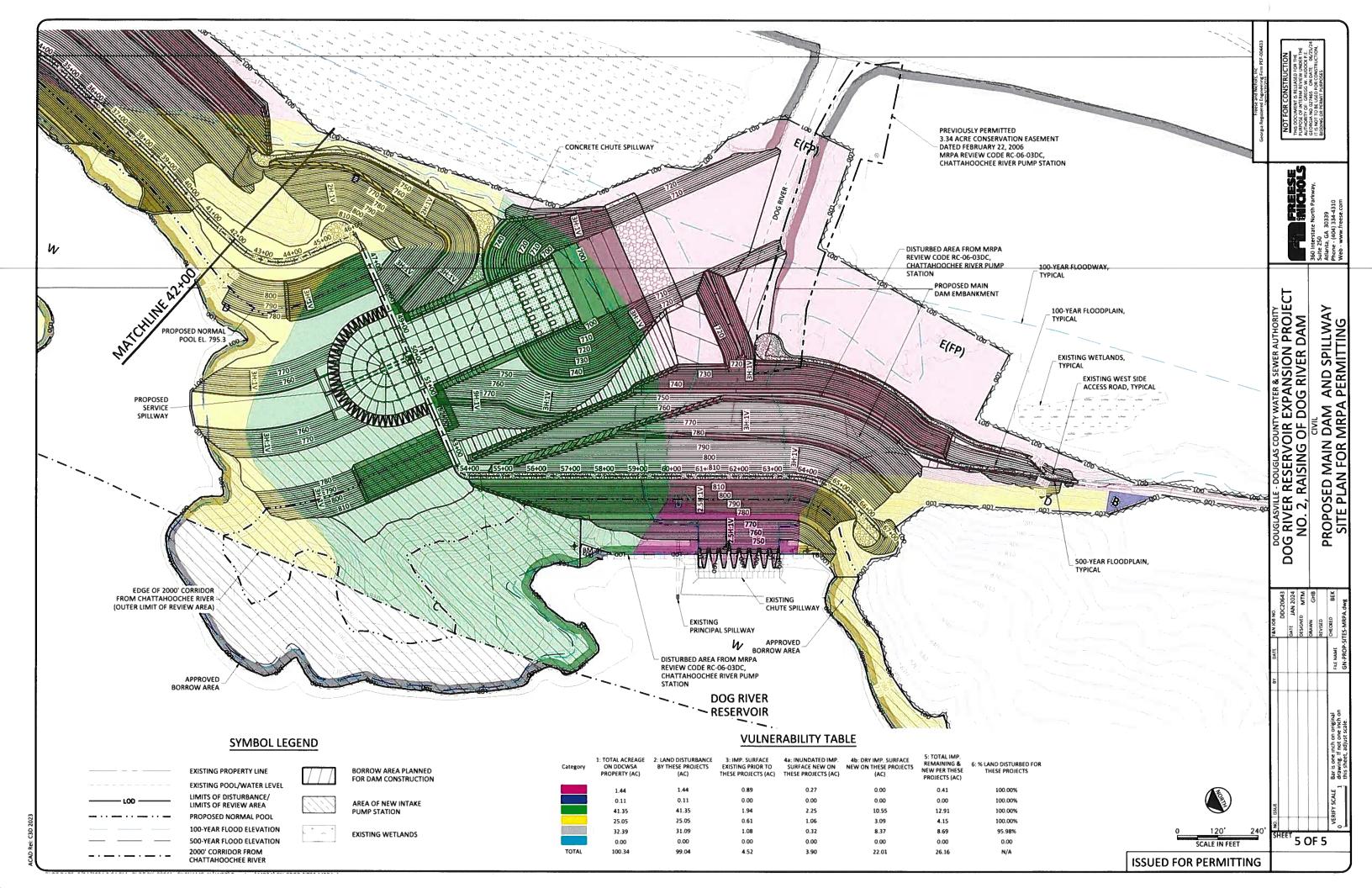
 $26.16 / 100.34 = 0.2607 \times 0.95 = 0.2477$

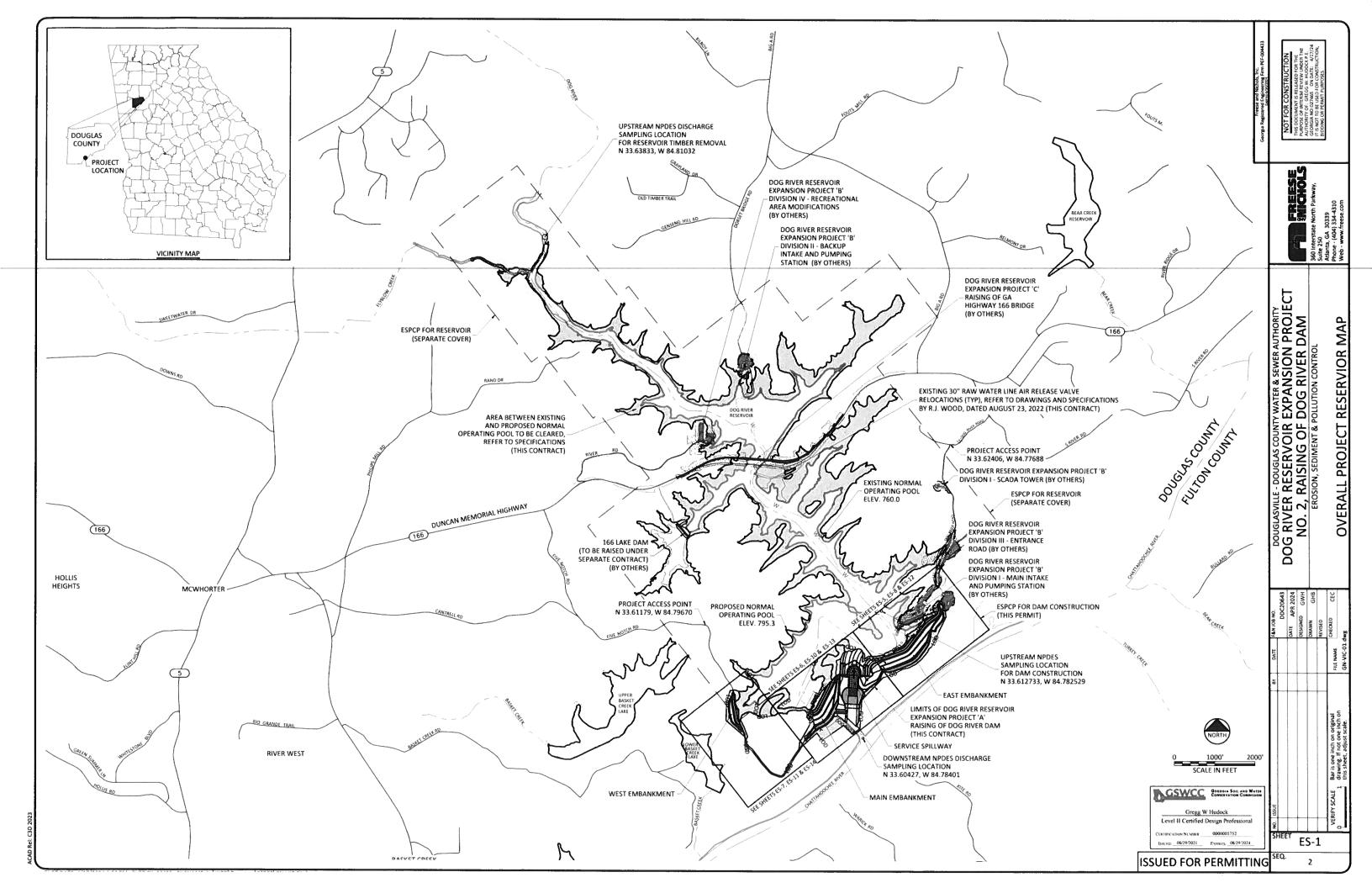
Average weighted runoff coefficient:

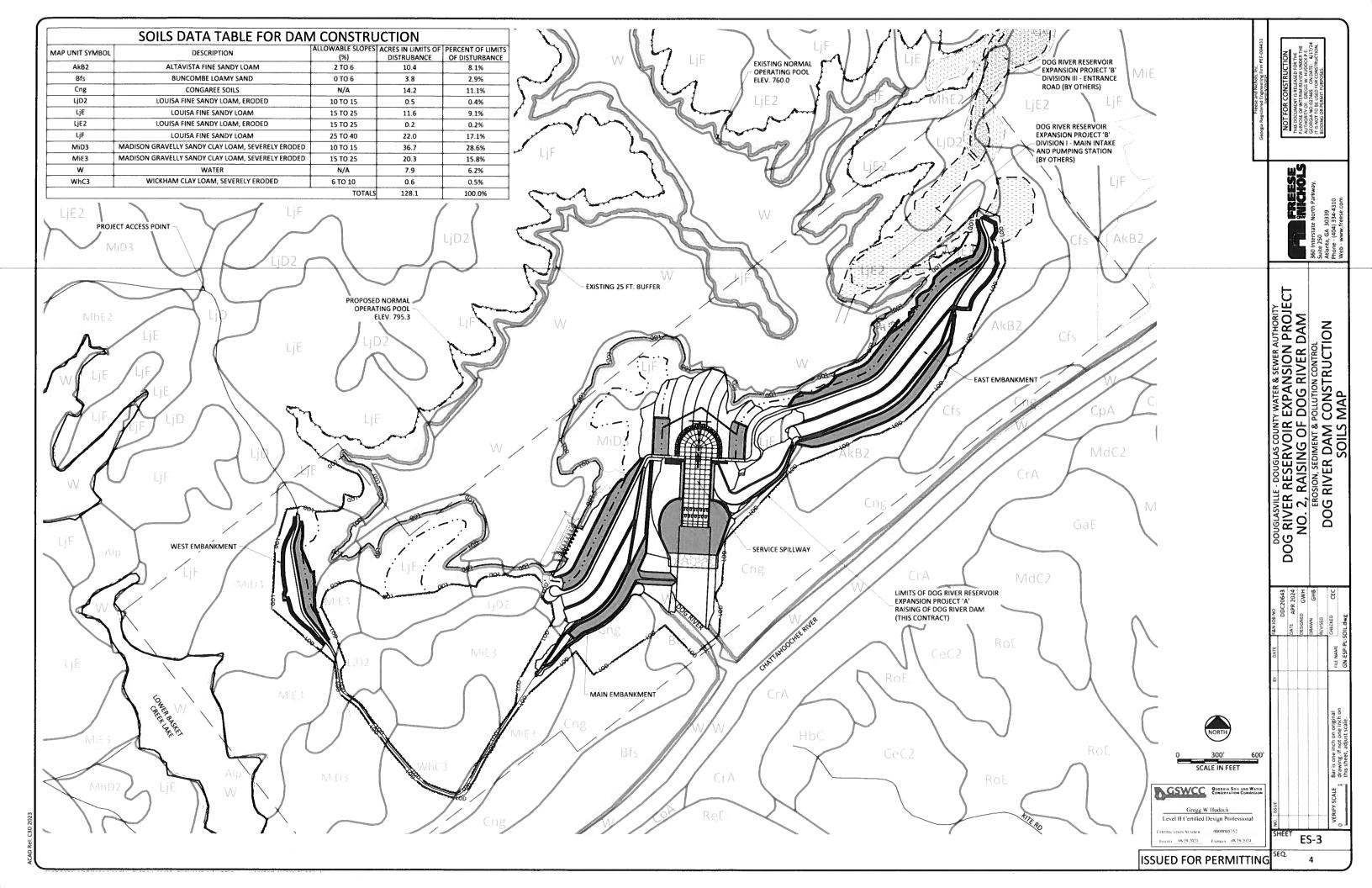
0.5058

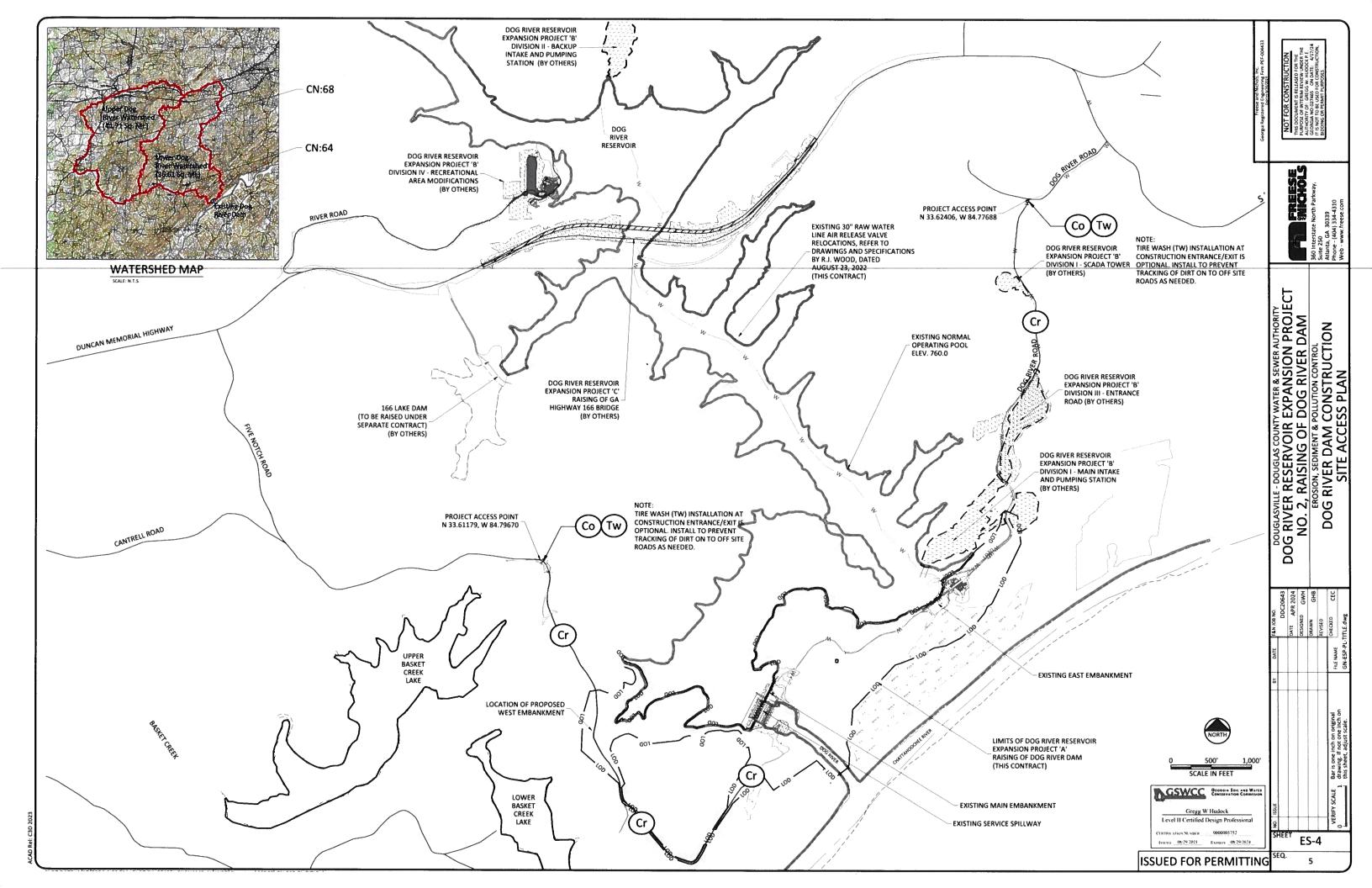


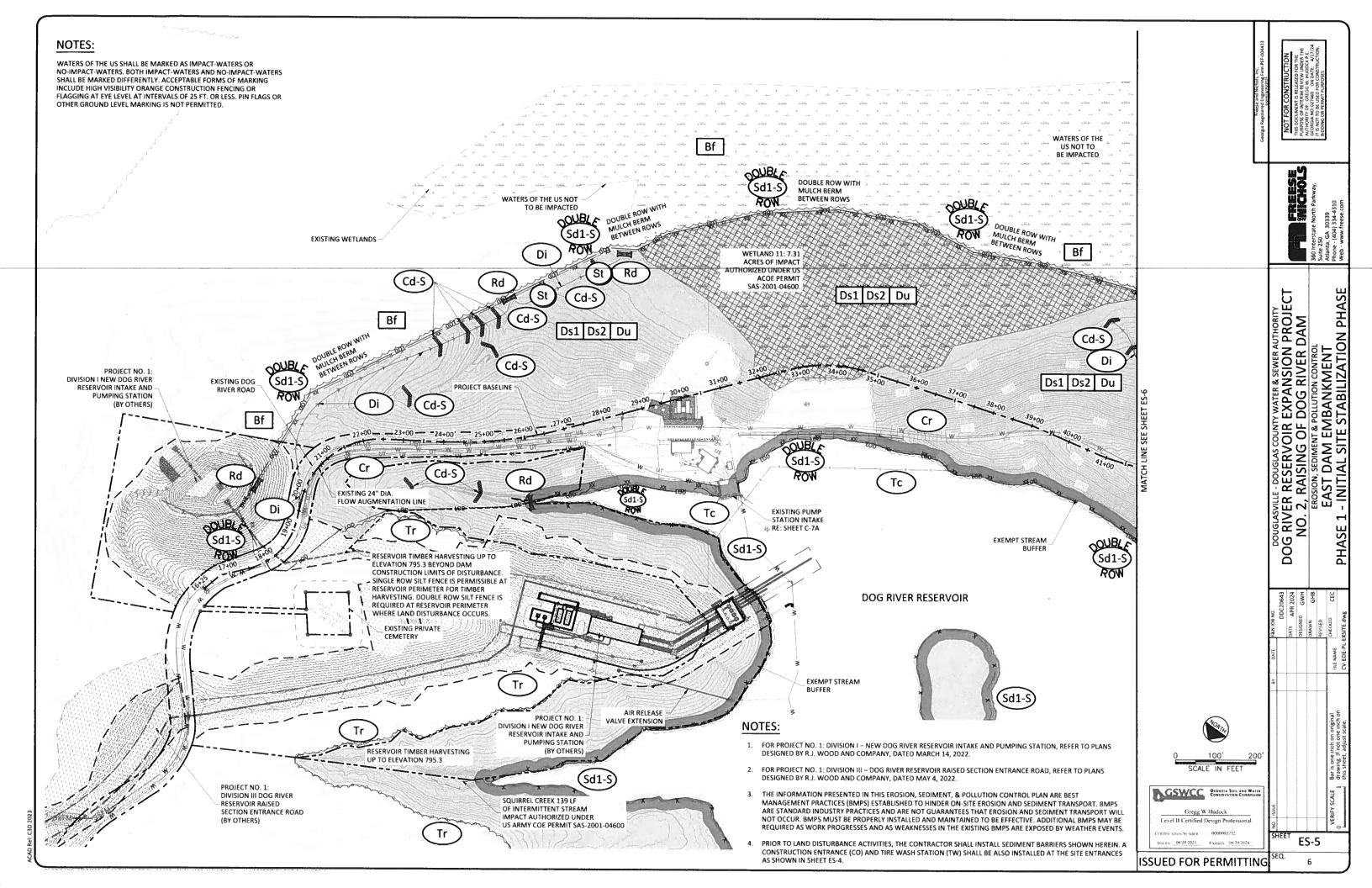


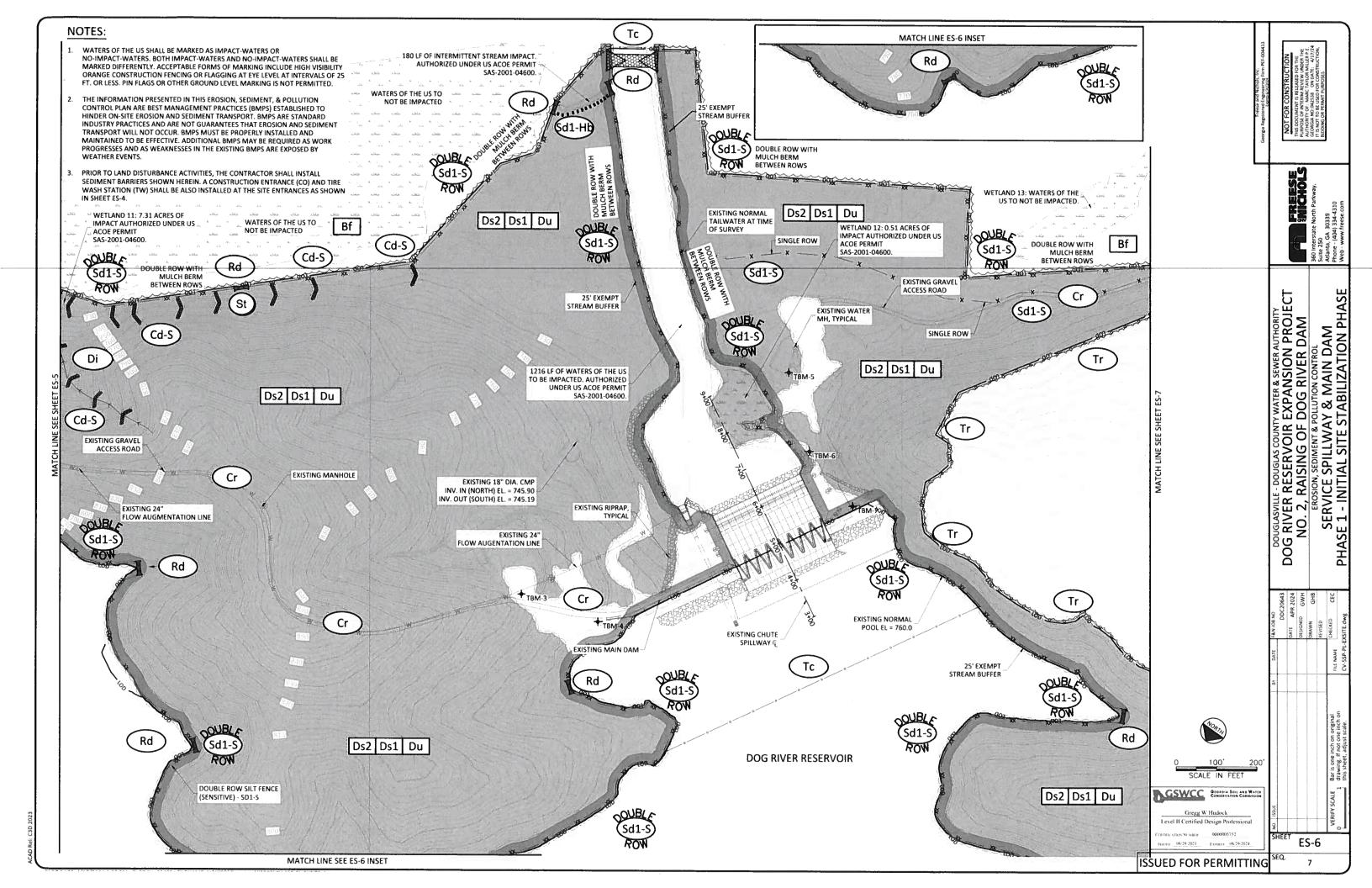












NOTES:

- WATERS OF THE US SHALL BE MARKED AS IMPACT-WATERS OR 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 INTERVALS OF 25 FT. OR LESS. PIN FLAGS OR OTHER GROUND LEVEL MARKING IS NOT PERMITTED.
- 2. THE INFORMATION PRESENTED IN THIS EROSION, SEDIMENT, & 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 REQUIRED AS WORK PROGRESSES AND AS WEAKNESSES IN THE FXITTING RMPS ARE FXPOSED BY WEATHER EVENTS.

