

**Minutes of the South Fulton Municipal Regional Water And
Sewer Authority Meeting Held on July 09th, 2019,
Union City, City Hall, 5047 Union Street, Union City, GA 30291**

BOARD MEMBERS PRESENT: Elizabeth Carr Hurst, Shayla J. Nealy, Laura Mullis, Sonja Fillingame and James Whitmore

BOARD MEMBERS ABSENT: J. Clark Boddie and Vince R. Williams

Consultants Present: Dennis Davenport, Dan Post, Laura Benz and Andrea Gray

Others Present: None

Call To Order: Chairwoman Shayla J. Nealy called the meeting to order at 7:00 PM.

Approval Of The Minutes: A motion was made by Elizabeth Carr Hurst to approve the minutes of the June 11th, 2019 meeting, seconded by Laura Mullis. A vote was taken, the motion passed unanimously.

New Business: None

Old Business: None

Reports:

Legal – Dennis Davenport stated he has nothing to report this month.

Dennis Davenport stated that the Authority is required to post each meeting in the local newspaper, but no other government is required to place adds in their local paper, so when Mr. Davenport submits the request to change the name of the Authority, he will add a request to the legislation to change that requirement.

Shayla J. Nealy asked for the Board members to submit asked the Board to start thinking about a new name for the Authority and email them to Beth Williford.

Finance – Dan Post reviewed with the Board:

1. The June 2019 financial statement.
2. Requested approval for draw number 194 in the amount of \$23,719.91 from the construction account.

Laura Mullis made a motion to approve draw number 194 in the amount of \$23,719.91 from the construction account seconded by James Whitmore. A vote was taken, the motion passed unanimously.

Project Managers – Laura Benz and Andrea Gray reviewed with the Board:

See attached memorandum for details

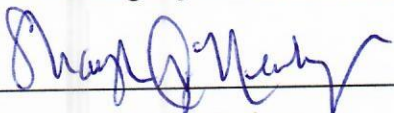
Chairwoman Shayla J. Nealy stated that she had not received a response from Mayor Bottoms as of today.

1. Water Withdrawal Application Process:
 - a. Notice of Intent
 - b. Information needed from the three Cities
 - c. Treatability Analysis
 - d. Swap
2. Compensatory Mitigation
 - a. Site Specific Sites
 - b. Resale of Mitigation Credits

Executive Session: None

Sonja Fillingame made a motion to adjourn the meeting, seconded by James Whitmore. A vote was taken, the motion passed unanimously.

The meeting adjourned at 7:12 PM



Shayla J. Nealy, Chairwoman

August 13th, 2019

Date Minutes Approved by Board

MEMORANDUM

To: S. Fulton Municipal Regional Water & Sewer Authority Member Cities Councils
(Fairburn, Palmetto and Union City)

From: Laura Benz & Andrea Gray

Date: July 9, 2019

Re: S. Fulton Authority Project Update

Water Withdrawal Application/Process: EPD published the Notice of Intent to issue the permit to the three cities with a thirty (30) day comment period beginning March 8, 2019. The City of Atlanta requested a 30-day extension to the comment period, which was granted, resulting in the comment period expiring on May 8, 2019. EPD received three comments letters all dated May 8, 2019 submitted by the City of Atlanta, Atlanta Regional Commission and the Chattahoochee Riverkeeper.

The Authority's consultants continue to prepare the response to comments and scheduled a meeting with EPD to discuss the draft on July 29, 2019. Following the meeting, the comments will be finalized and presented to the Authority for final review. However, in order for the comment responses to be complete, the Cities must provide the information requested via email on June 10, 2019 and again at the June 11, 2019 Authority meeting which includes:

1. Updated water distribution system map illustrating the water infrastructure owned by each city
2. Information regarding any interruptions in service from Atlanta
3. Amended Metropolitan North Georgia Water Planning District Plan audit to reflect the requirements set forth in the 2017 Plan

A copy of the complete Audit Application and Action Items by Entity was emailed on June 11, 2019 and an additional copy is attached hereto for reference.

Treatability Analysis: An engineering report will be required as a part of the Water System Permit (a separate permit required to operate the system which is issued upon construction of the facilities).

SWAP: ARC continues to work towards the SWAP being completed by January 1, 2020.

Next Steps: Obtain the final information needed to prepare the response to comments, meet with EPD to finalize the responses, update the engineering RFP for the preliminary engineering work and refine the budget and cost estimates accordingly and evaluate sources of funds including additional GEFA loans.

Compensatory Mitigation

Site Specific Sites: The Mitigation Bankers continue to work through the mitigation bank authorization process and the coordination with new regulatory guidance. The Prospectus for the Mulberry Creek site was submitted in January.

Resale of Mitigation Credits: Credits from the Monastery of the Holy Ghost are still pending, however USACE mitigation personnel is considering allowing the Monastery to move forward independent of the Monastery's other mitigation banking efforts. Attached is the credit ledger for the credits currently pending a Statement of Credit Availability executed and pledged towards a permit action from the Blue Creek mitigation bank.

Metropolitan North Georgia Water Planning District

Action Items by Entity

Entity	Entity Type			Integrated-1.1	Integrated-1.2	Integrated-1.3	Integrated-1.4
	Local Government	Water Provider	Wastewater Provider				
City of College Park	X	X		X		X	X
City of East Point	X	X		X	X	X	X
City of Fairburn	X	X		X		X	X
City of Hapeville	X	X		X		X	X
City of Johns Creek	X			X		X	X
City of Milton	X			X		X	X
City of Mountain Park	X	X		X		X	X
City of Palmetto	X	X	X	X	X	X	X
City of Roswell	X	X		X	X	X	X
City of Sandy Springs	X			X		X	X
City of South Fulton	X			X		X	X
City of Union City	X	X		X		X	X
Gwinnett County	X	X	X	X	X	X	X
City of Auburn	X	X		X	X	X	X
City of Berkeley Lake	X			X		X	X
City of Buford	X	X		X	X	X	X
City of Dacula	X			X		X	X
City of Duluth	X			X		X	X
City of Grayson	X			X		X	X
City of Lawrenceville	X	X		X		X	X
City of Lilburn	X			X		X	X
City of Norcross	X			X		X	X
City of Peachtree Corners	X			X		X	X
City of Rest Haven	X			X		X	X

Metropolitan North Georgia Water Planning

Action Items by Entity

Entity															
	Integrated-2	Integrated-3	Integrated-4	Integrated-5	Integrated-6	Integrated-7	Integrated-8	Integrated-9	Integrated-10	Integrated-10.1	Integrated-10.2	Integrated-10.3	Integrated-10.4	Integrated-11	Integrated-12
City of College Park	X	X		X		X	X	X	X					X	X
City of East Point	X	X		X	X	X	X	X	X					X	X
City of Fairburn	X	X		X		X	X	X	X					X	X
City of Hapeville	X	X		X		X	X	X	X					X	X
City of Johns Creek				X		X	X	X	X					X	X
City of Milton				X		X	X	X	X					X	X
City of Mountain Park	X	X		X		X	X	X	X					X	X
City of Palmetto	X	X	X	X	X	X	X	X	X					X	X
City of Roswell	X	X		X	X	X	X	X	X					X	X
City of Sandy Springs				X		X	X	X	X					X	X
City of South Fulton				X		X	X	X	X					X	X
City of Union City	X	X		X		X	X	X	X					X	X
Gwinnett County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Auburn	X	X		X		X	X	X	X					X	X
City of Berkeley Lake				X		X	X	X	X					X	X
City of Buford	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Dacula				X		X	X	X	X					X	X
City of Duluth				X		X	X	X	X					X	X
City of Grayson				X		X	X	X	X					X	X
City of Lawrenceville	X	X		X		X	X	X	X					X	X
City of Lilburn				X		X	X	X	X					X	X
City of Norcross				X		X	X	X	X					X	X
City of Peachtree Corners				X		X	X	X	X					X	X
City of Rest Haven				X		X	X	X	X					X	X

Metropolitan North Georgia Water Planning

Action Items by Entity

Entity	Action Items by Entity														
	Integrated-13 Water Provider	Integrated-13.1	Integrated-13.2	Integrated-13.3	Integrated-14	WSWC-1	WSWC-2	WSWC-3	WSWC-4	WSWC-5	WSWC-6	WSWC-7	WSWC-8	WSWC-9	WSWC-10
City of College Park						X	X	X	X	X	X	X	X	X	X
City of East Point						X	X	X	X	X	X	X	X	X	X
City of Fairburn						X	X	X	X	X	X	X	X	X	X
City of Hapeville						X	X	X	X	X	X	X	X	X	X
City of Johns Creek						X						X			
City of Milton						X						X			
City of Mountain Park						X	X	X	X	X	X	X	X	X	X
City of Palmetto					X	X	X	X	X	X	X	X	X	X	X
City of Roswell						X	X	X	X	X	X	X	X	X	X
City of Sandy Springs						X						X			
City of South Fulton						X	X	X	X	X	X	X	X	X	X
City of Union City						X	X	X	X	X	X	X	X	X	X
Gwinnett County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Auburn						X	X	X	X	X	X	X	X	X	X
City of Berkeley Lake						X						X			
City of Buford	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Dacula						X	X	X	X	X	X	X	X	X	X
City of Duluth						X						X			
City of Grayson						X						X			
City of Lawrenceville						X	X	X	X	X	X	X	X	X	X
City of Lilburn						X						X			
City of Norcross						X						X			
City of Peachtree Corners						X						X			
City of Rest Haven						X						X			

Metropolitan North Georgia Water Planning

Action Items by Entity

Entity	Action Items by Entity														
	WSWC-11.1	WSWC-11.2	WSWC-11.3	WSWC-11.4	WSWC-11.5	WSWC-11.6	WSWC-11.7	WSWC-12	WSWC-13	WSWC-14	WSWC-15	WSWC-16	WW-1	WW-2	WW-3
City of College Park	X	X	X	X	X	X	X	X	X	X	X	X			
City of East Point	X	X	X	X	X	X	X	X	X	X	X	X			
City of Fairburn	X	X	X	X	X	X	X	X	X	X	X	X			
City of Hapeville	X	X	X	X	X	X	X	X	X	X	X	X			
City of Johns Creek	X	X	X					X	X						
City of Milton	X	X	X					X	X						
City of Mountain Park	X	X	X	X	X	X	X	X	X	X	X	X			
City of Palmetto	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Roswell	X	X	X	X	X	X	X	X	X	X	X	X			
City of Sandy Springs	X	X	X					X	X						
City of South Fulton	X	X	X					X	X						
City of Union City	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Gwinnett County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Auburn	X	X	X	X	X	X	X	X	X	X	X	X			
City of Berkeley Lake	X	X	X					X	X						
City of Buford	X	X	X					X	X						
City of Dacula	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Duluth	X	X	X					X	X						
City of Grayson	X	X	X					X	X						
City of Lawrenceville	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Lilburn	X	X	X					X	X						
City of Norcross	X	X	X					X	X						
City of Peachtree Corners	X	X	X					X	X						
City of Rest Haven	X	X	X					X	X						

Metropolitan North Georgia Water Planning

Action Items by Entity

Entity	Action Items										Watershed				
	WW-4	WW-5	WW-6.1	WW-6.2	WW-6.3	WW-6.4	WW-6.5	WW-6.6	WW-7	WW-8	WW-9	WW-10	Watershed-1	Watershed-2	Watershed-3
City of College Park								X					X	X	X
City of East Point								X					X	X	X
City of Fairburn								X					X	X	X
City of Hapeville								X					X	X	X
City of Johns Creek								X					X	X	X
City of Milton								X					X	X	X
City of Mountain Park								X					X	X	X
City of Palmetto	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Roswell								X					X	X	X
City of Sandy Springs								X					X	X	X
City of South Fulton								X					X	X	X
City of Union City								X					X	X	X
Gwinnett County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Auburn								X					X	X	X
City of Berkeley Lake								X					X	X	X
City of Buford	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
City of Dacula								X					X	X	X
City of Duluth								X					X	X	X
City of Grayson								X					X	X	X
City of Lawrenceville								X					X	X	X
City of Lilburn								X					X	X	X
City of Norcross								X					X	X	X
City of Peachtree Corners								X					X	X	X
City of Rest Haven								X					X	X	X

Audit Checklist
Metropolitan North Georgia Water Planning District
2017 - 2022 Plan Implementation

The following pages present the requirements from the Water Resource Management Plan for the years 2017-2022 in a checklist format. Documentation and supporting records must be listed in the checklist and be submitted on a USB flash drive.

The action items from the Water Resource Management Plan are listed by responsible party on the second worksheet. The third worksheet indicates the action items that should be implemented by the permittee that is being audited and the fourth contains the audit form itself. For the Water Resource Management Plan implementation guidance and full descriptions of the action items, please visit www.northgeorgiawater.org. The subtasks (or if there is no subtask, the action item) are the standards that must be met under this audit, and to determine whether each subtask (or action item) has been met, EPD will refer to the implementation guidance.

Under the Compliance Status, choose either the "yes" "no" or "in process" for each requirement. "Yes" means the requirement has been met and adequate supporting documentation has been provided (e.g. copies of ordinances, policies, local plans, maps, meeting minutes, meeting agendas, approved rate schedules, correspondence, spreadsheets), the comment section should include the date of implementation, and a brief description. "No" means the requirement has not been met and requires an explanation. Finally, for any items that are in progress and will be implemented in the near future, please check "in process", and please provide implementation dates and/or schedule for completion in the comments section. Please indicate if an intergovernmental agreement is in place for another entity to handle specific action items by including a copy of the agreement and a description in the comment section. If pursuant to an intergovernmental agreement you are handling specific action items for another entity, EPD may ask you to assist in providing information or completing an audit checklist for such entity for the applicable action items.

Permittee:

Contact Name / Title:

Email Address / Phone Number:

Address / City / State/ Zip Code:

Please list all relevant permits and their permit numbers or N/A:

Water withdrawal permits:

Public Water system permits:

Wastewater Treatment system permits:

MS4 Stormwater Discharge permits:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

By entering my name electronically, I am acknowledging that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Electronic Signature and Date:

Metropolitan North Georgia Water Planning District
Water Resource Management Plan Audit

Instructions: Select Permittee from the drop down list. Under the Compliance Status, choose either the "yes" "no" or "in progress" for each requirement. "Yes" means the requirement has been met and adequate supporting documentation has been provided (e.g. copies of ordinances, policies, local plans, maps, meeting minutes, meeting agendas, approved rate schedules, correspondence, spreadsheets), the comments section should include the date of implementation, and a brief description. "No" means the requirement has not been met and requires an explanation. Finally, for any items that are in progress and will be implemented in the near future, please type "in progress", and provide implementation dates and/or schedule for completion in the comments section. Please indicate if an intergovernmental agreement is in place for another entity to handle specific action items by including a copy of the agreement and a description in the comments section. If pursuant to an intergovernmental agreement you are handling specific action items for another entity, EPD may ask you to assist in providing information or completing an audit checklist for such entity for the applicable action items.

Permittee: Please select your entity from the dropdown list

Local Government:

Water Provider:

Wastewater Provider:

- Check box if community is an approved MS4
- Check box if community has an approved CMOM program

Action Item	Yes, No, In Progress	Documentation	Comments
ACTION ITEM Integrated-1: Coordinated Actions			
Integrated-1	Establish annual coordination meetings among entities within the same or in neighboring jurisdictions to support integrated water resource management.		
Integrated-1.1	Conduct an annual meeting with local watershed management staff and land use planning and zoning staff on issues related to watershed management, as they are linked to land use planning and decisions. Consider holding this meeting more frequently, particularly during updates to the local Comprehensive Land Use Plan.		
Integrated-1.2	Identify source water watersheds within the jurisdiction as well as priority issues and areas for watershed protection actions. Conduct an annual meeting of local government staff and water supply providers to discuss local issues and priorities.		
Integrated-1.3	Conduct an annual meeting with local governments, water providers, planning and zoning staff, and County Board of Health staff on water supply and conservation action items.		
Integrated-1.4	Conduct an annual meeting with local governments, wastewater providers, watershed management/stormwater staff and County Board of Health staff on watershed issues related to sanitary sewer and septic system management to address bacteria and other water quality concerns (see Action Items INTEGRATED-8 through INTEGRATED-11).		
ACTION ITEM Integrated-2: Local Water Master Plans			
Integrated-2	Develop and maintain local water master plans that reflect available water sources, water source development and water treatment facility and/or water distribution improvement needs based on future water demands.		
Integrated-2.1	Develop and maintain a local water master plan with a planning horizon consistent with this Plan (through 2050).		
Integrated-2.2	Update the local water master plan every five years and as otherwise needed to support projects and remain consistent with regional and state requirements.		
Integrated-2.3	Include a section in the next update of the water master plan entitled Climate Resiliency. This section shall discuss infrastructure potentially vulnerable to extreme weather events and identify adaptive strategies for mitigating impacts.		
ACTION ITEM Integrated-3: Update Local Emergency Water Plans			
Integrated-3	Develop or update local emergency water plans to include sufficient emergency water supply sources and detailed steps to modify system operations in order to accept or share water with adjacent local water providers. Review interconnection reliability targets to		
Integrated-3.1	Adopt a written local emergency water plan that defines specific steps required to accept or share water in an emergency.		
Integrated-3.2	Assess the need for the establishment and maintenance of service connections and share existing regional water supplies, where practicable.		
Integrated-3.3	Meet interconnection reliability targets and ensure that such interconnections provide needed reliability, efficiency and emergency water supplies.		
ACTION ITEM Integrated-4: Local Wastewater Master Plans			
Integrated-4	Develop and maintain a local wastewater master plan that addresses wastewater collection, treatment, and effluent and biosolids management.		
Integrated-4.1	Develop and maintain a local wastewater master plan that addresses wastewater collection, wastewater treatment, and effluent and biosolids management. The plan should have a planning horizon consistent with this Plan (through 2050).		
Integrated-4.2	Update the local wastewater master plan every five years, at a minimum, and as otherwise needed to support projects and to remain consistent with regional and State policy.		
Integrated-4.3	Include a section in the next update of the wastewater master plan entitled Climate Resiliency. This section shall discuss infrastructure potentially vulnerable to extreme weather events and identify adaptive strategies for mitigating impacts.		
ACTION ITEM Integrated-5: Connections to Public Sewer			
Integrated-5	Each local government shall coordinate with the local wastewater provider and develop and maintain sewer connection policies, including policies addressing redevelopment and conversion of septic systems to sewer service.		
ACTION ITEM Integrated-6: Source Water Assessment and Protection Program			
Integrated-6	Develop a Source Water Protection Plan that delineates raw water sources and identifies the potential sources of contamination to the drinking water supply.		
Integrated-6.1	Delineate the source water assessment area.		
Integrated-6.2	Conduct an inventory of potential sources of contamination.		
Integrated-6.3	Determine the susceptibility of the water supply to contamination.		
Integrated-6.4	Publish the results of the source water assessment in the Consumer Confidence Report (CCR).		
Integrated-6.5	Integrate this information into the Local Emergency Water Plan (Action Item INTEGRATED-3).		
Integrated-6.6	Update the SWAP by January 1, 2020 and every 10 years thereafter.		
ACTION ITEM Integrated-7: Water Supply Watershed Protection			

Action Item	Yes, No, In Progress	Documentation	Comments
Integrated-7	Adopt water supply watershed buffers as required by the Part V Environmental Planning Criteria established by Georgia DCA and enforced by Georgia EPD. Develop and implement Inter-jurisdictional agreements as necessary.		
Integrated-7.1	Identify source water supply watersheds within its jurisdiction, as well as priority issues and areas for watershed protection, in coordination with local water provider.		
Integrated-7.2	Adopt the Part V Environmental Planning Criteria, including adoption of drinking water supply watershed buffers in local ordinances.		
ACTION ITEM Integrated-8: Septic System Planning			
Integrated-8	Develop a plan that identifies where and under what conditions septic systems are appropriate given long-term water quality and quantity concerns.		
Integrated-8.1	Determine future septic system areas and local requirements related to septic system planning.		
Integrated-8.2	Develop near-term and long-term written policies for transitioning unsewered areas to sewer areas.		
ACTION ITEM Integrated-9: Septic System Critical Area Management			
Integrated-9	Identify septic system critical areas, including existing and potential problem areas, and assign additional management requirements for septic systems in those areas.		
Integrated-9.1	Identify critical areas including assessment of risk of and potential impacts on water quality from septic system failures.		
Integrated-9.2	Provide enhanced management for septic systems in identified critical areas.		
ACTION ITEM Integrated-10: Septic System Septage Disposal			
Integrated-10	Develop a plan for the disposal of septage generated within a local jurisdiction at local WWTPs or alternative disposal locations.		
Integrated-10.1	Each local government shall develop a plan for septage disposal when determining future areas served by septic and developing wastewater master plans		
Integrated-10.2	Determine acceptable parameters for septage disposal at local wastewater treatment facilities.		
Integrated-10.3	Collect septage hauling manifests and provide them to the County Board of Health at least once per year.		
Integrated-10.4	Plan for future septage disposal needs when upgrading or designing new wastewater treatment facilities.		
Integrated-10.4	Report septage quantity received, rate structure for disposal, and septage receiving policies each year to the Metro Water District by treatment facility. This information will be used for District tracking as well as shared with the GADPH for coordination with certified haulers.		
ACTION ITEM Integrated-11: Septic System Maintenance Education			
Integrated-11	Each local government shall offer ongoing septic system maintenance education as part of a local government's watershed management education programs.		
ACTION ITEM Integrated-12: Private Decentralized Wastewater Systems Ordinance			
Integrated-12	Adopt and maintain local ordinances regarding decentralized wastewater systems and provide technical support when ordinance changes are proposed.		
Integrated-12.1	Adopt a private wastewater system ordinance that either prohibits private decentralized wastewater treatment systems or provides technical specifications for these systems.		
Integrated-12.2	Provide a copy of the ordinance to Georgia EPD and Georgia DCA and incorporate into local wastewater master plans.		
ACTION ITEM Integrated-13: Corps Reservoirs - Storage, Withdrawals and Returns			
Integrated-13	<u>Allatoona and Lanier water and wastewater providers only:</u>		
Integrated-13	<u>Allatoona and Lanier water providers only:</u> Each local water provider that withdraws or plans to withdraw water from Allatoona Lake or Lake Lanier shall, after the date of this plan, coordinate with the State of Georgia through its designated implementing agency(ies) in any requests for water supply storage from the Corps in either Allatoona Lake or Lake Lanier.		
Integrated-13.1	<u>Each local wastewater provider that returns or may in the future return highly treated wastewater to Allatoona Lake, Lake Lanier, or any tributary to these reservoirs shall:</u> Ensure that treatment capacity developed by the local wastewater provider and permitted wastewater discharges are consistent with the projected wastewater treatment capacities and wastewater discharges included in this Plan (as it may be amended from time to time).		
Integrated-13.2	<u>Each local wastewater provider that returns or may in the future return highly treated wastewater to Allatoona Lake, Lake Lanier, or any tributary to these reservoirs shall:</u> If due to changed circumstances or an increase in projected wastewater flows compared to what is included in this Plan a local wastewater provider plans to (a) increase its wastewater treatment capacity by building a new or expanded wastewater treatment plant, (b) change the location of a currently permitted wastewater discharge to a new location outside of the river basin from which the water was sourced or (c) enter into a new or expanded intergovernmental agreement to send wastewater flows to another local wastewater provider - then the local wastewater provider shall request an amendment to this Plan reflecting such changes. Any requested amendment must be approved by the District prior to Georgia EPD issuing the requested permit.		

Action Item		Yes, No, In Progress	Documentation	Comments
Integrated-13.3	<p>Each local wastewater provider that returns or may in the future return highly treated wastewater to Allatoona Lake, Lake Lanier, or any tributary to these reservoirs shall:</p> <p>Any local wastewater provider seeking an amendment to this Plan as described above in Subtask 2 shall meet with staff for the District and provide any information necessary to support an amendment to this Plan. Such information may include, but is not limited to, current wastewater discharge information, projected future wastewater flows, and capital improvement plans. In reviewing the requested amendment, the District's governing board shall consider, among other factors, whether the local wastewater provider's requested amendment includes returning, where feasible, highly treated wastewater to Allatoona Lake, Lake Lanier and their tributaries.</p>			
ACTION ITEM Integrated-14: Encouraging the Return of Highly Treated Wastewater to the Chattahoochee and Flint				
Integrated-14	Chattahoochee and Flint wastewater providers only:			
Integrated-14.1	Ensure that treatment capacity developed by the local wastewater provider and permitted wastewater discharges are consistent with the projected wastewater treatment capacities and wastewater discharges included in this Plan (as it may be amended from time to time).			
Integrated-14.2	If due to changed circumstances or an increase in projected wastewater flows compared to what is included in this Plan a local wastewater provider plans to (a) increase its wastewater treatment capacity by building a new or expanded wastewater treatment plant, (b) change the location of a currently permitted wastewater discharge to a new location outside of the river basin from which the water was sourced or (c) enter into a new or expanded intergovernmental agreement to send wastewater flows to another local wastewater provider - then the local wastewater provider shall request an amendment to this Plan reflecting such changes. Any requested amendment must be approved by the District prior to Georgia EPD issuing the requested permit.			
Integrated-14.3	Any local wastewater provider seeking an amendment to this Plan as described above in Subtask 2 shall meet with staff for the District and provide any information necessary to support an amendment to this Plan. Such information may include, but is not limited to, current wastewater discharge information, projected future wastewater flows, and capital improvement plans. In reviewing the requested amendment, the District's governing board shall consider, among other factors, whether the local wastewater provider's requested amendment includes returning, where feasible, highly treated wastewater to the Chattahoochee River Basin below Buford Dam and Upper Flint River Basin.			
ACTION ITEM WSWC-1: Water Conservation Program				
WSWC-1	Provide sufficient funding and staffing to implement the required water conservation measures in this Plan.			
WSWC-1.1	Provide for sufficient funding to implement the required water conservation measures in this Plan; funding levels will vary from jurisdiction to jurisdiction.			
WSWC-1.2	Provide for dedicated, conservation-focused staffing to implement the required water conservation measures in this Plan; staffing levels will vary from jurisdiction to jurisdiction.			
ACTION ITEM WSWC-2: Conservation Pricing				
WSWC-2	Implement water conservation pricing rate structures as a means to reduce discretionary water use.			
WSWC-2.1	Institute a minimum three-tiered water conservation pricing schedule for single-family residential customers.			
WSWC-2.2	Determine appropriate rates for commercial, multi-family, industrial and institutional categories that encourage conservation by reducing discretionary water use.			
WSWC-2.3	If irrigation meters are allowed, develop an irrigation meter pricing schedule that recognizes the impact on peak demand from irrigation. The irrigation rate should be significantly higher than the rate for indoor use. At a minimum, the rate for irrigation use by all customer classes should be equal to or greater than 200 percent of the first tier rate for single-family residential customers.			
WSWC-2.4	Review and adjust pricing schedule to respond to changes in demand and ensure sufficient operation and maintenance funds are available on an as needed basis.			
ACTION ITEM WSWC-3: Billing Cycles and Billing System Functionality				
WSWC-3	Implement billing systems that communicate usage with customers, bill on a monthly basis and provide regionally consistent water consumption data.			
WSWC-3.1	Sub-divide customers into the following minimum principal customer categories where appropriate: single family residential, multi-family residential, commercial, industrial and institutional.			
WSWC-3.2	Bill monthly to allow customers to track water use more effectively.			
WSWC-3.3	Provide historical and current data on bills and when customers pay online.			
WSWC-3.4	Clearly identify the billing units, with preference given towards gallon-based units. Most customers are familiar with gallons as a unit of measure and less familiar with other units.			
WSWC-3.5	Include explanation of conservation pricing to customers on their bills or a link on their bills to such information on the website.			
ACTION ITEM WSWC-4: Private Fire Lines Metering Requirement				
WSWC-4	Adopt an ordinance or policy to meter private fire lines supplying commercial buildings to identify avoidable system leakage and non-fire related water consumption.			
WSWC-4.1	Adopt an ordinance or policy by January 1, 2019 to require private fire lines supplying all new commercial buildings to have full flow meters or double detector checks.			

Action Item		Yes, No, In Progress	Documentation	Comments
WSWC-4.2	Adopt an ordinance or policy by January 1, 2019 to require private fire lines supplying any commercial building that is undergoing a substantial renovation to have full flow meters or double detector checks.			
WSWC-4.3	Incorporate these private fire line metering requirements by January 1, 2019 into the development review process.			
ACTION ITEM WSWC-5: AMI Benefit and Feasibility Studies				
WSWC-5	Evaluate the improvement of customer metering technologies to improve accuracy, notify customers of suspected leaks, enhance customer service and provide other benefits. This includes metering technology with the capability to store hourly readings (or more			
WSWC-5.1	Except for those local water providers that have already completed or are currently installing AMI system-wide or that have completed an AMI pilot program pursuant to Action Item 5.15 of the 2009 Plan (as amended), all other local water providers shall conduct a system-specific study by December 31, 2018 on the benefits and feasibility of the system-wide installation of AMI.			
WSWC-5.2	If a local water provider determines that such system-specific study has shown that system-wide implementation is feasible and yields sufficient benefits, then develop a plan, schedule and budget to implement AMI system-wide.			
WSWC-5.3	If a local water provider has already completed or is installing AMI system-wide whether based on a pilot program or benefits and feasibility study, then implement a program to identify, notify and track customers with continuous usage, if not already completed.			
ACTION ITEM WSWC-6: Toilet Replacement Program				
WSWC-6	Implement a program to replace older, inefficient toilets with WaterSense labeled high-efficiency toilets in single- and multi-family homes.			
WSWC-6.1	Establish a program to replace 3.5 gpf or greater toilets in single- and multi-family homes constructed prior to 1994 with high-efficiency WaterSense labeled toilets.			
WSWC-6.2	Provide information on opportunities to recycle any toilet being discarded pursuant to the toilet replacement program by linking to the Metro Water District website or other local resources.			
ACTION ITEM WSWC-7: High-Efficiency Toilets and Urinals in Government Buildings				
WSWC-7	Replace toilets using 3.5 gpf or more and urinals using 1.0 gpf or more with WaterSense labeled high-efficiency toilets and urinals in local government buildings.			
WSWC-7.1	Develop a written list for all remaining buildings owned by the local water provider and local government (excluding buildings owned by the local public school system, sheriff's office or tax commissioner's office) that still have toilets using 3.5 gpf or more and urinals using more than 1.0 gpf by January 1, 2018.			
WSWC-7.2	Develop a retrofit schedule and funding mechanism to replace all the inefficient toilets and urinals in the buildings on the retrofit list by January 1, 2020 with high-efficiency WaterSense labeled toilets and urinals.			
WSWC-7.3	Replace all the inefficient toilets and urinals in the buildings on the retrofit list by January 1, 2020; based on the 2009 Plan, local government and local water providers should be able to show that this retrofitting is underway.			
WSWC-7.4	For all buildings owned by the local public school system, sheriff's office or tax commissioner's office, the local water provider serving these buildings shall coordinate regarding these buildings with the appropriate elected officials and staff to perform each of the subtasks above with a target start date for retrofits of January 1, 2019 and completion date of January 1, 2025.			
ACTION ITEM WSWC-8: Commercial Water Use Assessments				
WSWC-8	Develop or participate in a commercial water use assessment program that targets highest commercial customers or other groups of commercial customers that may have significant water savings potential.			
WSWC-8.1	Target highest commercial customers, or other groups of commercial customers identified by the local water provider that may have significant water savings potential, and advertise water use assessment program.			
WSWC-8.2	Establish a program or participate in the District's regional program to conduct water use assessments with interested commercial customers and report results with recommendations to these customers with cost-beneficial water conservation measures.			
ACTION ITEM WSWC-9: Pre-Rinse Spray Valve Replacement Program				
WSWC-9	Implement a replacement program for pre-rinse spray valves in food preparation facilities.			
WSWC-9.1	Develop a program to replace older pre-rinse spray valves with EPA WaterSense certified models.			
WSWC-9.2	Use the Metro Water District's outreach material or other media in a targeted effort to recruit food preparation facilities for this program.			
WSWC-9.3	Track the number of pre-rinse spray valve replacements made annually.			
ACTION ITEM WSWC-10: Outdoor Water Requirements for Large Landscapes				
WSWC-10	Each local water provider shall adopt an ordinance or policy by January 1, 2019 requiring all new irrigation systems for large landscapes (greater than one acre or 43,560 square feet and excluding single-family homes) to include: <ul style="list-style-type: none"> • Pressure regulators and master shut-off valves • Flow sensors that detect and report high flow conditions due to broken pipes and/or popped sprinkler heads 			
ACTION ITEM WSWC-11: State Water Conservation and Drought Response Requirements				
WSWC-11	Continue adopting, implementing and complying with existing state laws related to water conservation and drought response.			

Action Item		Yes, No, In Progress	Documentation	Comments
WSWC-11.1	Adopt and implement the Georgia State Minimum Standard Plumbing Code that requires high-efficiency plumbing fixtures in all new construction.			
WSWC-11.2	Implement existing Georgia state law requiring that new irrigation systems in the Metro Water District be installed with a rain shutoff sensor.			
WSWC-11.3	Coordinate with and provide support to the local water provider as necessary to implement all responsibilities pursuant to the Drought Management Rule, and if any inconsistencies are identified, then update such plans to ensure they are consistent with the Drought Management Rule.			
WSWC-11.4	Adopt and implement an ordinance or policy to measure the use of each unit in new multi-unit residential, retail and light industrial buildings based on the measured quantity of water used by each unit, as required by and subject to the exceptions in O.C.G.A. § 12-5-180.1.			
WSWC-11.5	Comply with water conservation plan and drought contingency plan prepared in connection with any application for a new or modified surface or ground water withdrawal permit. See Georgia Rules and Regulations, Chapter 391-3-6-.07(4)(b)(8) and (9) and 391-3-2-.04(11).			
WSWC-11.6	Review the water conservation plan and drought contingency plan for consistency with the Drought Management Rule, and if any inconsistencies are identified, then update such plans to ensure they are consistent with the Drought Management Rule.			
WSWC-11.7	Coordinate with and request support from local government(s) as necessary to implement all responsibilities under the drought management rule, including applicable drought response strategies under drought response level 1, 2, 3 or 3 plus pursuant to the Drought Management Rule (Georgia Rules and Regulations, Chapter 391-3-30).			
ACTION ITEM WSWC-12: Require New Car Washes to Recycle Water				
WSWC-12	Each local government shall adopt an ordinance that requires all new conveyor car washes to install operational recycled water systems. A minimum of 50 percent of water used must be recycled.			
ACTION ITEM WSWC-13: Water Waste Policy				
WSWC-13	Each local government shall adopt a water waste ordinance or policy to reduce outdoor water waste.			
ACTION ITEM WSWC-14: Water System Asset Management				
WSWC-14	Develop an asset management program that ensures proper management of the water system.			
WSWC-14.1	Develop a map of the water distribution system and assets. All local water providers shall develop digital GIS water system mapping by January 1, 2021.			
WSWC-14.2	Develop a written asset management program to prioritize and implement activities to inspect, maintain and rehabilitate the local water system components.			
ACTION ITEM WSWC-15: Water Loss Control and Reduction				
WSWC-15	Develop and implement program to identify and reduce real water losses. (for local water providers serving at least 3,300 individuals)			
WSWC-15.1	Comply with Georgia EPD's Water Supply Efficiency Rule (see Georgia Rules and Regulations, Chapter 391-3-33 and any related guidance that may be issued from time to time [the "Water Supply Efficiency Rule"], including but not limited to the requirements for water loss audits, reporting and demonstration of progress.			
WSWC-15.2	Track key metrics from the AWWA water audit annually as required by the Georgia Water Stewardship Act and the Water Supply Efficiency Rule.			
WSWC-15.3	For each local water provider with density greater than 32 connections per mile of main and real losses above 60 gallons per day per connection (based on 2013 water loss audit results), adopt a 2025 goal to reduce real losses to less than 60 gallons per day per connection and demonstrate progress in the interim years toward meeting this goal. Systems that achieve this goal prior to 2025 should continue cost-effective water loss controls and initiate progress toward 35 gallons per day per connection.			
WSWC-15.4	For each local water provider with density greater than 32 connections per mile of main and real losses are between 35 and 60 gallons per day per connection (based on 2013 water loss audit results), adopt a 2025 goal to reduce real losses to less than 35 gallons per day per connection and demonstrate progress in the interim years towards meeting this goal. Systems that achieve this goal prior to 2025 should continue cost-effective water loss controls by setting new individualized goals and demonstrating progress as required by the Water Supply Efficiency Rule.			
WSWC-15.5	If a local water provider required to adopt a target pursuant to Sub-Tasks (3) and (4) above reasonably believes after detailed analysis that the applicable 2025 goal exceeds its system-specific economic level of leakage, then the local water provider may send a notice to the District Chairperson by no later than July 1, 2018 establishing a new 2025 goal. See implementation guidance below for details on this notice.			
ACTION ITEM WSWC-16: Local Public Education Program				
WSWC-16	Develop and implement a local water efficiency and conservation education program.			
WSWC-16.1	Implement education activities as outlined in Action Item PUBLIC EDUCATION-1. (See requirements based on population size.)			
WSWC-16.2	Distribute high-efficiency retrofit kits to residential water customers.			
WSWC-16.3	Provide residential water assessment information to residential water customers.			

Action Item		Yes, No, In Progress	Documentation	Comments
WSWC-16.4	Promote the EPA WaterSense New Homes program.			
WSWC-16.5	Provide information on water efficient landscape practices to residential water customers.			
ACTION ITEM WW-1: Enhanced Reliability of Wastewater Pumping Stations				
WW-1	Enhance reliability of wastewater pumping stations by further clarifying backup power requirements.			
WW-1.1	Maintain a file of the firm capacity of all pump stations within the wastewater master plan (see Action Item INTEGRATED-4).			
WW-1.2	For all newly constructed major (one MGD or greater firm capacity) wastewater pump stations, or those receiving an upgrade to a firm capacity of one MGD or greater, provide a dedicated secondary power supply, emergency generator(s) or dedicated stand-by pumping system to allow continued firm pumping capacity with the primary power supply out of service.			
WW-1.3	For wastewater pump stations with firm capacity less than one MGD without a dedicated secondary power supply or emergency generator, provide, at a minimum, to enhance reliability: a. Backup power connection via an emergency generator receptacle b. Availability of a portable utility-owned or rental generator c. Quick connections for a stand-by pumping system d. Availability of a portable utility owned or rental pumps or an overflow basin sized for at least 24-hour overflow protection under maximum month average daily flow conditions			
WW-1.4	Compliance with this action item shall be achieved by January 1, 2021.			
ACTION ITEM WW-2: Sewer System Inventory and Mapping				
WW-2	For wastewater providers who do not have an approved CMOM with Georgia EPD, develop and maintain a digital sewer system map based on a survey and inventory of the sewer system.			
WW-2.1	Determine a sewer system mapping strategy. Outline a plan, schedule, and budget for sewer system mapping.			
WW-2.2	Collect field data for sewer system database development, possibly in an electronic form.			
WW-2.3	Create a sewer system map based on the database. All wastewater utilities shall develop digital GIS sewer system mapping by January 1, 2021.			
WW-2.4	Update sewer system maps periodically to include sewer system extensions and rehabilitation projects.			
WW-2.5	Identify critical infrastructure based on risk and consequence of failure.			
ACTION ITEM WW-3: Sewer System Maintenance Management				
WW-3	For wastewater providers who do not have an approved CMOM with Georgia EPD, develop and implement a Computerized Maintenance Management System (CMMS) and standard operating procedures (SOPs) for maintenance management of collection system			
WW-3.1	Select a CMMS and purchase any necessary hardware.			
WW-3.2	Establish SOPs for maintenance management.			
WW-3.3	Implement a CMMS and SOPs.			
ACTION ITEM WW-4: Sewer System Inspection Program				
WW-4	For wastewater providers who do not have an approved CMOM with Georgia EPD, maintain a sanitary sewer system inspection program that determines the condition of the sanitary sewer system and identifies any needed maintenance and rehabilitation activities.			
WW-4.1	Establish standard inspection and condition assessment procedures and cleaning protocols.			
WW-4.2	Execute these programs to document condition of existing assets at least once per decade or as recommended by the utility's asset management program based on criticality.			
ACTION ITEM WW-5: Sewer System Rehabilitation Program				
WW-5	For wastewater providers who do not have an approved CMOM with Georgia EPD, prioritize rehabilitation projects based on risk and consequence of failure. Budget and execute capital projects to rehabilitate existing infrastructure and document completed projects			
WW-5.1	Prioritize rehabilitation projects and document the priority list.			
WW-5.2	Develop implementation plan for rehabilitation projects based on budget schedule, and staffing.			
WW-5.3	Implement a program to rehabilitate infrastructure based on schedule and budget for critical infrastructure.			
WW-5.4	Include rehabilitation needs as part of the annual planning and budget process.			
WW-5.5	Document the rehabilitation performed in the asset management program and its beneficial effects of I/I on the sewer system where applicable.			
ACTION ITEM WW-6: Capacity Certification Program				
WW-6	For wastewater providers who do not have an approved CMOM with Georgia EPD, maintain a program and process for certifying wastewater collection system capacity for new development and redevelopment projects.			
WW-6.1	Maintain a flow and rainfall monitoring program to support the hydraulic modeling and capacity certification program.			
WW-6.2	Maintain a hydraulic model to determine available capacity.			
WW-6.3	Determine system capacity.			
WW-6.4	Maintain procedures for certifying available capacity.			
WW-6.5	Certify availability of capacity for proposed developments.			
WW-6.6	Develop and implement procedures to coordinate with the local wastewater provider at the determined level of the planning/development review process.			
ACTION ITEM WW-7: Grease Management Program				
WW-7	For wastewater providers who do not have an approved CMOM with Georgia EPD, implement and maintain a grease management program, including procedures for grease control and enforcement, inspection and tracking of grease traps and permitting and			

Action Item		Yes, No, In Progress	Documentation	Comments
WW-7.1	Establish an ordinance or policy regulating the grease traps and discharges from industrial, institutional and commercial facilities.			
WW-7.2	Establish an enforcement program.			
WW-7.3	Develop written methods and procedures for preventing and controlling discharges of grease from industrial, institutional and commercial facilities.			
WW-7.4	Develop an inspection and tracking methodology.			
WW-7.5	Develop an inspection and permitting program for trucks used to pump grease traps or delegate inspection responsibilities to a designee.			
ACTION ITEM WW-8: Sewer System Overflow Emergency Response Program				
WW-8	For wastewater providers who do not have an approved CMOM with Georgia EPD, maintain a sewer system overflow emergency response program, including updating SOPs, as necessary, and executing existing programs to respond and provide notifications.			
WW-8.1	Review SSO emergency response program to ensure local response program complies with Federal and State requirements.			
WW-8.2	Update and add SOPs to ensure proper response to overflow.			
ACTION ITEM WW-9: Sewer System Inspection and Maintenance Training				
WW-9	For wastewater providers who do not have an approved CMOM with Georgia EPD, maintain a staff training program for sewer system inspection and maintenance.			
WW-9.1	Review status of existing staff certification and continuing training credits to ensure they meet State requirements under the Wastewater Collection System Operator license.			
WW-9.2	Schedule additional training as needed for new or existing personnel.			
ACTION ITEM WW-10: Local Public Education Program				
WW-10	Develop and implement a local public education program on wastewater topics.			
WW-10.1	Implement education activities as outlined in Action Item PUBLIC EDUCATION-1. (See requirements based on population size.)			
WW-10.2	Direct at least one public education activity to address the proper disposal of fats, rags, oil and grease.			
ACTION ITEM Watershed-1: Post-Development Stormwater Management				
Watershed-1	Adopt a post-development stormwater management ordinance, a local design manual and a site plan development plan review and inspection process to address post-development stormwater management.			
Watershed-1.1	Adopt the Metro Water District Model Post-Development Stormwater Management Ordinance for New Development and Redevelopment Ordinance or an equivalent ordinance at least as effective, based on the guidance in the latest Georgia Stormwater Management Manual (GSMM) and MS4 permit as applicable.			
Watershed-1.2	Adopt and implement site plan reviews for development plans based on the GSMM or equivalent local design manual.			
Watershed-1.3	Require maintenance agreements on all new post-construction stormwater facilities, including local inspections.			
Watershed-1.4	Develop a site development plan review and inspection process and checklist(s) that lists stormwater and watershed management related requirements.			
ACTION ITEM Watershed-2: Construction Erosion and Sedimentation Control				
Watershed-2	Comply with the requirements of the Georgia Erosion and Sedimentation Act (GESA).			
Watershed-2.1	Communities that do not have Local Issuing Authority (LIA) status through Georgia EPD must ensure that local public projects are properly permitted with Georgia EPD. Efforts will be employed to ensure that locally funded projects comply with all erosion and sedimentation control requirements.			
Watershed-2.2	Communities that have LIA status are to review, inspect and enforce erosion and sedimentation control requirements at the local level, including: a. Educate applicants of the Notice of Intent requirement under the NPDES Construction Permit and ensure the mandatory fee per disturbed acre is collected as described in the Notice of Intent. Plans must be submitted to the local Soil and Water Conservation District for review and approval prior to issuing a land disturbance permit, unless a memorandum of understanding has been signed by the LIA, the local Soil and Water Conservation District, and the Georgia SWCC which allows the LIA to conduct in-house reviews. b. Ensure that erosion and sedimentation control measures are properly designed, installed and maintained. c. Verify that site personnel involved with the project are certified to perform land disturbance activities; verification can be checked on the Georgia SWCC website. d. Identify deficiencies and take enforcement actions where necessary.			
ACTION ITEM Watershed-3: Floodplain Management				
Watershed-3	Adopt a floodplain management and flood damage prevention ordinance, develop and maintain floodplain maps, and incorporate ordinance review and enforcement procedures into development plan reviews.			
Watershed-3.1	Adopt the Model Floodplain Management/Flood Damage Prevention Ordinance, or an equivalent ordinance at least as effective.			

Action Item		Yes, No, In Progress	Documentation	Comments
Watershed-3.2	Make revisions to local plan review processes and procedures to incorporate the model ordinance or other regulations.			
Watershed-3.3	For all streams with drainage areas greater than 100 acres, delineate and map the 100-year future-conditions floodplain and update floodplain maps as needed. For streams that drain 100 to 640 acres (one square mile), communities may choose to delineate future condition maps or require developers to delineate future conditions on a site by site basis. Delineating future floodplain boundaries for streams that drain greater than 640 acres are always the responsibility of the local government. Georgia EPD provides additional guidance regarding Floodplain Management on their website.			
Watershed-3.4	Incorporate future floodplain mapping into development review procedures and regulate development based on the future-conditions floodplain maps, as available.			
ACTION ITEM Watershed-4: Stream Buffer Protection				
Watershed-4	Adopt a stream buffer protection ordinance and incorporate review and enforcement procedures into development plan reviews.			
Watershed-4.1	Adopt the Metro Water District Model Stream Buffer Protection Ordinance, or an equivalent ordinance or other regulation at least as effective.			
Watershed-4.2	Incorporate compliance with this ordinance into development review and inspection procedures.			
ACTION ITEM Watershed-5: Illicit Discharge Detection and Elimination (IDDE) Program				
Watershed-5	Adopt an ordinance and develop and implement a local program to address illicit discharges and illegal connections to the stormwater system.			
Watershed-5.1	Adopt the Metro Water District Model Illicit Discharge and Illegal Connection Ordinance, or an equivalent ordinance or other regulation at least as effective			
Watershed-5.2	<p>For MS4 permittees only: Develop an IDDE program with inspection and enforcement procedures consistent with Phase I and II MS4 permits</p> <p>or</p> <p>Communities without an MS4 permit: Follow methods in the Metro Water District Standards and Methodologies for Surface Water Monitoring</p>			
Watershed-5.3	Incorporate an enforcement process into development review procedures.			
ACTION ITEM Watershed-6: Litter Control				
Watershed-6	Adopt a litter control ordinance.			
Watershed-6.1	Adopt the Metro Water District Model Litter Control Ordinance, or an equivalent ordinance or other regulation that is at least as effective.			
Watershed-6.2	Develop inspection, violation and enforcement procedures based on the ordinance or equivalent regulation.			
ACTION ITEM Watershed-7: Promoting a Green Infrastructure Approach				
Watershed-7	Implement development and land use policies or practices to encourage the protection of greenspace and/or the use of green infrastructure within the community.			
Watershed-7.1	<p>Each local government shall select and implement one or more of the following options that <i>go above and beyond current MS4 requirements</i> to address growth management for the protection of water resources by encouraging protection of open space and greenspace and use of green infrastructure:</p> <ol style="list-style-type: none"> 1. Adopt protective ordinances or other local mechanisms to preserve open space and greenspace for watershed protection while accommodating development. 2. Develop and adopt a formalized Greenspace or Green Infrastructure Plan. 3. Identify impediments and barriers to the use of the green infrastructure and greener approaches to growth consistent with MS4 permit requirements for Phase I and II communities with a population greater than 10,000. Evaluate local building codes, ordinances and other regulations and provisions for potential barriers. Identify opportunities to promote the use of infiltration, reuse and evapotranspiration. <p>or</p> <ol style="list-style-type: none"> 4. Develop a green infrastructure program that evaluates the feasibility and applicability of different green infrastructure and low impact development practices, develops an inventory of these practices within the community and establishes inspection procedures and responsibility for green infrastructure in a manner consistent with MS4 permit requirements. 			
ACTION ITEM Watershed-8: Watershed Improvement Projects				
Watershed-8	Identify substantially-impacted watersheds and implement WIPs to address impaired waters.			
Watershed-8.1	Identify substantially-impacted watersheds based on local criteria and the Georgia EPD 303(d) list of impaired streams.			

Action Item		Yes, No, In Progress	Documentation	Comments
Watershed-8.2	Prioritize impaired watersheds for retrofit and restoration activities that can be conducted as WIPs as a part of a Watershed Improvement Plan.			
Watershed-8.3	Incorporate WIPs into the local Capital Improvement Plan list and develop implementation schedule.			
Watershed-8.4	Design and construct WIPs based on local implementation schedule as budgets and resources allow.			
ACTION ITEM Watershed-9: Ongoing Stormwater System Management				
Watershed-9	Conduct ongoing management of stormwater infrastructure to ensure effective functioning and watershed protection.			
Watershed-9.1	Develop a stormwater infrastructure inventory, including: a. Establishment of data objectives and requirements and a data collection schedule b. Development of an inventory and map of the public stormwater system c. Maintenance and updating of inventory data as required			
Watershed-9.2	Develop an extent and level of service policy.			
Watershed-9.3	Develop a stormwater systems inspections program.			
Watershed-9.4	Develop a stormwater maintenance program.			
Watershed-9.5	Establish pollution prevention /good housekeeping for local operations, including: a. Identification of public facilities and activities with pollution potential b. Development of practices and procedures to prevent pollution			
ACTION ITEM Watershed-10: Long-term Ambient Trend Monitoring				
Watershed-10	Perform long-term trend water quality monitoring program that includes permanent, representative stations, as well as monitoring of 303(d) listed stream segments for the parameters of concern.			
Watershed-10.1	Monitor permanent representative stations. Develop and implement a long-term monitoring plan consistent with any one of the following three options: a. Georgia EPD-approved Watershed Protection Plan b. Other plan that is consistent with the Metro Water District Standards and Methodologies for Surface Water Monitoring with the exception of bacteria (which are addressed in Sub-Task #2 below). For local governments without a Georgia EPD-approved Watershed Protection Plan, the sampling of the following precipitation events and frequencies are required: • A total of six events annually for wet weather monitoring: minimum of three wet weather samples during each of the summer and winter seasons (May-Oct, Nov-April) • A total of two events annually for dry weather monitoring: minimum of one dry weather sample during each of the summer and winter seasons (May-Oct, Nov-April) or c. Establish an MOA or MOU with another jurisdiction that will conduct monitoring on behalf of your community. Local governments that have an established MOA or MOU with another jurisdiction that holds a Georgia EPD-approved Watershed Protection Plan should monitor, at a minimum, per the MOA or MOU.			

Action Item	Yes, No, In Progress	Documentation	Comments
Watershed-10.2			
<p>Monitor 303(d) representative stations. Develop and implement a TMDL monitoring plan for 303(d) listed stream segments, with the exception of impaired biota (see Note), using any one of the following four options:</p> <p>a. Georgia EPD-approved Impaired Waters Monitoring and Implementation Plan (IWP) associated with an MS4 permit</p> <p>b. Plan that is consistent with the Metro Water District Standards and Methodologies for Surface Water Monitorings for waterbodies with 303(d) listings in a local community</p> <p>c. Georgia EPD-approved Sampling Quality Assurance Plan (SQAP), which is a requirement for data submitted for 305(b)/303(d) listing or delisting of waterbodies. A local government may have developed a SQAP in association with an IWP or for another purpose. It may be developed for a specific stream segment or broader use.</p> <p>d. Establishment of an MOA or MOU with another local government that will conduct monitoring on your behalf. Note that this option is available to local governments that may not have a Georgia EPD-approved Watershed Protection Plan or provide wastewater services, if these communities are coordinating with another local government that has a Georgia EPD-approved Watershed Protection Plan where the service area includes both jurisdictions.</p>			
Watershed-10.3			
Track data annually to identify changes and conduct a more detailed analysis every three to five years to identify long-term trends, successes and potential WIPs (see Action Item WATERSHED-8).			
Watershed-10.4			
After the Metro Water District establishes a reporting process, submit data annually to the District using the electronic Watershed Assessment Data Reporting Template from Georgia EPD. As of the publication of this Plan, the Metro Water District has not yet established this process.			
ACTION ITEM Watershed-11: Macroinvertebrate Bioassessment			
Watershed-11			
Perform benthic macroinvertebrate and habitat monitoring of Wadeable streams at permanent representative stations.			
Watershed-11.1			
<p>Select permanent representative macroinvertebrate bioassessment stations. Develop and implement a long-term monitoring plan that fulfills any of the following three options:</p> <p>a. Georgia EPD-approved Watershed Protection Plan</p> <p>b. Other plan that is consistent with the most recent Georgia EPD Macroinvertebrate Bioassessment Standard Operating Procedures. For local governments without a Georgia EPD-approved Watershed Protection Plan, habitat and biological monitoring shall be conducted at all permanent representative stations that are monitored for Action Item WATERSHED-10.</p> <p>or</p> <p>c. Establishment of an MOA or MOU with another local government that will conduct monitoring on your behalf. Note that this option is available to local governments who may not have a Georgia EPD-approved Watershed Protection Plan or provide wastewater services, if these local governments are coordinating with another local government that has a Georgia EPD-approved Watershed Protection Plan where the service area includes both jurisdictions.</p>			
Watershed-11.2			
Track data during each sampling event to identify changes and conduct a more detailed analysis every three to five years to identify long-term trends, successes and potential WIPs (see Action Item WATERSHED-8)			
Watershed-11.3			
After the Metro Water District establishes a reporting process, submit data annually to the Metro Water District using the electronic Watershed Assessment Data Reporting Template from Georgia EPD. As of the publication of this Plan, the Metro Water District has not yet established this process.			
ACTION ITEM Watershed-12: Local Public Education Program			
Watershed-12			
Each local government shall develop and implement a local public education program that addresses watershed protection, stormwater issues and prevention of nonpoint source pollution in compliance with Action Item PUBLIC EDUCATION-1. (See requirements based on population size.)			

July 9, 2019

Laura W. Benz

Benz Law Group, LLC

19 W Broad Street

Newnan, GA 30263

Email: Laura@LWBenz.com

Subject: Mitigation Repurchase Agreement Monthly Update

Mrs. Benz,

Please let this letter serve as an update to our repurchase agreement with South Fulton Municipal Regional Water and Sewer Authority. We plan on giving a monthly update to keep the Authority updated on progress and transactions for complete transparency. Regulatory updates, sales updates, reservation ledgers, sales ledgers and copies of transactions will be given every month to keep the Authority updated. Please let me know if anyone has any further questions or if there is any other information that you would like to be included monthly.

Blue Creek

Regulatory Update

- Working with EPD on our stream buffer variance. Working towards starting stream construction by the end of the year.

Sales Update

- Sent Douglas County final bid document on June 28th. Waiting to hear back from them.
- We have 2 reservation contracts for the purchase of stream credits.
- Not doing in reservation from Blue Creek until we figure out what is going on with Douglas County.

Monastery of Holy Ghost

Regulatory Update

- We reached out the Justin Hammomnds, the mitigation liaison for Savannah USACE, about making the wetland credits available for purchase from the Monastery. Justin informed us that he would like to know the plan for Honey Creek Mitigation Bank before making the credits available. Honey Creek is another mitigation bank owned by the Monastery that has yet to be constructed.
- Waiting for Monastery decision on how to move forward with project.

Sales Update

- We are not actively marketing the credits at this time because we do not know when the credits will be available.