

Project Plan: Bonita – Superior Project Area

Project ID: C02-TMDL-03

POLLUTANT: METALS**SCHEDULE: 2013****DEQ Project Management Team:**

Project Coordinator

Eric Sivers

Project Manager – Metals

Eric Sivers

Basic TMDL Scope:

Pollutant Group	Number of Segments	Number of TMDLs
Metals	4	13 – 20 (contingent upon final impairment determination outcomes)

Approvals:

Mark Bostrom: Watershed Quality Planning Bureau Chief

Dean Yashan: Watershed Management Section Supervisor

Mindy McCarthy: Quality Assurance Officer

Darrin Kron: Monitoring & Assessment Section Supervisor

Eric Sivers: Metals Project Manager & Coordinator

PROJECT BASIS

This project plan is for **METALS** Total Maximum Daily Load (TMDL) development within the *Bonita – Superior TMDL Project Area*. This section provides an overview of the legal driver for TMDLs and the steps involved in TMDL development and how this project plan is used for quality control purposes during the TMDL process.

In 1972, the U.S. Congress passed the Water Pollution Control Act, more commonly known as the Clean Water Act (CWA). The CWA's goal is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The CWA requires each state to designate uses of their waters and to develop water quality standards to protect those uses. Each state must monitor their waters to track if they are supporting their designated uses.

Montana's water quality designated use classification system includes the following uses:

- aquatic life
- wildlife
- recreation
- agriculture
- industry
- drinking water

Each waterbody has a set of designated uses. Montana has established water quality standards to protect these uses. Waterbodies that do not meet one or more standards are called impaired waters. Every two years DEQ must file a Water Quality Integrated Report (IR), which lists all impaired waterbodies and their identified impairment causes. Impairment causes fall within two main categories: pollutant and non-pollutant.

Montana's biennial IR identifies all the state's impaired waterbody segments. All waterbody segments within the IR are indexed to the National Hydrography Dataset (NHD). The 303(d) list portion of the IR includes all of those waterbody segments impaired by a pollutant, which require a TMDL. TMDLs are not required for non-pollutant impairments. **Table 1-1** in **Section 1.3** identifies metals impairments for the Bonita – Superior TPA from Montana's 2012 303(d) List.

Both Montana state law (Section 75-5-701 of the Montana Water Quality Act) and section 303(d) of the federal CWA require the development of TMDLs for all impaired waterbodies when water quality is impaired by a pollutant. A TMDL is the maximum amount of a pollutant that a waterbody can receive without exceeding water quality standards.

Developing TMDLs and water quality improvement strategies includes the following components:

- Determining measurable target values to help evaluate the waterbody's condition in relation to the applicable water quality standards
- Quantifying the magnitude of pollutant contribution from their sources
- Determining the TMDL for each pollutant based on the allowable loading limits for each waterbody-pollutant combination

- Allocating the total allowable load (TMDL) into individual loads for each source

In Montana, restoration strategies and monitoring recommendations are also incorporated in TMDL documents to help facilitate TMDL implementation.

TMDL Development Quality Assurance requirements are obtained via the TMDL Project Planning process, which is consistent with the WQPB Quality Management Plan. This process includes the development of a TMDL Project Plan project as a first tier. The TMDL project plan justifies the need for a data collection and source assessments that typically involve the development of one or more Sampling and Analysis Plans (SAPs) or modeling project plans as a second tier of quality assurance planning. This tiered process is a logical approach for a large and complex environmental project, such as TMDL development, that may involve several separate sampling and source assessment tasks. These unique monitoring and assessment tasks are often implemented over a two to three year period and are all integrated within the larger TMDL project via the TMDL project plan. This approach improves efficiency and quality by providing an effective and timely way to integrate improved assessment or sampling methods during the TMDL project implementation period.

PART 1: BASIC SCOPE & PROJECT MANAGEMENT

1.1 INTRODUCTION

This document presents a plan for completing 13-20 **METALS TMDLs** in the Bonita – Superior TMDL Project Area (project area) and is intended as a guide to the project team and DEQ management. It also provides DEQ management, the DEQ QA officer, WMS staff, and watershed stakeholders with an understanding of the basic approach and schedule for completing these TMDLs. The plan specifies the project goals and objectives, and defines the project scope in terms of the study area boundaries, waterbodies to be addressed, and pollutant groups to be considered. The project scope is built upon the project definition as defined by DEQ management. The plan also describes TMDL-development approaches and the specific tasks required in order to complete the TMDLs. Because each successive task builds upon the results of the previous tasks, it is important to note that the scope of work and schedule evolves over time. Future modifications/updates will be presented in **Section 9** as amendments to this document.

1.2 PROJECT AREA

The project area (**Figure 1**) encompasses approximately 50 square miles in western Montana, near the town of Superior and former townsite of Bonita. The project area includes 3 watersheds tributary to the Clark Fork River, from headwaters to mouth. Flat Creek and Hall Gulch are within the Middle Clark Fork Tributaries TMDL Planning Area, and both Wallace and Cramer are located in the Clark Fork Drummond TMDL Planning Area. These boundaries were defined in 2000, but are altered for this project in the interests of efficiency. The Bonita – Superior Metals TMDL project includes all Clark Fork River tributaries from both of these TMDL planning areas where metals impairments have been identified.

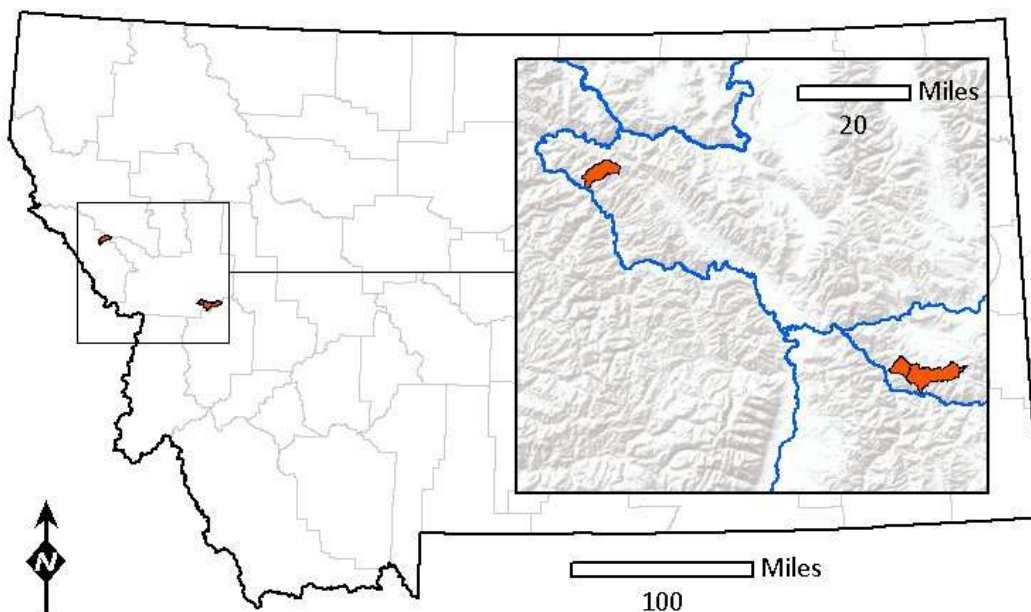


Figure 1: Location map

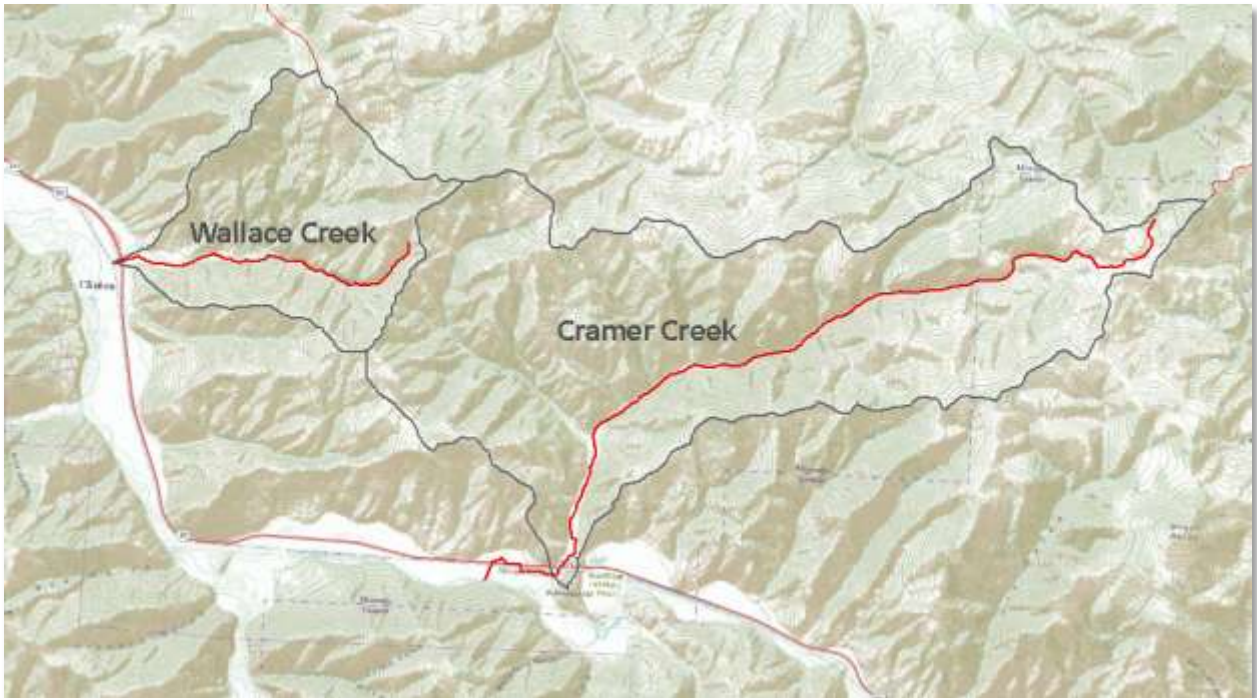


Figure 2: Wallace Creek & Cramer Creek overview map

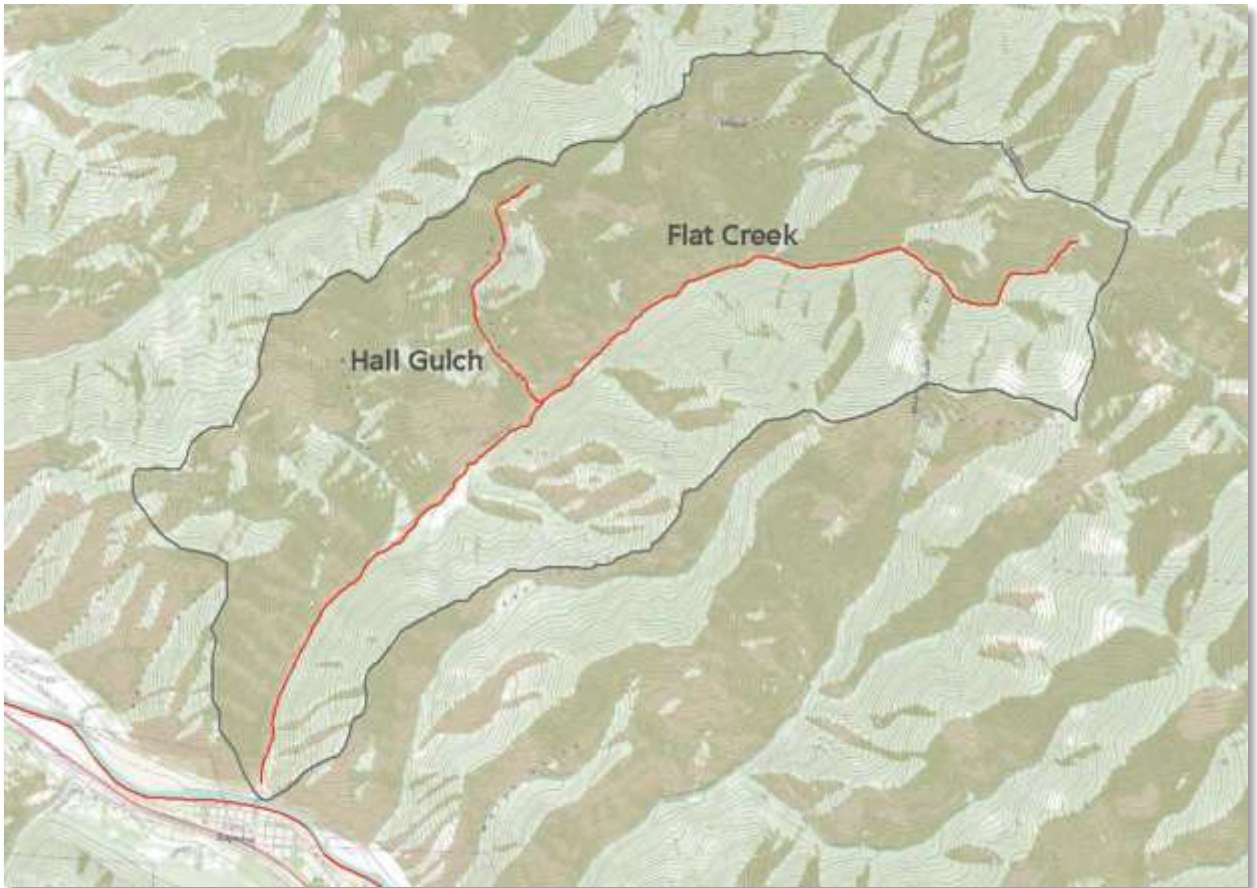


Figure 3: Flat Creek & Hall Gulch overview map

1.3 TMDL POLLUTANT SCOPE AND RATIONALE

TMDLs are developed for metals waterbody – pollutant combinations within the project area. All Bonita – Superior streams on the 2012 303(d) list for causes linked to metals are identified in **Table 1-1** below. The final number of TMDLs developed will partly depend upon re-evaluation of the impairment determinations, which is currently underway by DEQ’s Monitoring and Assessment Section. Some waterbody – pollutant combinations may be delisted due to non-impairment. Proposed metals impairments for TMDL development within this project are presented in **Table 1-2**.

Table 1-1: 2012 303(d) Metals Listings in the Bonita – Superior Project Area

Assessment Unit	Waterbody Name	2012 303d listing
MT76E004_010	Wallace Creek	Copper
MT76E004_010	Wallace Creek	Zinc*
MT76E004_020	Cramer Creek	Arsenic*
MT76E004_020	Cramer Creek	Barium*
MT76E004_020	Cramer Creek	Cobalt*
MT76E004_020	Cramer Creek	Copper*
MT76E004_020	Cramer Creek	Lead
MT76E004_020	Cramer Creek	Mercury*
MT76M002_180	Flat Creek	Antimony
MT76M002_180	Flat Creek	Arsenic
MT76M002_180	Flat Creek	Cadmium
MT76M002_180	Flat Creek	Copper*
MT76M002_180	Flat Creek	Lead
MT76M002_180	Flat Creek	Mercury

* Potential for delisting due to non-impairment

Table 1-2: Proposed Metals TMDLs to develop in the Bonita – Superior Project Area

Assessment Unit	Waterbody Name	2014 303d listing
MT76E004_010	Wallace Creek	Copper
MT76E004_020	Cramer Creek	Aluminum*
MT76E004_020	Cramer Creek	Lead
MT76M002_180	Flat Creek	Antimony
MT76M002_180	Flat Creek	Arsenic
MT76M002_180	Flat Creek	Cadmium
MT76M002_180	Flat Creek	Lead
MT76M002_180	Flat Creek	Zinc*
MT76M002_180	Flat Creek	Mercury
MT76M002_200	Hall Gulch	Arsenic*
MT76M002_200	Hall Gulch	Lead*
MT76M002_200	Hall Gulch	Zinc*
MT76M002_200	Hall Gulch	Antimony*

*denotes a new identified impairment cause based on recent Monitoring and Assessment Group data evaluation.

Barium and cobalt impairments for Cramer Creek are based upon concentrations in sediment samples collected in 1993. While there are no aquatic life criteria for these metals, there is a human health standard of 2 mg/L for barium.

1.4 TMDL DOCUMENTATION

Although all three waterbodies are the subject of this plan, DEQ will publish the Bonita – Superior metals TMDLs in two documents: one for the Bonita area (Wallace and Cramer Creeks) and one for the Superior area (Flat Creek and Hall Gulch). DEQ believe this approach will be better suited to the interests of local stakeholders.

TMDLs from this project are scheduled for completion in 2012. The project only addresses metals. Both Flat Creek and Cramer Creek have sediment impairments that will be addressed within a separate TMDL project, scheduled for completion in 2013 or 2014. This separate sediment project is currently within what is referred to as the Central Clark Fork Tributaries TMDL Project Area.

SECTION TWO –TMDL PROJECT CONSIDERATIONS

A watershed characterization is being completed for the Bonita – Superior project area to describe the physical, cultural and ecological context of the project area. These descriptions include information regarding local geology, geography, land use, ownership, climate, biology and more.

2.1 LINKAGE TO OTHER TMDLS

Each of the 4 streams drains into the Clark Fork River. Metals TMDLs for the Clark Fork River will be developed in a future project focused on the Clark Fork River mainstem and Silver Bow Creek. The load allocations provided in the Bonita – Superior TMDLs should be adequate to protect downstream uses in the Clark Fork River. Cramer Creek and Flat Creek are also listed for sedimentation/siltation; TMDLs addressing these impairments will be developed and published separately at a later date.

2.2 PROJECT COORDINATION AND STAKEHOLDER OUTREACH

The DEQ project coordinator will organize stakeholder groups into technical and watershed advisory groups. Details of stakeholder outreach are described in **Section Five** of this plan.

2.3 WATERBODY TYPE AND CLASSIFICATION

Cramer Creek, Wallace Creek, Flat Creek and Hall Gulch are all classified as B-1 waters. They drain into the Clark Fork River, which is also a B-1 water where it receives these streams.

Streams classified B-1 are suitable for drinking, culinary and food processing purposes after conventional treatment for removal of impurities, natural or not. B-1 classified waters must be suitable for bathing, swimming, and recreation; growth and propagation of salmonid fishes and associated aquatic life, waterfowl, and furbearers; and agricultural and industrial water supply.

The '1' denotes the suitability of propagation of salmonid fishes and associated aquatic life with '1' being suitable growth. A '2' denotes marginal growth.

2.4 POTENTIAL RESOURCE CONSIDERATIONS

Flat Creek was formerly used as a drinking water source by the town of Superior, but this use was discontinued after discovery of elevated metals concentrations.

2.5 PERMITTED SURFACE AND GROUND WATER DISCHARGES

No MPDES or ground water permitted discharges are identified within the project area.

2.6 SOURCE INVENTORY AND SOURCE COMPLEXITY

The project area includes areas impacted by historical mining and milling. Placer and lode mining was practiced in each of the 3 watersheds. Metals sources in these watersheds are well known and have been investigated through several efforts by state and federal agencies. It is unlikely that TMDL development activities will provide new source information that is not already available, but instead summarize the information in an updated way with focus on achieving water quality standards. TMDL development will rely on existing information as well as synoptic sampling conducted by DEQ in 2011 for TMDL and assessment purposes.

2.6.1 Flat Creek & Hall Gulch

The Flat Creek watershed includes the Iron Mountain Mine Mill site, which is an abandoned mine/mill site currently listed on EPA's National Priority List (aka "Superfund"). Metals sources in the project area are well known and have been investigated through numerous efforts by the state and EPA. It is unlikely that TMDL development activities will provide any new information regarding source complexity. The Flat Creek watershed downstream of the mine site is an operable unit (OU2) of the NPL site. Other OUs include the town of Superior and the Wood Gulch waste rock repository.

The tributary drainage of Hall Gulch includes the Belle of the Hills mine and the Dillon Millsite. The former mining town of Pardee was located in Hall Gulch.

2.6.2 Wallace Creek

The Wallace Creek drainage includes the Cape Nome and Hidden Treasure mines. A mill was constructed along Wallace Creek to process copper ore bound for smelters in Anaconda. Operations were generally small-scale and short-lived. The site is listed as a Priority Abandoned Mine by DEQ Remediation Division, but no remedial actions have been performed.

2.6.3 Cramer Creek

Two open-pit mines operated during the late 1940s and 1950s: the Blacktail (silver-lead) and Arrowhead (manganese) mines. Ore was milled on the Blacktail (aka Linton) property, adjacent to Cramer Creek. This site is listed as a Priority Abandoned Mine by DEQ Remediation Division, and was referred to the BLM, which administers the land. The BLM reclaimed the property in 2001 -2004. The activity consisted of removing 130,000 cubic yards of mine waste from the creek bottom. Some was used to backfill open adits and the remainder went to a waste repository.

SECTION THREE – LEVEL OF TMDL DETAIL

The level of detail employed for technical assessments is typically a balance between time, available resources, source complexity and potential implications of TMDL allocations.

For the Bonita – Superior TPA, a **medium level of detail** will be employed in developing metals TMDLs and allocations. State and Federal programs have investigated and documented identified metals sources, and DEQ Monitoring & Assessment Section has collected recent water quality data adequate to characterize current conditions. Therefore, TMDL development will rely heavily on this existing information to calculate existing loading and derive load and wasteload allocations. It is not expected that further data collection will be necessary for the completion of all metals TMDLs.

SECTION FOUR – BASIC STRATEGY FOR TMDL PROCESS

- 1) Allocations – Pollutant load and wasteload allocations (lbs/day) are flow-based, so allowable loads increase with flow. Where possible, natural background loads will be distinguished from anthropogenic loads, and allocations will be provided for each. Where legacy mining loads are discrete and can be associated with specific sources (e.g. tailings), allocations may be provided at the individual source level.
- 2) TMDLs – TMDLs for metals are calculated using streamflow and established metals targets, and are expressed as concentration multiplied by flow. TMDLs will be written for consistent attainment of the most conservative target, whether chronic aquatic life criteria or drinking water standards, based on the assumption that consistently meeting these targets protects the other uses.
- 3) Target development – Water quality targets include state of Montana acute and chronic numeric metals criteria and EPA primary drinking water standards. Sediment quality may be used as a supplemental indicator. DEQ will use recent water quality data to estimate existing conditions and to evaluate attainment of water quality targets.
- 4) Final scope decision – Several metals listings are proposed for delisting due to non-impairment, and one listing is proposed for delisting due to lack of numeric criteria along with the change in pollutant loading conditions linked to remediation activity in the Cramer Creek watershed (described above in Section 2.6.3.).
- 5) Source assessment – Metals source assessments rely on: existing water quality data, and remediation records. Sources are well defined, and have been assessed and evaluated through DEQ & EPA remediation. Source assessments documentation will reference these reports and use this existing information to derive metals loads.
- 6) Data collection and compilation - DEQ's Monitoring and Assessment Section sampled the three waterbodies in 2011. This data is sufficient for TMDL development. Extensive water quality data and information related to DEQ remediation and site assessments exists, but has not been compiled (as of winter 2011/2012) into an electronic format. It is probable that not all of this information will need to be compiled, and the TMDLs will reference existing studies and data summaries.

SECTION FIVE –DOCUMENT COMPLETION TASKS

DEQ will publish the Bonita – Superior metals TMDLs in two documents: one for the Bonita area (Wallace and Cramer Creeks) and one for the Superior area (Flat Creek and Hall Gulch). A schedule of required tasks is included as **Attachment 1**.

- 1) **Watershed Descriptions**

These are summaries describing the physical, cultural and ecological context of the project area. These descriptions include information regarding local geology, geography, land use, ownership, climate, biology and more. These descriptions will be written by DEQ staff.
- 2) **Assessment Unit (AU) confirmation**

The project manager has confirmed that waterbody AUs in the project area are correct.
- 3) **Pollutant Specific Tasks**
 - i) **Data collection and compilation**

Current water quality conditions will be characterized using data collected by DEQ in 2011. This data has been compiled by DEQ's Monitoring & Assessment Section staff, who are using it to (re)evaluate impairment listings in the project area. Additional data characterizing historical conditions and likely source areas will come from DEQ Remediation Division records.
 - ii) **Source assessments**

The goal of this task is to identify and quantify pollutant loading from all of the potentially significant point and non-point sources within the project area. Likely sources within the project area include legacy mining impacts (adits or other diggings, waste rock, tailings) and natural geology.
 - iii) **Final scope determination**

DEQ's Monitoring & Assessment Section has proposed de-listing multiple pollutants due to non-impairment. Delisting barium and cobalt impairments for Cramer Creek is also proposed. Additionally, six new pollutant-waterbody combinations are proposed for listing.
 - iv) **Target development**

Targets are based on state chronic and acute aquatic life criteria and drinking water standards as defined by Montana's numeric water quality standards. Cobalt has no numeric criteria, and if a TMDL is pursued, targets will be developed using narrative criteria.
 - v) **TMDLs and allocations**

TMDLs and load allocations will be expressed as a daily load using the lowest applicable chronic aquatic life or human health targets values. This provides a margin of safety for chronic aquatic life standards that are otherwise based on a 96-hour average. One-hour time steps for acute criteria are also applicable standards and TMDL targets, and could be used as the basis for additional TMDL conditions in each stream. DEQ considers acute criteria TMDLs unnecessary since there are no MPDES-permitted point sources, and meeting the chronic conditions for diffuse sources is expected to satisfy all acute aquatic life protection requirements.
 - vi) **Compile source assessments, targets and comparison to existing conditions, TMDLs and allocations**

- vii) Develop an adaptive management approach, implicit margin of safety and seasonality sections consistent with other metals TMDL documents.
- viii) Stakeholder reviews of draft targets, TMDLs, allocations.
Draft source assessments, targets, TMDLs and allocations will be compiled for metals and placed on the DEQ TMDL website and/or discussed in meetings with the advisory group as necessary. Comments from the group will be considered and incorporated into the final TMDL document where appropriate.
- 4) TMDL document preparation and formatting
The draft TMDL document will include introductory sections (legislative background, watershed description, water quality standards, definition of TMDLs) as well as sections describing restoration strategies, follow-up monitoring, margin of safety (implicit), seasonality and adaptive management sections. All document formatting will comply with DEQ guidelines. Sections will be submitted to administrative staff as they are completed. Stakeholder review of these sections will likely be provided during the overall draft TMDL document review (Task 5).
- 5) Public comment on draft TMDL documents
The public will be provided an opportunity to review TMDL documents and provide comments to ensure consistency with the goals of the Montana Water Quality Act and Clean Water Act. After completion of the draft TMDL document, the public will likely have a 30-day comment period to review the document and submit comments. A public comment meeting will be held, or perhaps two, considering that local interest in the Flat Creek NPL site probably warrants a meeting in Superior. A final TMDL document will be prepared in consideration of public comment.
- 6) EPA Submittal of TMDL Documents
This task includes preparation of a submittal letter and summary table for the EPA to accompany the final document presented for EPA review. Also, this task considers time needed for actual printing, producing electronic copies, electronic, and EPA submittal of the document.

SECTION SIX – TMDL PROJECT MANAGEMENT FRAMEWORK AND OUTREACH STRATEGY

6.1 DEQ'S TMDL PROJECT MANAGEMENT FRAMEWORK

Each TMDL project area has an internal DEQ TMDL development team. The TMDL development team includes one planner designated as the DEQ project coordinator (PC) and a planner designated as the DEQ project manager (PM) for each pollutant category. The PC helps ensure a consistent stakeholder outreach approach and consistency where there is overlap in pollutant assessment methods. The PM is responsible for technical and administrative aspects of TMDL development for the assigned pollutant category including strategy implementation, stakeholder relations, and final TMDL document content and production. For some small projects, there may be only one project manager, and the project manager may have all project coordination responsibilities.

The project management team structure for the Bonita – Superior TPA is as follows:

Project Coordinator	Eric Sivers
Project Manager – Metals	Eric Sivers

Other DEQ personnel can play an important consultation role and possible TMDL development team role regarding point and non-point source impacts and pollutant reduction solutions. For the Bonita – Superior TPA, additional personnel and their anticipated roles are identified in the **Table 6-1** below.

Table 6-1: Bonita – Superior TPA Additional Project Personnel and their Roles

Personnel & DEQ Section	Role
Dean Yashan Watershed Management Section	Project Sponsor and TMDL Program Manager
Remediation Division Staff	Consult with PMs to evaluate loading and effects from abandoned mining sites
Water Quality Standards Staff	Provide technical advice on final target selections and standards application
Monitoring & Assessment Staff	Collected recent water quality data. Provide assessment decisions: delisting due to non-impairment or new listings due to impairment
Watershed Management Section Staff	Staff involved with similar TMDL work will provide document peer review
Water Quality Planning Bureau Administrative Support	Compile draft and final TMDL documents Provide assistance with public comment process

6.2 STAKEHOLDER AND OUTREACH STRATEGY

The DEQ will implement the stakeholder and public involvement strategy as defined below. A spreadsheet of the watershed advisory group (WAG), technical advisory group (TAG), and interested parties can be found in **Attachment 2**. Given the small scope of this project, WAG and TAG will probably be considered one group for coordination and meetings. The list of interested parties may grow as the planning process continues.

Watershed Advisory Group – DEQ has requested that representatives of applicable interest groups work with the DEQ and the Missoula and Mineral County Conservation Districts (CDs) and in an advisory capacity consistent with State Law (75-5-703 & 704). Comment opportunities will be obtained from the WAG at varying stages of TMDL development, including opportunities for TMDL draft document review prior to the public comment period. During TMDL development, meetings or other forms of interaction will be pursued when appropriate to obtain timely WAG advice and comments. The DEQ Project Coordinator, Eric Sivers, is responsible for WAG formation, and is the primary DEQ contact regarding WAG meeting coordination. Outreach and coordination assistance will also be provided by the Watershed Restoration Council.

The WAG provides advice and comment during TMDL development; they do not have TMDL decision making authority. Therefore, there is no need for a WAG chairman or similar formalities.

Technical Advisory Group – The TAG will be composed of persons knowledgeable about scientific issues, processes, and sampling design, as well as familiarity with the project area. Individuals may include representatives from State and Federal agencies, local resource professionals, or members of local government, including CD members. The DEQ Project Coordinator, Eric Sivers, will work together to coordinate all TAG interactions and meetings during TMDL development.

The TAG provides technical advice and comment during TMDL development for components such as water quality assessments and sampling designs. The DEQ maintains responsibility for technical decisions applied toward TMDL development.

Interested Parties - Interested parties are those who have chosen or requested to be informed and/or involved in the TMDL process. The DEQ Project Coordinator will add them to a distribution list to be kept informed of public meetings. Interested parties will also receive general TMDL schedule updates to be kept aware of project progress and completion status.

Anyone interested in the Bonita – Superior metals TMDLs may request to be added to the interested parties list by contacting the DEQ Project Coordinator or Project Managers, or via the DEQ TMDL website for this project. For all TMDLs developed, a public meeting will be held during the public comment period of document completion. All advisory group members, CD members, and known interested parties will be notified of these meetings. Public notices will also be posted in local newspapers, on the DEQ web site, and the DEQ TMDL project website.

SECTION SEVEN – IMPLEMENTATION DETAILS

This section lists the anticipated planning documents for the project. Planning documents include this plan, modeling reports and sampling and analysis plans (SAP). The status of each item, at the time of this project plan approval, is noted in parenthesis.

7.1 – METALS

Planning Documents

1. Project plan [complete]
2. Metals Sampling and Analysis Plan [complete]
3. Monitoring & Assessment Section decision tables [in progress]

Deliverables

1. TMDL Document for Wallace & Cramer Creeks Metals [in progress]
2. TMDL Document for Flat Creek & Hall Gulch Metals [in progress]

SECTION EIGHT – QUALITY ASSURANCE REPORTING

This section describes quality assurance (QA) measures and reporting for each pollutant. The primary focus of the data quality analysis will be to ensure the data has sufficient quality to minimize errors in decision making.

All sampling and analysis plans (SAPs) address the appropriate QA and quality control (QC) measures identified under the Bureau's Quality Management Plan (DEQ 2008). QA/QC methods are consistent with those defined in the Water Quality Management Bureau's Quality Assurance Project Plan (QAPP) for Sampling and Water Quality Assessment of Streams and Rivers in Montana (DEQ 2005) and are approved and tracked by the QA Officer. All SAPs describe their data quality objectives and data quality indicators and include measures for assessing them.

Laboratory analysis for nutrient and metal samples is completed by State-approved labs adhering to DEQ protocols and reporting requirements for analytical data (DEQ 2009). QA/QC reviews are included as part of all sediment, temperature, nutrient, and metal SAPs, modeling efforts, and respective scopes of work. DEQ Project Managers review all field and laboratory data, QA/QC reports, data quality summaries, modeling outputs, and final reports for quality and usability of data, accuracy, and completeness. All SAPs are tracked by the Bureau's Quality Assurance Program. Laboratory data is stored within EPA's National STORET data system.

SECTION NINE – PLAN MODIFICATION SUMMARY

This section will be used to document future plan modifications if needed.