



State of Mississippi

TATE REEVES
Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

April 1, 2026

Ms. Kim Moreland
Moreland Holdings, LLC
448 Highway 12 West
Starkville, Mississippi 39759

Dear Ms. Moreland:

Re: Moreland RV Park Phase 3
Oktibbeha County
COE No. SAM-2023-00965
WQC No. WQC2025005

Pursuant to Section 401 of the Federal Water Pollution Control Act (33 U. S. C. 1251, 1341), the Mississippi Department of Environmental Quality (MDEQ) issues this Certification, after public notice and opportunity for public hearing, to Moreland Holdings, LLC, an applicant for a Federal License or permit to conduct the following activity:

Moreland Holdings, LLC: The applicant is requesting after-the-fact authorization to retain unauthorized discharge of fill material into approximately 1.81 acres of waters of the United States (U.S.). Specifically, the unauthorized impacts involve the discharge of fill material into 1.81 acres of emergent wetlands (W-1) for site grading associated with construction of RV pads, roads and a detention basin. According to the applicant, avoidance of wetlands is problematic due to the existing location of the Moreland RV Park and the work being associated with expanding the RV park. The applicant designed the proposed project to avoid discharging fill material into 0.6 acre of the existing 2.41-acre emergent wetland. The applicant proposes to purchase wetland mitigation credits from an approved mitigation bank [SAM-2023-00965; WQC2025005].

MDEQ certifies that the above-described activity will be in compliance with the applicable provisions of Sections 301, 302, 303, 306, and 307 of the Federal Water Pollution Control Act

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and Section 49-17-29 of the Mississippi Code of 1972, if the applicant complies with the following conditions:

1. The facility shall connect to an MDEQ approved wastewater collection and treatment system. All wastewater, including process wastewater, shall be properly treated and disposed in accordance with 11 Mississippi Administrative code Part 6, Chapter 1. (Statement G) (11 Miss. Admin. Code Pt. 6, R. 1.1.1.B)
2. All fill material and excavation areas shall have side slopes of 3:1 (horizontal:vertical) or flatter and shall be immediately seeded, stabilized and maintained. (Statement B) (11 Miss. Admin. Code Pt. 6, R. 1.1.1.B.)
3. Appropriate best management practices (BMPs) shall be properly installed and maintained to prevent the movement of sediment off-site and into adjacent drainage areas. Special care shall be taken prior to and during construction to prevent the movement of sediment into adjacent avoided wetland areas. In the event of any BMP failure, corrective actions shall be taken immediately. (Statement F) (11 Miss. Admin. Code Pt. 6, R. 1.1.1.B.)
4. Coverage under a Stormwater Construction General NPDES Permit shall be obtained. No construction activities shall begin until such approvals are obtained. (Statement F) (11 Miss. Admin. Code Pt. 6, R. 1.1.1.B)
5. The post-construction stormwater management plan prepared by Springer Engineering and submitted by Headwaters, Inc. on October 30, 2025 shall be implemented concurrent with project construction and maintained as proposed. (Statement F) (11 Miss. Admin. Code Pt. 6, R.1.3.4.A (9))
6. Mitigation for the impacts of 1.81 acres of emergent wetlands shall be provided by the purchase of mitigation credits from an approved mitigation bank. The number of credits must be in accordance with banking prospectus and be based upon that required for impacting 1.81 acres of emergent wetlands. Written verification of credit purchase must be provided to MDEQ within 60 days of purchase. (Statement E) (11 Miss. Admin. Code Pt. 6, R 1.3.4 A (2))
7. Turbidity outside the limits of a 750-foot mixing zone shall not exceed the ambient turbidity by more than 50 Nephelometric Turbidity Units. (Statement A) (11 Miss. Admin. Code Pt. 6, R.2.2.A.(3))
8. No sewage, oil, refuse, or other pollutants shall be discharged into the watercourse. (Statement A) (11 Miss. Admin. Code Pt. 6, R. 2.2.A.(3))

As part of the Scope of Review for Application Decisions, 11 Mississippi Administrative Code Part 6, Rule 1.3.4(B), the above conditions are necessary for MEQ to ensure that appropriate measures will be taken to eliminate unreasonable degradation and irreparable harm to waters of the State, such that the activity will not meet the criteria for denial:

- (A) The proposed activity permanently alters the aquatic ecosystem such that water quality criteria are violated and/or it no longer supports its existing or classified uses. An example is the channelization of streams.
- (B) There is a feasible alternative to the activity which reduces adverse consequences on water quality and classified or existing uses of waters of the State.
- (C) The proposed activity adversely impacts waters containing State or federally recognized threatened or endangered species.
- (D) The proposed activity adversely impacts a special or unique aquatic habitat, such as National or State Wild and Scenic Rivers and/or State Outstanding Resource Waters.
- (E) The proposed activity in conjunction with other activities may result in adverse cumulative impacts.
- (F) Nonpoint source/storm water management practices necessary to protect water quality have not been proposed.
- (G) Denial of wastewater permits and/or approvals by the State with regard to the proposed activities.
- (H) The proposed activity results in significant environmental impacts which may adversely impact water quality.

MDEQ also certifies that there are no limitations under Section 302 nor standards under Sections 306 and 307 of the Federal Water Pollution Control Act which are applicable to the applicant's above-described activity.

This certification is valid for the project as proposed. Any deviations without proper modifications and/or approvals may result in a violation of the 401 Water Quality Certification. If you have any questions, please contact Carrie Barefoot.

Sincerely,



Becky Simonson
Chief, Environmental Permits Division

cc: Samantha Rhoades, U.S. Army Corps of Engineers, Mobile District
Jamie Becker, Environmental Protection Agency
Dillon Easley, Headwaters, Inc.
Jennifer Deignan, MDEQ Contractor