



NPDES Compliance Inspection Report

Preserve at Illahee Springs

NPDES Permit Tracking Number
WAR306947

Inspection Dates: 01/28/2021 & 02/11/2021

Prepared by:

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Inspector Signature/Date:

JON KLEMESRUD

Digitally signed by JON KLEMESRUD
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Supervisor Signature/Date:

PETER CONTRERAS

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- **Contents**

I.	<u>Project Information</u>	3
II.	<u>Inspection Information</u>	4
III.	<u>Permit Information</u>	5
IV.	<u>Project Background</u>	5
V.	<u>Inspection Chronology</u>	6
VI.	<u>Site Review</u>	8
VII.	<u>File Review</u>	9
VIII.	<u>Areas of Concern</u>	10
A.	<u>BMP Implementation and Maintenance Documentation</u>	10
B.	<u>Timely Maintenance of BMPs</u>	11
C.	<u>Benchmark Exceedances</u>	12
IX.	<u>Closing Conference</u>	12

ATTACHMENT A – Aerial Image (Google Earth)

ATTACHMENT B – Photograph Log

ATTACHMENT C – Email Correspondence

ATTACHMENT D – Area/Landscape Map

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Jeff Kreckman, Mike Dunne, LJ Elliott, Chris Sita or from observations made during the inspection.]

I. Project Information

Project Name:	Preserve at Illahee Springs
Project Location:	700 NE McWilliams Road Bremerton, WA 98311
Latitude/Longitude:	N 47.622202 W -122.621792
NPDES Tracking Number:	WAR306947
Project Nature:	New construction, development of approximately 152 multi-family homes and associated utilities and access roads.
Owner/Operator/Permittee:	McWilliams Road LLC 1245 Auburn Way North #298 Auburn, Washington 98002 <i>(Responsibilities include operational control over plans and specifications and overall site management).</i>
Permittee Contact(s):	Jeff Kreckman, Project Manager McWilliams Road LLC (253) 864-6400 jeff@summitproperty.com Marilea Kalvog, Contracts Administrator McWilliams Road LLC (253) 864-6400 marilea@summitproperty.com Beau Harer, Permittee/Ownership Member McWilliams Road LLC (206) 499-879 beauharer@lakeshorecommunities.com Mike Dunn (206) 295-1744 mike@summitproperty.com
Contractor #1:	Prospect Construction Inc. 116 23 rd Street SE Puyallup, WA 98372 <i>(Responsibilities includes on-site construction activities and installation and maintenance of BMP's (as directed)).</i>

Represented on-site by: LJ Elliott, Civil Foreman
Prospect Construction, Inc.
(253) 446-1600 lelliott@prospectconst.com

Contractor #2: Sita Enterprises
(Responsibility includes performing construction activities and installation and maintenance of BMP's (as directed)).

Represented on-site by: Chris Sita
Sita Enterprises

Contractor #3: O'Neill Service Group (OSG Environmental)
17619 NE 68th Ct. Suite 100
Redmond, WA 98052
(425) 429-7800
(Responsibilities includes initial development of the SWPPP and weekly CESCL site inspections).

Inspection Contact: Isabel Mendoza, Environmental Scientist
OSG Environmental
(509) 398-6404

Project Start Date: Fall 2018

Total Disturbed Area: 22.6 acres

Receiving water(s): Kitsap County municipal stormwater system
and ultimately the Dyes Inlet of Puget Sound.

II. Inspection Information

Inspection Dates: January 28, 2021 and February 11, 2021

Inspector(s): Jon Klemesrud, Inspector
EPA Region 10, ECAD / FDDWES

Other individuals present: Maria Zeman, Compliance Inspector
Water Quality Program, NW Regional Office
Washington Department of Ecology

Arrival Time (approx.): 10:15 AM (01/28/21) & 9:30 AM (02/11/21)

Departure Time (approx.): 2:30 PM (01/28/21) & 12:30PM (02/11/21)

Weather: Light Rain (01/28/21), Cloudy (02/11/21)

Purpose: To evaluate compliance with the requirements of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) and the State Waste Discharge General Permit for stormwater discharges associated with construction activity (Construction Stormwater General Permit).

III. Permit Information

The Preserve at Illahee Springs development is permitted to discharge stormwater under the State of Washington Department of Ecology's Construction Stormwater General Permit (CGP) with the tracking number WAR306947. The CGP at the time of inspection became effective January 1, 2021, with the expiration date of December 31, 2025. The project received permit coverage under the previous iteration of the Permit, effective October 1, 2018. The initial Notice of Intent (NOI) (for permit coverage) was submitted on August 10, 2018 by Beau Harer of McWilliams Road LLC. The NOI was last updated on April 13, 2020 for continued coverage under the 2021 CGP.

On January 5, 2021 the permittee submitted a partial transfer of permit coverage as 6.5 acres was transferred to homebuilder SSHI, LLC dba D.R. Horton. According to the project's Stormwater Pollution Prevention Plan (SWPPP), transferred areas include Phase 1 lots, 1, 2, 5 through 20, and 25 through 40.

IV. Project Background

According to the project's SWPPP, the Preserve at Illahee Springs project is the development of a 29.1-acre property into 152 multi-family urban lots. The project includes the demolition of two existing structures, removal of vegetation, and construction of residential dwellings, private roads, utilities, and stormwater treatment and detention control facilities. There are three phases of the housing development. The project is located along the north side of NW McWilliams Road, west of Highway 303 near northern edge of Bremerton, WA. For a project footprint, see **Attachment A**, Aerial Image.

At the time of the inspection, the project manager for the development was Jeff Kreckman representing the owner/permittee McWilliams Road, LLC. Prospect Construction, Inc. was operating as the primary construction contractor and was represented on-site by Civil Foreman LJ Elliott. Sita Enterprises was also a contractor on-site and was represented by Chris Sita.

According to the Washington Department of Ecology's Water Quality Permitting and Reporting Information System (PARIS), Washington Department of Ecology (Ecology) inspected the site for permit compliance on October 16, 2019 and January 9, 2020.

V. Inspection Chronology

The inspection of the Preserve at Illahee Springs project occurred on two separate dates, January 28, 2021 and February 11, 2021. Arrival on January 28th was unannounced, the inspection consisted of an opening conference, a site walk-through and a closing conference. Permit related records were not accessible on January 28th, therefore a follow-up inspection was scheduled in advance for February 11th. The follow-up inspection included an opening conference, site-tour, records review, and a closing conference.

At approximately 9:00AM on January 28, 2021, I called and left a voicemail with Beau Harer, Mr. Harer was listed as the site contact on the initial NOI, representing the project owner and permittee McWilliams Road LLC. At this time I also called and left a voicemail with Jeff Kreckman of McWilliams Road LLC, Mr. Kreckman was the on-site representative during previous inspections conducted by Ecology.

At approximately 10:15AM, I arrived on-site with Ecology inspector Maria Zeman, we parked at the main entrance near the site's office trailer. With nobody present at the office trailer, I made an additional attempt to call both Mr. Harer and Mr. Kreckman. I also called and left a voicemail with Marilea Kalvog who was listed as a permittee contact on the recent partial transfer of permit coverage.

As Ms. Zeman and I waited at our vehicles, I received a call back from Mr. Harer, I introduced myself and further explained my voicemail message that I was hoping to conduct an on-site inspection for CGP compliance that morning with Ecology. I explained that Ms. Zeman and I had arrived at the construction site and were unable to locate an on-site representative. Mr. Harer stated that he was in a meeting in Seattle and that Mr. Kreckman and Ms. Kalvog are the on-site contacts. He further stated that he would make a phone call to arrange for someone to assist us for the inspection.

Following my discussion with Mr. Harer, I received a phone call from Mike Dunne, Mr. Dunne stated that he had received a call from Mr. Harer to help facilitate my inspection request. Mr. Dunne stated that he was representing the ownership/permittee and had been informed that Project Manager Mr. Kreckman had suffered a medical emergency earlier in the week and therefore was unable to be on-site that day. He stated that Ms. Kalvog was also not available due to a medical appointment. I asked Mr. Dunne if I could conduct a walk-through while on-site and then follow-up at a later time/date to address any questions. Mr. Dunne approved my request and stated that he would arrange for on-site contractor Chris Sita to meet us at our vehicles to assist us in the inspection. We were approved access to all portions of the site and were allowed to inspect and photograph all areas requested.

Shortly after my phone call with Mr. Dunne, we met with Mr. Sita as he walked from an active portion of the construction site. We exchanged introductions and I presented my inspector credentials and offered him my business card. We discussed the purpose and expectations of my visit, Mr. Sita stated that he would walk the site with us but didn't

have access to the office trailer where the Stormwater Pollution Prevention Plan (SWPPP) and other records were likely kept. We began the walk-through near the southwest corner. See **Attachment B**, for a photograph log including pictures taken during the January 28, 2021 walk-through.

Following the site-tour, a brief closing conference was held with Mr. Sita where I discussed my inspection observations with him and thanked him for his assistance. I then called Mr. Dunne to inform him that we finished the site tour and discussed my inspection observations to him as well. I notified him that Ms. Zeman and I would now be leaving the site and would follow-up at a later date to schedule a time to review permit related documents that were likely inside the office trailer. He requested that I send him an email discussing my observations so that he could then distribute to Mr. Kreckman and other appropriate contacts. Per his request, after leaving the site I sent Mr. Dunne an email outlining the day's inspection activities and observations, see **Attachment C**, Email Correspondence.

The following Wednesday (February 3, 2021) I spoke with Mr. Kreckman via phone, he stated that he had received my inspection observations and just conducted his weekly walkthrough of the site with the project's environmental consultant. He mentioned that he had addressed some items I had identified in my initial walkthrough. We agreed to meet at the site (along with Ms. Zeman) on February 11, 2021 at 9:30AM to review the SWPPP and other permit related records that were not accessible during our prior visit. We also planned to conduct another site walk-through.

The morning of February 11, 2021 visit, I received a voicemail from Mr. Kreckman at approximately 8:45AM. Mr. Kreckman stated that he wasn't going to be on-site that morning as a winter storm advisory was in effect for that afternoon and he wanted to avoid any travel issues. I called Mr. Kreckman and stated I still wished to conduct the follow-up inspection, he then arranged to have his project superintendent who was on-site open the office trailer so we would have access to the SWPPP and arranged to have contractor LJ Elliott of Prospect Construction Inc. accompany Ms. Zeman and I on the follow-up site tour. I informed him that I would follow-up with him after our inspection for a closing conference.

I arrived on-site at approximately 9:30AM, Ms. Zeman arrived a few minutes later and we met with Mr. Elliot. We exchanged introductions and I presented my inspector credentials. We and discussed the purpose and expectations of our visit and began the walk-through near the main entrance. See **Attachment B**, for a photograph log including pictures taken during the February 11, 2021 walk-through.

Following the walk-through with Mr. Elliot, we thanked him for his assistance and then Ms. Zeman and I continued to the office trailer where we reviewed the SWPPP which included weekly site inspections and monitoring records. A closing conference was held via phone with Mr. Kreckman prior to leaving the site where I discussed my inspection observations and discussed EPA's follow-up procedures. I left a business card and EPA's Small Business Resources Information Sheet on Mr. Kreckman's desk.

VI. Site Review

At the time of inspection, all three phases of the housing development had been cleared of vegetation and were generally engaged in active construction. Some of the Phase 1 homes appeared to be nearing the end of construction and some Phase 1 lots appeared empty but prepared and stabilized (**Photo 18**). Phase 1 is generally located within the southwest corner of the development, access to this area and the project's office trailer is from a paved entrance off of NE McWilliams Road near the southwest corner of the development.

Phase 2 is generally located along the southeast portion of the development and Phase 3 located along the northern portion. Construction access to Phase 2 and Phase 3 is from an unpaved second entrance along NE McWilliams Road, east of the of Phase 1 entrance. No off-site tracking was observed. See **Attachment D**, for a photo of the Area/Landscape Map.

During our site tour on January 28, 2021, I observed dry and wet utilities installed along the southern areas of Phase 2, sidewalks and curbing had recently been installed (**Photo 14**). Phase 3 had yet to be graded and material was actively being moved. Phase 3 areas were generally used for stockpiling material and were being prepped for wet utility installation (**Photo 8 and Photo 9**). Slopes for one of the Phase 2/3 stormwater detention ponds appeared to be recently graded (**Photo 10**). During our site tour on February 11, 2021, additional sidewalks and curbing had been installed within the Phase 2 area. Curbing had also extended into portions of the Phase 3 area, it also appeared that wet utilities were being installed in some Phase 3 areas.

Stormwater was contained on-site by approximately four detention/infiltration ponds. Stormwater from the Phase 1 areas is generally routed to a large permanent detention pond located in the southwest area of the development (**Photo 1 and Photo 2**). According to Mr. Kreckman the pond within Phase 1 is equipped with a discharge pipe that is no longer in use after consultation with Kitsap County.

Stormwater from Phase 2 areas is routed or conveyed to two detention ponds, one is a smaller pond located along the souther perimeter (**Photo 15**) and the other is a larger pond located in the northeast corner of the development (**Photo 10**). Stormwater from the Phase 3 area was being collected in a temporary pond that will later be reconstructed as part of the final design (**Photo 3**).

At the time of inspection, stormwater from each of the ponds was being infiltrated or pumped as needed to a detention basin in the northwest corner of the development (**Photo 4**). From the detention basin, stormwater is pumped through a contracted Clear Water Services on-site stormwater treatment system (**Photo 7 and Photo 26**). According to the SWPPP, the treatment is a Chemically Enhanced Sand Filtration (CESF) system. According to Mr. Sita and Mr. Elliot the treatment system is staffed/managed by Clear Water Services.

After receiving treatment through the CESF system, stormwater is piped directly to project's permitted outfall (Outfall 1) which is a manhole connected to the Kitsap County municipal stormwater system (**Photo 5 and Photo 6**). According to the NOI the ultimate receiving water is the Dyes Inlet of Puget Sound.

According to the SWPPP, the CESF system monitors treatment effluent turbidity and pH on a real-time basis and records 15-minute time weighted averages for flow, pH and turbidity. Effluent sampling data reports from the CESF system are prepared and reviewed on a weekly basis and stored onsite. A monthly summary report is also generated for reporting purposes and stored within the SWPPP binder.

According to the January 9, 2020 Ecology inspection report reviewed on PARIS, chemical treatment was approved on January 2, 2020 to address turbidity benchmark exceedances that occurred in January 2019 and December of 2019.

Weekly site inspections are conducted and documented by contracted Certified Erosion and Sediment Control Lead (CESCL) staff from O'Neill Service Group (OSG Environmental). According to Mr. Kreckman, he generally will accompany OSG representative on a full walk-through each Wednesday. Inspection reports prepared by OSG Environmental are stored within the SWPPP binder.

Some examples of Best Management Practices (BMP's) listed in the SWPPP and observed during both walk-throughs included silt fencing along the downslope perimeters (**Photo 1 and 8**) interceptor dikes and swales (**Photo 13 and 21**), check dams (Photo 12 and 23), permanent and temporary stabilization practices (**Photo 5 and Photo 17**), protected slopes, covered stockpiles (Photo 14), sediment ponds and the on-site treatment system.

According to Mr. Sita, BMP implementation maintenance is performed by on-site personnel such as himself as needed/directed.

VII. File Review

Following the site walk-through on February 11, 2021, Ms. Zeman and I reviewed the projects SWPPP binder inside the office trailer with the approval of Mr. Kreckman. The following records were included within the SWPPP binder:

- Stormwater Pollution Prevention Plan (SWPPP) – According to narrative contained in the SWPPP, the SWPPP was prepared by OSG Environmental and had documentation of four revisions. Most recently the SWPPP was revised on 01/27/2021, updates were made to include reinstatement of the CESF system, release of Phase 1 lots to DR Horton, and removal of COVID-19 Stay-at-Home Order protocols.
- SWPPP Site Map – the SWPPP contained two site maps, one was labeled the Demolition and T.E.S.C. Plan and the other appeared to be a proposed landscape/lot map.

- Weekly site inspection reports were contained within the SWPPP. Reports were completed weekly by either Samantha Harrison or Isabel Mendoza of OSG Environmental. Both Ms. Harrison and Ms. Mendoza were listed as members of the Pollution Prevention Team within the SWPPP including their contact information.
- Effluent sampling reports from the on-site treatment system were also included in the SWPPP binder.
- Prior to the inspection, Discharge Monitoring Reports (DMRs) were reviewed via Ecology's Water Quality Permitting and Reporting Information System (PARIS). I reviewed months going back to the last Ecology inspection which occurred in January of 2020 as well as DMR's going back to January 2019.

VIII. Areas of Concern

Observations during the inspection identified the following areas of concern:

A. BMP Implementation and Maintenance Documentation.

Section S4.A. of the CGP states that "the permittee must maintain a site log book that contains a record of the implementation of the SWPPP and other permit requirements, including the installation and maintenance of BMPs, site inspections and stormwater monitoring."

Section S4.B. of the CGP states that "site inspections must include all areas disturbed by construction activities, all BMPs, and all stormwater discharge points under the Permittee's operational control." "2. Based upon the results of the inspection, the permittee must correct the problems identified by: c. documenting BMP implementation and maintenance in the site log book."

Section S4.C.5.a.iii. of the GCP, within the Turbidity/Transparency Benchmark Values and Reporting Triggers, states that the permittee must "document BMP implementation and maintenance in the site log book."

During the file review on February 11th, 2021, I did not observe a dedicated site log book documenting the installation and maintenance of BMPs. Weekly inspection reports completed by OSG Environmental staff contained notes regarding observations of BMP installation and maintenance, but I did not observe any records being kept by on-site personnel of when BMP installation and maintenance occurred on-site.

I explained the permit requirement to Mr. Kreckman via phone during the file review while reviewing the SWPPP binder. I also explained the importance of documenting when BMP installation and BMP maintenance occurs to ensure compliance with the permit.

B. Timely Maintenance of BMPs

***Section S4.B.2** of the CGP states that “the CESCL or inspector must examine stormwater visually for the presence of suspended sediment, turbidity, discoloration, and oil sheen. BMP effectiveness must be evaluated to determine if it is necessary to install, maintain, or repair BMPs to improve the quality of stormwater discharges. Based on the results of the inspection, the Permittee must correct the problems identified by a. Reviewing the SWPPP for compliance with Special Condition S9 and making appropriate revisions within 7 days of the inspection. b. Immediately beginning the process of fully implementing and maintaining appropriate source control and/or treatment BMPs, within 10 days of the inspection. c. Documenting BMP implementation and maintenance in the site log book.”*

At the time of inspection, during our site walk-through on January 28, 2021, I observed a conveyance channel along the east perimeter to be in need of maintenance (**Photo 11**), it appeared that the sediment had built up and some of the rock check dams had failed. I notified Mr. Sita and Mr. Dunne of this observation during our closing conferences, I also included the observation in my email correspondence to Mr. Dunne following my January 28, 2021 walk-through inspection (**Attachment C**).

During my file review on February 11, 2021, when reviewing a January 3, 2021 Inspection Report completed by Samantha Harrison of OSG Environmental, I observed a note stating “-conveyance ditch along east perimeter has build up of sediment. Recommend removing excess sediment, lining with geotextile/plastic, and reinstalling check dams.” Within the inspection report the status of the Stabilize Channels and Outlets BMP Designation was checked “Not OK.”

The concern is that the BMP issue was identified by the contracted CESCL inspector on January 13, 2021 and had not been addressed within 10 days of discovery as observed and documented during my January 28, 2021 inspection. I returned to this area during my walk-through on February 11, 2021, it appeared sediment had been removed and check dams had been reinstalled (**Photo 23**).

In addition to the conveyance channel, during the on-site walk-through on January 28, 2021 I observed an unstabilized area along the southern fence line. It appeared that stormwater had caused some channeled erosion (**Photo 16**) and could contribute to sediment entering a southern detention pond. I notified Mr. Sita and Mr. Dunne of this observation during our closing conferences. I also included the observation in my email correspondence to Mr. Dunne following my January 28, 2021 walk-through inspection (**Attachment C**).

During my site walk through on February 11, 2021 it appeared that maintenance had not occurred to address this area I had identified (**Photo 19 and Photo 20**).

C. Benchmark Exceedances

Section S4.C.5. of the CGP states that the benchmark value for turbidity is 25 NTUs or less.

Discharge Monitoring Report (DMR) data on Ecology's Water Quality Permitting and Reporting Information System (PARIS) indicates that the site has reported three benchmark exceedances since the last Ecology Inspection on January 9, 2020. The exceedances were reported as 559 NTUs on January 22, 2020, 50.2 NTUs on December 22, 2020 and 46.5 NTUs on December 23, 2020.

In addition to the three exceedances mentioned above, my review of the January 2019 – January 2020 DMRs noted the following benchmark exceedances:

Reported Benchmark Value	Date
318 NTUs	2/20/2019
158 NTUs	2/21/2019
3000 NTUs	2/22/2019
123 NTUs	2/23/2019
56.7 NTUs	2/24/2019
335 NTUs	10/23/2019
399 NTUs	11/20/2019
3000 NTUs	12/20/2019
142 NTUs	1/22/2020

IX. Closing Conference

Following the walk-through and file review on February 11, 2021, a closing conference was held with Mr. Kreckman via phone where I discussed my observations and areas of concern. I then thanked him for his time and cooperation.

ATTACHMENT A

Aerial Image (Google Earth)



ATTACHMENT B

Photograph Log

All photographs taken by Jon Klemesrud on January 28th, 2021 and February 11th 2021 (as noted).

Nikon Coolpix AW100

Photo Log- Preserve at Illahee Springs



Photo #:01 (DSCN2018)

Description: Facing south from along the southwest perimeter of the site, photo of the stormwater detention pond serving the Phase 1 area and silt fencing installed along the site perimeter. Stormwater is pumped from the pond to the on-site treatment system and then discharged.



Photo #:02 (DSCN2019)

Description: Facing south along the southwest perimeter, photo of the stormwater detention pond serving the Phase 1 area. Stormwater is pumped from the pond to the Phase 3 on-site treatment system and then discharged.



Photo #:03 (DSCN2020)

Description: Facing southeast from the northwest corner of the site, photo of the Phase 3 area and hose that conveys stormwater from the southwest detention pond.



Photo #:04 (DSCN2021)

Description: Facing north from the northwest corner of the site, photo of the temporary detention pond that receives pumped stormwater from the Phase 1 area and then feeds the stormwater treatment system prior to discharge.

Photo Log- Preserve at Illahee Springs



Photo #:05 (DSCN2022)

Description: Facing west from the northwest corner of the site, photo of the temporary stabilized area within Phase 3 and stormwater discharge pipe from the on-site treatment system.



Photo #:06 (DSC2023)

Description: Facing south, photo of the site's discharge pipe entering the on-site Kitsap Country stormwater system manhole.



Photo #:07 (DSCN2024)

Description: Facing east from the northwest corner of the site, photo of the Clear Water Services on-site treatment system.



Photo #:08 (DSCN2025)

Description: Facing east, photo showing silt fencing along the northern perimeter within the Phase 3 area.

Photo Log- Preserve at Illahee Springs



Photo #:09 (DSCN2026)

Description: Facing west from the northern perimeter within the Phase 3 area, photo of the temporary stockpiles. Some of the stockpiles were covered with plastic sheeting and some were active at the time of inspections.



Photo #:10 (DSC2027)

Description: Facing south from the northeast corner of the site, photo of a temporary holding pond for stormwater collecting along the eastern perimeter.



Photo #:11 (DSCN2028)

Description: Facing north from the eastern perimeter, photo of the northern portion of a stormwater conveyance channel that runs along the eastern perimeter. This portion of the channel and associated check dams appeared to be in need of maintenance.



Photo #:12 (DSCN2029)

Description: Facing south from the eastern perimeter, photo of the southern portion of a stormwater conveyance channel that runs along the eastern perimeter. This portion of the channel was observed to be bare and unlined.

Photo Log- Preserve at Illahee Springs



Photo #:13 (DSCN2030)

Description: Facing east from within the Phase 2 area, photo of the beginning of the stormwater conveyance channel that intercepts and runs along the eastern perimeter.



Photo #:14 (DSC2031)

Description: Facing south from within the central area of the site, photo of curbing and walkways recently completed. Stockpiles in this area were generally covered.



Photo #:15 (DSCN2032)

Description: Facing north, photo of a stormwater detention pond located along the southern perimeter of the site. The Pond receives stormwater from the southern portion of the Phase 2 area.



Photo #:16 (DSCN2033)

Description: Facing east, photo of the unstabilized area along the southern perimeter fence line. Channelized erosion was observed in the direction of a stormwater detention pond.

Photo Log- Preserve at Illahee Springs



Photo #:17 (DSCN2034)
Description: Facing east, photo of the stabilized areas near the southwest corner of the development.



Photo #:18 (DSCN2035)
Description: Facing north, photo of the Phase 1 area just east of the main entrance.



Photo #:19 (DSCN2045)
Description: Facing east, photo of the unstabilized area along the southern fencing line. Photo taken on 02/11/21.



Photo #:20 (DSC2046)
Description: Facing east, photo of the unstabilized area along the southern perimeter fence line. Channelized erosion was observed in the direction of a stormwater detention pond. Photo taken on 02/11/21.

Photo Log- Preserve at Illahee Springs



Photo #:21 (DSCN2047)

Description: Facing east from within the Phase 2 area, photo of the beginning of the stormwater conveyance channel that runs along the eastern perimeter. Photo taken on 02/11/21.



Photo #:22 (DSC2048)

Description: Facing south from the eastern perimeter, photo of the southern portion of a stormwater conveyance channel that runs along the eastern perimeter. This portion of the channel was observed to be bare and unlined. Taken 02/11/21



Photo #:23 (DSCN2049)

Description: Facing north from the eastern perimeter, photo of the northern portion of a stormwater conveyance channel that runs along the eastern perimeter. Photo taken on 02/11/21.



Photo #:24 (DSCN2050)

Description: Facing west from the northwest corner of the site, photo of the temporary stabilized area within Phase 3 and stormwater discharge pipe from the on-site treatment system. Photo taken 02/11/21.

Photo Log- Preserve at Illahee Springs



Photo #:25 (DSCN2051)

Description: Facing southeast, photo of tote staged near the on-site treatment system. Photo taken 02/11/21.



Photo #:26 (DSC2052)

Description: Facing north, photo of the on-site treatment system. Photo taken on 02/11/21.



Photo #:27 (DSCN2053)

Description: Facing east, photo of the on-site treatment area along the northern edge of Phase 3 area. Photo taken on 02/11/2021.



Photo #:28 (DSCN2075)

Description: Facing northeast, photo taken from McWilliams Road of the stabilized area southwest of the detention pond serving the Phase 1 area. Photo taken on 02/11/2021.

Complete list of photographs taken:

- DSCN2018– Facing south, taken along the southwest perimeter of the site. Photo of the stormwater detention pond serving the Phase 1 area and silt fencing installed along the site perimeter. Stormwater is pumped from the pond to the on-site treatment system and then discharged.
- DSCN2019 Facing south, taken along the southwest perimeter. Photo of the stormwater detention pond serving the Phase 1 area. Stormwater is pumped from the pond to the Phase 3 on-site treatment system and then discharged.
- DSCN2020 – Facing southeast, from the northwest corner of the site. Photo of the Phase 3 area and hose that conveys stormwater from the southwest detention pond.
- DSCN2021 – Facing north, taken from the northwest corner of the site. Photo of the temporary detention pond that receives pumped stormwater from the Phase 1 area and then feeds the stormwater treatment system prior to discharge.
- DSCN2022 – Facing west from the northwest corner of the site, photo of the temporary stabilized area within Phase 3 and stormwater discharge pipe from the on-site treatment system.
- DSCN2023 – Facing south, photo of the site’s discharge pipe entering the on-site Kitsap County stormwater system manhole.
- DSCN2024 – Facing east from the northwest corner of the site, photo of the Clear Water Services on-site treatment system.
- DSCN2025 – Facing east, photo showing silt fencing along the northern perimeter within the Phase 3 area.
- DSCN2026 – Facing west from the northern perimeter within the Phase 3 area, photo of the temporary stockpiles. Some of the stockpiles were covered with plastic sheeting and some were active at the time of inspections.
- DSCN2027– Facing south from the northeast corner of the site, photo of a temporary holding pond for stormwater collecting along the eastern perimeter.
- DSCN2028 – Facing north from the eastern perimeter, photo of the northern portion of a stormwater conveyance channel that runs along the eastern perimeter. This portion of the channel and associated check dams appeared to be in need of maintenance.
- DSCN2029 – Facing south from the eastern perimeter, photo of the southern portion of a stormwater conveyance channel that runs along the eastern perimeter. This portion of the channel was observed to be was bare and unlined.
- DSCN2030 – Facing east from within the Phase 2 area, photo of the beginning of the stormwater conveyance channel that intercepts and runs along the eastern perimeter.
- DSCN2031– Facing south from within the central area of the site, photo of curbing and walkways recently completed. Stockpiles in this area were generally covered.
- DSCN2032 – Facing north, photo of a stormwater detention pond located along the southern perimeter of the site. The Pond receives stormwater from the southern portion of the Phase 2 area.
- DSCN2033– Facing east, photo of the unstabilized area along the southern perimeter fence line. Channelized erosion was observed in the direction of a stormwater detention pond.
- DSCN2034 – Facing east, photo of the stabilized areas near the southwest corner of the development.
- DSCN2035 – Facing north, photo of the Phase 1 area just east of the main entrance.
- DSCN2045– Facing east, photo of the unstabilized area along the southern fencing line. Photo taken on 02/11/21.
- DSCN2046– Facing east, photo of the unstabilized area along the southern perimeter fence line. Channelized erosion was observed in the direction of a stormwater detention pond. Photo taken on 02/11/21.
- DSCN2047 – Facing east from within the Phase 2 area, photo of the beginning of the stormwater conveyance channel that runs along the eastern perimeter. Photo taken on 02/11/21.
- DSCN2048 – Facing south from the eastern perimeter, photo of the southern portion of a stormwater conveyance channel that runs along the eastern perimeter. This portion of the channel was observed to be was bare and unlined.
- DSCN2049 – Facing north from the eastern perimeter, photo of the northern portion of a stormwater conveyance channel that runs along the eastern perimeter. Photo taken on 02/11/21.
- DSCN2050– Facing west from the northwest corner of the site, photo of the temporary stabilized area

within Phase 3 and stormwater discharge pipe from the on-site treatment system. Photo taken 02/11/21.

- DSCN2051 – Facing southeast, photo of tote staged near the on-site treatment system. Photo taken 02/11/21.
- DSCN2052 – Facing north, photo of the on-site treatment system. Photo taken on 02/11/21.
- DSCN2053 – Facing east, photo of the on-site treatment area along the northern edge of Phase 3 area. Photo taken on 02/11/2021.
- DSCN2054 – Photo of the SWPPP cover page.
- DSCN2055 – Photo of Page 2 of the SWPPP.
- DSCN2056 – Photo of Page 3 of the SWPPP.
- DSCN2057 – Photo of Page 4 of the SWPPP.
- DSCN2058 – Photo of Page 5 of the SWPPP.
- DSCN2059 – Photo of Page 6 of the SWPPP.
- DSCN2060 – Photo of Page 7 of the SWPPP.
- DSCN2061 – Photo of Page 9 of the SWPPP.
- DSCN2062 – Photo of Page 10 of the SWPPP.
- DSCN2063 – Photo of Page 11 of the SWPPP.
- DSCN2064 – Photo of the Demolition & T.E.S.C Plan within the SWPPP.
- DSCN2065 – Photo of Page 13 of the Monitoring Records contained within the SWPPP.
- DSCN2066 – Photo of the 12/2/2020 Erosion & Sediment Control Inspection Report (Page 1).
- DSCN2067 – Photo of the 12/2/2020 Erosion & Sediment Control Inspection Report (Page 2).
- DSCN2068 – Photo of the 12/9/2020 Erosion & Sediment Control Inspection Report (Page 1).
- DSCN2069 – Photo of the 12/9/2020 Erosion & Sediment Control Inspection Report (Page 2).
- DSCN2070 – Photo of the 01/13/2021 Erosion & Sediment Control Inspection Report (Page 1).
- DSCN2071 – Photo of the 01/13/2021 Erosion & Sediment Control Inspection Report (Page 2).
- DSCN2072 – Photo of the Area/Landscape Map.
- DSCN2073 – Photo of the 09/28/2020 Erosion & Sediment Control Inspection Report (Page 1).
- DSCN2074 – Photo of the 09/28/2020 Erosion & Sediment Control Inspection Report (Page 2).
- DSCN2075 – Facing northeast, photo taken from McWilliams Road of the stabilized area southwest of the detention pond serving the Phase 1 area.

ATTACHMENT C

Email Correspondence

From: [Klemesrud, Jon](#)
To: mike@summitproperty.com
Cc: [Zeman, Maria \(ECY\)](#)
Subject: EPA/Ecology Stormwater Inspection - Preserve at Illahee Plat (NPDES# WAR306947)
Date: Thursday, January 28, 2021 2:52:00 PM

Hi Mike,

Thank you for your coordination efforts this morning for the on-site construction stormwater inspection at the Preserve at Illahee Plat. Just to summarize again, I am an inspector with USEPA out of our Region 10 Seattle office. EPA Region 10 has been working with WA Dept of Ecology in conducting inspections under their Construction Stormwater General Permit. The inspection this morning was a routine inspection and not based off any complaints, I was joined by Maria Zeman (Ecology) who you may be familiar with from previous site visits.

As Jeff and Marilea were not on-site today you authorized Chris Sita (Sita Enterprises) to give myself and Maria a site tour, Chris was very helpful and we appreciated him taking the time to do so. As I mentioned to you on the phone, we toured the perimeter of the site, viewed the discharge location, treatment setup, collection ponds, as well as various BMPs that were in place at the time of inspection.

During our walkthrough I identified a few BMPs or areas that might require some attention. As discussed with Chris on-site (and you on the phone following the inspection), these specific areas include a channel located along the northeast perimeter of the site boundary, it appears as though some check-dams had been washed out towards the northern portion of the channel. The southern portion of the channel also appeared not to be stabilized and could contribute to future sediment filling up the pond below. The other area that stood out during our walk through was the interior part of the site along the southern fence that borders the site along McWilliams Road. It appeared a long section of the area wasn't stabilized and was causing some erosion and material to enter that southernmost pond.

As discussed on the phone, Maria and I would like to return to the site on another day when Marilea or Jeff is available to continue the inspection and review permit related documents/records that weren't accessible today. They can contact me directly to set that up when convenient.

If you have any questions related to the site visit today or any questions about the inspection process please don't hesitate to contact me. Thanks again for your assistance this morning allowing us to conduct a site walkthrough.

Much appreciated,

Jon Klemesrud
Field, Data, & Drinking Water Enforcement Section
Enforcement & Compliance Assurance Division (M/S 20-C04)
U.S. Environmental Protection Agency, Region 10
(206) 553-5068

ATTACHMENT D

**Area/Landscape Map
(#Photo DSCN2072)**

NO. 17-00007
 DATE: 08/08/21
 REV: 01/08/21

Landscape

- = Amenity
- = Juniper plugs in checkerboard
- = Proposed playfield Ecotone seed mix
- = Proposed native meadow seed mix
- = Proposed mature tolerant street trees Maple var 25' O.C.
- = Proposed native screening areas, at Ex. Shore Pine, Go Serviceberry, Mock Flowering Currant, Small shrubs: 1 G. Medium shrubs: 12 Large shrubs: 12'
- = Proposed native slopes: Ex. Oregon Flowering Currant, Beach Strawberry
- = Existing wetlands to be graded. Invasive hand. Existing native will be enhanced as per wetland consult

Sight obscuring buffer per KCC 17.500.027.1, this required due to same zoning requirement adjacent property to the East.
 *See L-3 for zone specific plant lists

6" Cedar solid privacy fencing along East property line lots 97-108

Sample Planting for Dry Sunny Beds
 (see L-3 for full list): Limit to 3-5 species per bed, ground cover on outside edges only, like plants, tallest shrubs at back of bed, follow spacing information below
 Ground cover: 4" planted 18" O.C. or 10' planted 2' O.C.
 Fragaria chiloensis, Beach Strawberry
 Arctostaphylos uva ursi, Kinnikinnick

Small shrubs: 1 G. at least 12" H. planted 3' O.C.
 Mahonia repens

Medium shrubs: 1 G. at least 12" H. planted 3' O.C.
 Snowberry
 Rosa nutkana

Large shrubs: 1 G. at least 18" H. planted 5' O.C.
 Red Flowering Currant
 Oregon Grape
 Philadelphus
 Ocean spray

Sample Planting for Bio Retention Side Slopes
 (see L-3 for full list): Limit to 3-5 species per bed, ground cover on outside edges only, group like plants, tallest shrubs at back of bed, follow spacing information below
 Ground cover: 4" planted 18" O.C. or 10' planted 2' O.C.
 Fragaria chiloensis, Beach Strawberry
 Arctostaphylos uva ursi, Kinnikinnick

Small shrubs: 1 G. at least 12" H. planted 3' O.C.
 Mahonia repens

Medium shrubs: 1 G. at least 12" H. planted 3' O.C.
 Snowberry
 Rosa nutkana

Large shrubs: 1 G. at least 18" H. planted 5' O.C.
 Red Flowering Currant
 Oregon Grape
 Red Cedar Dogwood



Planting detail: typical planting style in a sample 25x75' dry sunny bed*
 Scale: 1" = 50 ft
 * Any plant from approved list on L-3 can be used in each bed. Use 1-2 plants from each list of large, medium, and low plants with 1 ground cover at the front edge of each bed. Always group like plants and orient planting with largest plants and trees at the back of the bed, medium plants at the center, low plants at the front, and ground cover along the front edge, TYP.

02.11.2021 11:14

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