Construction General Permit Inspection

FACILITY INFORMATION
Inspector's Name: Regional Board Staff: Joshua Luders, Water Resource Control Engineer
Facility Name: Grove Village
Facility WDID: 1 49C387538
Facility Address: 2872 Stony Point Road, Santa Rosa, Sonoma County
Construction General Permit Type and Level: Sediment Risk: Medium; Receiving Water Risk: High; Risk Level: 2
Legally Responsible Party: City Ventures Homebuilding Inc; Director of Construction Quality Assurance: Gregory Clisby (Referred to as City Ventures or Discharger in this document)
Name of QSD: Ryan Bittner #20936 is the QSD listed in SMARTS
Name of QSP: Paul Keiran from Kaz and Associates verbally declared himself as the Site QSP on October 25, 2021
INSPECTION INFORMATION
Inspection Date: October 23, 2021 Drive-By**,** October 24, 2021 Drive-By, October 25, 2021 Morning Drive-By, October 25, 2021 After Morning Onsite, and October 29, 2021 Onsite
Purpose of Inspection: Follow up to October 23, 2021 pre-rain drive by inspection where site was observed to have minimal to no BMPs
Parties Present During Inspection: Regional Water Board: Joshua Luders, Water Quality Control Engineer, on October 23, 24, 25, and 29, 2021 City of Santa Rosa: Javier Fernandez, Civil Engineering Tech III, on October 29, 2021 City of Santa Rosa: Nick Sudano, Senior Environmental Specialist, on October 29, 2021 City Ventures Homebuilding Inc: Andrew Thomas, Offsite Construction Manager on October 25, 2021 City Ventures Homebuilding Inc: Brian Park, Construction Manager, on October 29, 2021 Kaz and Associates QSP: Paul Keiran, Qualified SWPPP Practitioner, on October 25 and 29, 2021
Is the SWPPP Onsite: No. Andrew Thomas and Brian Park with City Ventures, said on October 25 and on October 29, respectively, that the SWPPP was stored at another location. The Site SWPPP uploaded to SMARTS did not reflect the conditions of the Site.

Introduction:

On February 26, 2021, Gregory Clisby of City Ventures Homebuilding Inc. certified himself as the Legally Responsible Person (LRP) for the Grove Village Site (referred to as the Project or Site in this document), enrolling the Project/Site for coverage under the Construction General Permit (CGP). The Project is registered in SMARTS as being a Risk Level 2 site, with a total disturbed area of 18.57 acres, located in the City of Santa Rosa (City), as shown in Map 1. The Site drains to the City of Santa Rosa's storm drain system which outfalls to Colgan Creek, a tributary to the Laguna De Santa Rosa, in the Russian River watershed.

As described in the inspection observations summarized below, City Ventures did not implement the required minimum sediment and erosion control BMPs needed to prepare the Site for a forecasted rain event. As a result, precipitation and stormwater runoff mobilized a large amount of sediment from disturbed, unprotected soil on the Site, and a significant volume of sediment-laden stormwater runoff discharged from the Site into the City's storm drain system. The federal Clean Water Act section 303(d) list identifies the entire Russian River watershed as impaired due to sediment and temperature.

Map 1: Shaded blue area depicts the Project area. The black arrows indicate key features that are specific to the inspection observations below. (Image obtained from City of Santa Rosa staff Nick Sudano on October 28, 2021. Regional Water Board staff edited the image to include descriptive information regarding the observations below.)

Summary of Inspection Observations:

This section summarizes the following five Site visits/inspections: 1) October 23, 2021 Drive-By Inspection, 2) October 24, 2021 Drive-By Inspection, 3) October 25, 2021 Morning Drive-By Inspection, 4) October 25, 2021 After Morning Onsite Inspection, and 5) October 29, 2021 Onsite Inspection. All Photos referenced in the following inspection findings are provided in the Photo Observations section at the end of this document.

October 23, 2021 Drive-By Inspection

I drove by the Site on October 23, 2021 and observed large areas of exposed soil without sediment and erosion control Best Management Practices (BMPs). There was an imminent forecasted precipitation event, and the Site did not appear to be adequately stabilized in anticipation of this event. As observed from the fence line, and depicted in Photo 1 - Photo 4, the entire site had been mass graded and future roadways cut in. Comparing my observations to the Project boundaries depicted in Map 1, it appeared that the full 18.57 acres of site disturbance had occurred, and all disturbed soil was exposed and unprotected (Photo 1, Photo 2, and Photo 3). I observed that framing for a few buildings had commenced in a relatively small area near the middle of the Site (Photo 1).

The only BMPs I observed were two parallel lines of straw wattles along the project frontage, rocking at the gate at the South Entrance on Stony Point Road, and a weighted wattle with debris obstructing most of the municipal storm drain inlet near the North Entrance (Map 1, Photo 1, Photo 2, Photo 3, and Photo 4). The overall lack of BMPs throughout the approximately 18 acre disturbed area was particularly concerning, as a large atmospheric river rain event was forecasted to produce more than 5 inches of rain the following day. This rain event had been discussed on all the major news outlets for over a week, Sonoma County was under an extreme weather watch, high wind warning, and flash flood warning. This forecasted event was the first sizable rain event of the season after more than two years of extreme drought.

In light of these observations and the weather forecast, I posted an inspection report to the Discharger's SMARTS account the same day, notifying the Discharger about the forecasted rain event and the lack of BMPs. In addition, I noted that I had not been able locate a site-specific Stormwater Pollution Prevention Plan (SWPPP) in the Discharger's SMARTS account that reflected the conditions of the Site that I had observed on this day.[1] Soon after the inspection, I found and reviewed the SWPPP uploaded to SMARTS (Attachment ID 2438542, a PDF titled as "SWPPP"). This document says, in part, on page 100 of 426, that "[e]rosion and sediment controls shown on this sheet assumes

[1] The Legally Responsible Person for a SMARTS account is notified by email when an inspection report is attached to their account.

street, curb, gutter and storm drains are completed prior to rain." I observed no street, curb, gutter and storm drains that were completed on the site prior to the rain.

Considering the observed site conditions and the absence of a site-specific SWPPP, I was concerned that no stormwater plan had been developed and that the Discharger had made no plans to protect the Site under construction in advance of either the immediate or future coming rains.

October 24, 2021 Drive-By Inspection

At 12:42 p.m. on October 24, 2021, I received an email from Pat Murphy, a QSP from Kaz and Associates. Mr. Murphy's email reported rainy weather conditions at three separate City Ventures construction projects within the City of Santa Rosa.

With respect to the Grove Village Project, Mr. Murphy's email reported that "the project has 3 large sediment traps to contain all run off." The SWPPP for the Project does not mention the sediment traps; Mr. Murphy's email provided the first mention of these features at the Site.

Mr. Murphy's email stated, further, that "the site is inspected daily during this abnormal rain storm" and that "the results of any run off sample as well as SWPPP amendment will be uploaded on SMART[S] and a copy [sent] to [Joshua Luders]." Mr. Murphy's email indicated that the SWPPP was under revision and that the Kaz and Associates team was working to "show what BMPs are currently implemented at the site as an Amendment to the existing SWPPP."

At approximately 4:00 p.m., I visited the Site. See Photo 5 - Photo 11. By this time approximately 6.1 inches of rain had fallen over the past 24 hours, according to NOAA rainfall records. Another 1.2 inches was forecasted for the next 24-hour period.

On my way to the Site, I did not observe any flooding on Stony Point Road, however, when I arrived at the Site, I observed ponded turbid runoff leaving the Site and entering the municipal storm drain system near the Site's north entrance on Stony Point Road (Map 1, Photo 5, and Photo 6). The east lane of Stony Point Road was partly flooded. It appeared that the obstructed municipal storm drain inlet I saw the day before was partly or mostly responsible for the flooding along the Site's frontage (Photo 9).

I observed that the highly turbid runoff was originating from the Site. (See Photo 5, Photo 6, Photo 7, and Photo 8). The runoff from the adjacent properties to the north and south was significantly clearer, which made it easy to distinguish the turbidity mixing zones at the roadside boundaries of the Site (Photo 5, Photo 6, Photo 7, and Photo 8)

At the Site, I observed highly turbid runoff ponded within the rough-graded roadway system on the site, and I noted that the runoff was not contained within the Site, but was discharging onto Stony Point Road. It appeared that no new sediment traps had been constructed on the Site; the only observable "sediment trap" was the roughly graded

road system, which appeared unchanged from the previous day's conditions. Runoff volume appeared to have exceeded the storage capacity of the rough graded roadway, and turbid runoff was discharging offsite at and near the north and south entrances along Stony Point Road (Map 1, Photo 9, Photo 10, and Photo 11). I did not observe any evidence of the 3 sediment traps mentioned in Mr. Murphy's email.

During this Site visit, I also observed that stormwater accumulating on the building pad near the south entrance did not drain to any observable sediment trap; rather it drained off of the Site (Photo 10). I observed erosion rills leading from the bare, disturbed soil building pad toward a single row of incorrectly-installed wattles, and I observed a large volume of turbid water exiting the Site.

October 25, 2021 Morning Drive-By Inspection

I returned to the Site at approximately 9:30 a.m. the next morning, October 25, 2021, to view the Site following the previous day's rain event. See Photo 12 - Photo 22.

As soon as I arrived, I observed that the municipal storm drain inlet on Stony Point Road was still obstructed with a weighted wattle (Photo 12 and Map). I continued my inspection by walking south on Stony Point Road (Photo 13 - Photo 22). Since the ponded water had subsided substantially, I was able to observe portions of the Site that had been under water the previous day. I saw evidence of erosion and an absence of BMPs throughout the site. The few wattles that remained along the project frontage were mostly deteriorated (Photo 14 and Photo 22).

On the project frontage, I observed small volumes of water entering what appeared to be holes leading to an unknown cavity(s) near Stony Point Road (Photo 17 and Photo 18). These holes appeared to occur near corresponding square asphalt patches along the Project boundary on Stony Point Road.

As noted above, when I viewed the Site on the previous day, the rough-graded road system had been completely filled with turbid water. Now this area was nearly empty (Photo 15 and Photo 21). Meanwhile, near the southern boundary of the Site, I observed significant standing water and ponding (Photo 20); I have identified this area on Map 1 as the South Ponding Area (Map 1). With less than one day since the rain had filled both the South Ponding Area and the rough-graded road system with ponded stormwater, the observed difference in ponding from one location to another, led me to believe that the rough graded road system had an outlet.

Nobody was present on the Site at this time, so I drove to another City Ventures Homebuilding Inc. development site in Santa Rosa, the Round Barn Village, in the hopes of finding a City Ventures representative who would take me back to the Grove Village Site and provide access for an onsite inspection. At the Round Barn Village site, I encountered City Ventures representative Andrew Thomas, who agreed to drive over to the Grove Village Site, and meet with me and the Discharger's QSP, Paul Keiran from Kaz and Associates. Paul Keiran joined us at Round Barn just prior to us leaving for Grove Village.

Before I left the Round Barn Village site, in discussion about going to Grove Village they suggested we stop by their Stony Village North CGP site on the way. I declined, saying that I would like to inspect the Grove Village site first. They agreed to meet me there, and I drove back over to the Site.

October 25, 2021 After Morning Onsite Inspection

As planned, Andrew Thomas with City Ventures and Paul Keiran from Kaz and Associates met me at the Site. Andrew Thomas gave me consent to access the Site and to take photographs (Photo 23- Photo 30). We entered the site at the South Entrance of the Site (Map 1). Andrew Thomas asked where I wanted to go, so I led him toward the South Ponding Area that I had observed from the road during my earlier visit.

The walk to the Southern Ponding Area was very challenging. The ground was saturated, with ankle-deep, and occasionally shin-deep mud. I had to walk carefully and almost lost my boots a few times. While walking to the Southern Ponding Area, I observed no footprints or vehicle tracks to suggest that anyone had been in the area we traveled since the rain yesterday; it would have been impossible for someone to walk where we were without leaving a track in the mud.

On the way toward the Southern Ponding Area, I observed a depression in the rough graded road system, and I observed that the storm drain system and sewer system were already installed (Photo 23, Photo 24, Photo 26, Photo 27, and Photo 28). Andrew Thomas told me that the storm drain and the sewer system were disconnected in a manner that would prevent discharges to the municipal systems. I asked for more clarification, and both Mr. Thomas and Mr. Keiran told me that the storm drain system could not discharge to the municipal system, because there was an obstruction in the pipe, a sort of plug, to prevent discharges. Mr. Thomas and Mr. Keiran said that the system would be cleaned when the project is complete, and only then, with City approval, would the plug be removed.

I asked what the Southern Ponding Area, seen in Photo 24 and Photo 25, was used for. Andrew Thomas said that the basin only captures rainwater that falls on it or comes from the neighboring property to the South. They said that soil in the Southern Ponding Area was taken from this area to build up other areas of the Site. In other words, they were in need of fill and they needed to improvise with onsite material until more fill could be imported.

I asked Mr. Thomas and Mr. Keiran where the water that had been ponded on the road system the day before (Photo 23 and Photo 24) had gone. I pointed out the standing water in the South Ponding Area, in contrast to the relatively empty road system area. Mr. Thomas and Mr. Keiran suggested that the rainwater in the road system was likely stored in the Site's underground and plugged storm drain system.

I asked for details regarding this underground network of pipes, where the excess stormwater was thought to be stored. Mr. Thomas and Mr. Keiran told me that the underground pipe system is made of 36-inch and 24-inch diameter pipes that span the

footprint of the future storm drain and sewer system. This sounded to me like a large storm drain system, but considering that the water that I had seen ponded over the road area the day before was likely ponded on top of already full underground pipes, the capacity described did not seem likely to be sufficient.

I referred Mr. Thomas and Mr. Keiran to the storm drain inlet depicted in Photo 26 which is located within the rough cut roadway near the South Ponding Area (Map 1). I asked them why there was water ponded around the concrete rim on the outside of the inlet, but not ponded to the rim on the inside. I asked them how water level in the drop inlet, in an area observed inundated with water during yesterday's rainy weather inspection, could have receded below the inside rim of the inlet, if this were part of a sealed pipe network. Paul Keiran explained to me that the storm drain could be empty at the observed location because the entire underground pipe network is sloped away from this point. Knowing that the property is relatively flat, and knowing that the area had been completely covered with water the day before, I found this explanation unlikely.

Mr. Thomas lifted a storm drain cover so that we could see inside. I observed some water pooling near the bottom of the outlet pipe. See Photo 26, Photo 27, and Photo 28. Compare these photos of the empty storm drain system on October 25, 2021 to the photos of this area taken during my October 24, 2021 Drive-By Inspection. If the downstream storm drain system were plugged, I would have expected all inlets and manholes in this area to be full to the top.

The deep mud in the project area made conditions for walking difficult and dangerous, so rather than continuing into the northern portion of the Site, we walked back the way we had entered. As we walked back, H. Kazemi (Kaz) from Kaz and Associates arrived. Kaz stated that the storm drain system was disconnected from the municipal system and could not discharge. He did not have an explanation as to why the isolated South Ponding Area still contained ponding water and the road system did not.

I asked Kaz why the bulk of the project area did not have any observable erosion and sediment control BMPs. Kaz stated that the area is under active construction and that the project is using sediment traps and that there are perimeter controls. I told Kaz that at a minimum, I did not observe BMPs consistent with the requirements of CGP Attachment D sections E.3 and E.4.; these sections require appropriate erosion and sediment controls, as well as linear sediment controls installed to contour. I also told Kaz that on the previous day, I had observed that stormwater had not been contained within the Site, and that today, most of the ponding water I had observed the previous day in the rough graded road system with the future storm drain system was gone.

I mentioned a condition of the Construction General Permit (CGP) that says in part that the CGP authorizes discharges of storm water associated with construction activity, so long as the dischargers comply with all requirements, provisions, limitations and prohibitions in the permit. I emphasized that this includes compliance with the

Attachment D sections mentioned above, and that I was not observing any attempt to comply with all the sediment and erosion control requirements.

At this point I concluded the inspection and exited the Site.

October 29, 2021 Onsite Inspection

On October 28, 2021, I spoke on the telephone with City staff Nick Sudano regarding my October 24 and 25 inspection observations, and my concern about how the ponded stormwater within the rough graded roadway system had drained from the site. Mr. Sudano sent me a follow up email on October 29, 2021, stating that following our conversation on October 28 that city inspector Javier Fernandez had inspected the site and determined that the storm drain system had not been plugged and that the Site was discharging to the public storm drain system. The discharge was occurring from two 4-inch diameter horizontal pipes installed within the storm drain system. These pipes were supposed to be plugged (Photo 31), per previous statements by both Mr. Thomas and Mr. Keiran. The revelation that there were two uncapped pipes draining the rough graded roadways explained why the ponding in the road system had significantly receded when compared to the South Ponding Area (Map 1).

After receiving Mr. Sudano's email, I immediately drove to the Site to meet Mr. Sudano and Mr. Fernandez, arriving at approximately 1:00 pm. City Ventures representatives were not present, so Mr. Fernandez called City Ventures representatives Andrew Thomas and then Brian Park to ask for permission to enter the site and take photos. Both provided consent via telephone to Mr. Fernandez. Moments later, Mr. Park arrived at the Site and confirmed his consent in person.

Mr. Fernandez showed me the two locations within the storm drain system where the 4-inch bypass pipe could be seen a few feet below the ground surface (Photo 32).There was one uncapped location near the North Entrance and another near the South Entrance (Map 1).

I observed that the 4-inch pipes were now capped (Photo 32). Mr. Fernandez confirmed that he had observed that these two 4-inch pipes had been uncapped when he inspected the site the previous day, October 28th. I observed fresh bright blue droplets of glue on the surrounding soils, likely spilled during application. The glue I observed was very similar to the brand "Christy's Red Hot Blue Glue," a glue commonly used in the construction industry on PVC joints. I also observed that the sediment deposition on the horizontal pipe did not match the clean surface of the recently installed pipes (Photo 32). These findings and Mr. Fernandez documented observations indicated that the system had not been capped prior to the rain event, despite what I had been told by City Ventures staff and their consultants previously.

Both pipes are located at low portions of the drainage system, as they are the pipes connecting the system to the City's municipal storm drain system. If these pipes were uncapped until just before my visit to the Site on October 29, 2021, it appears likely that most or all of the water I had observed ponded on the rough-graded road system area on October 24, 2021 drained into the City's municipal storm drain system.

I asked Brian Park from City Ventures if he knew that the storm drain system was not capped and connected to the MS4. Mr. Park said no. I asked who installed the storm drain system and if they were responsible for capping it. He said that the storm drain system was installed by foreman Steve Silva from Platinum Pipeline Inc. Mr. Park did not clarify if he knew whether Platinum Pipeline Inc. was responsible for capping the system.

[Post-inspection note: I called Platinum Pipeline Inc. immediately after the inspection and confirmed via an office representative that Steve Silva was the foreman for the Site, but he was unavailable to speak to me and the office representative could not confirm if their team capped the storm drain system.]

I asked Mr. Park if he knew if someone had deliberately left the storm drain connection uncapped. Mr. Park said no, and then stated that Mr. Thomas would be the best person to ask.

I left the Site to explore the surrounding area and returned shortly thereafter. When I returned, stormwater consultant Paul Keiran from Kaz and Associates was on the Site.

I asked Mr. Keiran if he knew if the storm drain system was not capped and connected to the municipal system before the October 24, 2021 rain event. Mr. Keiran said no.

I noted that Mr. Keiran had inspected the Site on October 22, 2021 and had stated in his report of that inspection that the storm drain system was disconnected from municipal storm drain system. I asked Mr. Keiran why he had reported that the storm drain was disconnected. Mr. Keiran said that he thought it was disconnected.

I asked Mr. Keiran if he had visually checked to confirm that the storm drain system was disconnected during or before he wrote the October 22, 2021 inspection report. He said that he did not ever visually confirm if it was plugged, but that Mr. Thomas had told him that it was disconnected, and he had taken Mr. Thomas's word for it.

Conclusions:

As reported above, I observed that the Grove Village project did not implement the required minimum sediment and erosion control BMPs required by the Construction General Permit in preparation for a large forecasted rain event. As a result, the site generated a large amount of sediment laden runoff that impacted the public right of way and that passed, untreated, into the City's storm drain system and into Colgan Creek. This discharge was an unauthorized discharge under the Construction General Permit.

Photo Observations:

The Photo observations below depict site conditions and observations that I made during my Inspections of the Site on October 23, 24, 25 (Morning and After Morning), and 29, 2021, as discussed in the Summary of Inspection Findings section above.

Unless specifically noted in the photo caption, I, Joshua Luders, Regional Water Board staff, took the photographs and made the observations below. All the photos that I took have a date and time stamp in the lower right corner that correctly reflects when the photo was taken.

<u>October 23, 2021 Drive-By Inspection</u>

Photo 1: I observed a City Ventures sign with the project address, 2872 Stony Point Road, near the North Entrance of the project (Map 1). Note the quantity of disturbed soil with only two linear wattle features installed parallel to the Stony Point Road. This is

less than one day prior to a major forecasted rain event. Note that vertical construction has commenced in a small location of the Site.

Photo 2: At the North Entrance Stony Point Road is located directly behind the camera. This is a closer view of the project area depicted in Photo 1, the address sign would be to the right. Notice the amount of disturbed area that the Discharger left exposed prior to tomorrow's forecasted rain event. I observed that the site does not yet have curb, gutters, and paved roads even though these conditions are what is shown in the SWPPP saved in the Discharger's SMARTS account.

Photo 3: Looking south from near the South Entrance, the disturbed area continued beyond the metal chain link fence on the left to the edge of Stony Point Road on the right. The two linear sets of roadside wattles are partially destroyed, and the fence line wattle is not trenched in. The South Entrance had a rocked entry way to the gate, which is evident in the foreground.

Photo 4: I observed a City of Santa Rosa Municipal Storm Drain Inlet along Stony Point Road, near the North Entrance (Map 1). Note that the inlet is nearly plugged with a weighted wattle and debris.

October 24, 2021 Drive-By Inspection

Photo 5: This is the same municipal storm drain inlet near the northern property boundary, shown in Photo 4, above, that was partly obstructed on October 23, 2021. The obstruction is partly responsible for ponding water in the public right of way (Map 1). The storm drain inlet location is by the circular-shaped area. Turbid stormwater from the Site is mixing with less turbid stormwater from the adjoining property as it enters the flow restricted inlet. The construction area is located to the left of the photo.

Photo 6: Northern property boundary turbid water mixing zone. Same location as Photo 5, but taken from another angle. In this view, the Project is located towards the right side of the photo.

Photo 7: From Stony Point Road, I observed the adjoining property on the south side of the Project. Note the wattle in the foreground and the long black with orange fence that stretches the southern perimeter of the Project. Runoff from this neighboring property is low in turbidity. Note the clarity of the water: the leaves, grass, and the ground surface can be distinguished through the pooling stormwater.

Photo 8: A turbid water mixing zone on the south side of the Project boundary. I took this photo on Stony Point Road, approximately 10 yards north of the Photo 7 location. The relatively clear low turbidity run-on waters observed at the neighboring property are now mixing with the Site's highly turbid waters.

Photo 9: From Stony Point Road, highly turbid waters can be seen originating from the Site, consistent with my observations at the southern and northern mixing zones along Stony Point Road (Photo 5, Photo 6, Photo 7, and Photo 8).

Photo 10: The Southern Entrance of the Project (Map 1), viewed from Stony Point Road. Turbid waters are ponded throughout the site and flowing toward Stony Point Road. The wattle along the fence line is staked, but not trenched in. Also, the disturbed soils on both sides of the wattle are unprotected. Erosional rills are visible on the slope of the earthen pad.

Photo 11: The North Entrance of the Project (Map 1), viewed from the west side of Stony Point Road. Turbid waters are emerging from the Site. There are no visible erosion controls on the earthen pads. Runoff is not effectively contained on the Site, and highly turbid waters are flowing from the Site beyond the installed wattles.

October 25, 2021 Morning Drive-By Inspection

Photo 12: Looking south at the municipal storm drain inlet on Stony Point Road (Map 1). As originally observed during the October 23, 2021 inspection, the storm drain inlet is still obstructed by a weighted wattle and debris. The obstruction at this storm drain inlet contributed to the flooding observed during yesterday's rain event.

Photo 13: The northwest corner of the Site boundary, viewed from a sidewalk near Stony Point Road. Some ponding waters remain from yesterday's rain.

Photo 14: Roadside wattles along the road near the Site's North Entrance are deteriorating. Note that the disturbed soils to the left of the wattles are relatively unprotected and, at a minimum, partially drain towards the public roadway system.

Photo 15: Looking into the Site from the North Entrance. Stormwater in the area where ponding stormwater was observed during yesterday's rain event has receded to a low spot near the center of the photo. The volume remaining in this photo is significantly less than what was observed yesterday, as seen in Photos 10 and 11.

Photo 16: The rocked Southern Entrance of the Project. Sediment deposition is visible beyond the straw wattles on the asphalt of the public roadway, deposited thickly enough that such that my footprints can be distinguished.

Photo 17: One of the square asphalt patches I observed along the project boundary on Stony Point Road. I observed water trickling into the holes near these patches.

Photo 18: Another location with an asphalt patch, similar to that shown in Photo 17. I could see water trickling into the hole(s) near this patch, which is along the Project boundary on Stony Point Road.

Photo 19: Evidence of erosion on the pad slope, near the South Entrance. Note the rills and sediment deposition immediately behind the wattle, with turbid waters leading beyond the wattle and immediately towards Stony Point Road.

Photo 20: Looking East from Stony Point Road near the Southern Entrance of the Project. The left black arrow indicates the location of the rough graded future road system which is now almost completely drained of ponded water. As noted above, I observed during my inspection the previous day (October 24, 2021) that this road system was completely full of water. The black arrow on the right indicates the South Ponding Area, with significant ponding still present. The area on the right appears to be retaining the water, while the area on the left appears to be drained.

Photo 21: Looking east from Stony Point Road near the South Entrance of the Project. The road system, referenced in Photo 20 above and also observed completely full during yesterday afternoon's (October 24, 2021) rain event inspection is now nearly drained.

Photo 22: Looking north on Stony Point Road along the project boundary. Roadside wattles on Stony Point Road are destroyed.

October 25, 2021 After Morning Onsite Inspection

Photo 23: South side of Project area looking east-northeast. The road depression that was full of ponded turbid water the previous day (October 24, 2021) during the rain event is now almost empty. Not even the minimum erosion or sediment control BMPs are present on the Site. This entire area was under enough water the previous day that the manhole/storm drain inlet locations indicated with the white arrows were not visible.

Photo 24: Looking east within the Project near the south boundary. Note the storm drain and future road system with little to no standing water and compare it to the pooling area to the right. The water pooling on the right is also shown in Photo 25 below. No minimum erosion or sediment control BMPs are present on the Site and the storm drain inlet is unprotected.

Photo 25: Photo of the area I refer to as the South Ponding Area in this report. This feature is not connected to the rough graded roadway system and storm drain system, and there is still significant water impounded in this area. No minimum erosion or sediment control BMPs are present.

Photo 26: Ponded storm water around a storm drain inlet. The ponded water is at the exact level of the top of the concrete inlet but there is no water inside the drain inlet at this time. If the downstream storm drain system were plugged, one would expect that this storm drain inlet would be completely full to the same level as the ponded water observed around the inlet. The single wattle is the only BMP seen in this area and is completely ineffective.

Photo 27: Ponded turbid storm water observed in the bottom of a storm drain manhole.

Photo 28: View inside another drain inlet with a grate cover. Sediment deposition is visible, but there is no pooled water visible here.

Photo 29: A small generator and water pump in the orange perforated bucket was pumping roadside pooling stormwater back into the Project site.

Photo 30: Discharge hose extending from the small generator and pump system shown in Photo 29. The ponding water near Stony Point road was being directed towards an earthen pad within the Project boundary.

October 29, 2021 Onsite Inspection

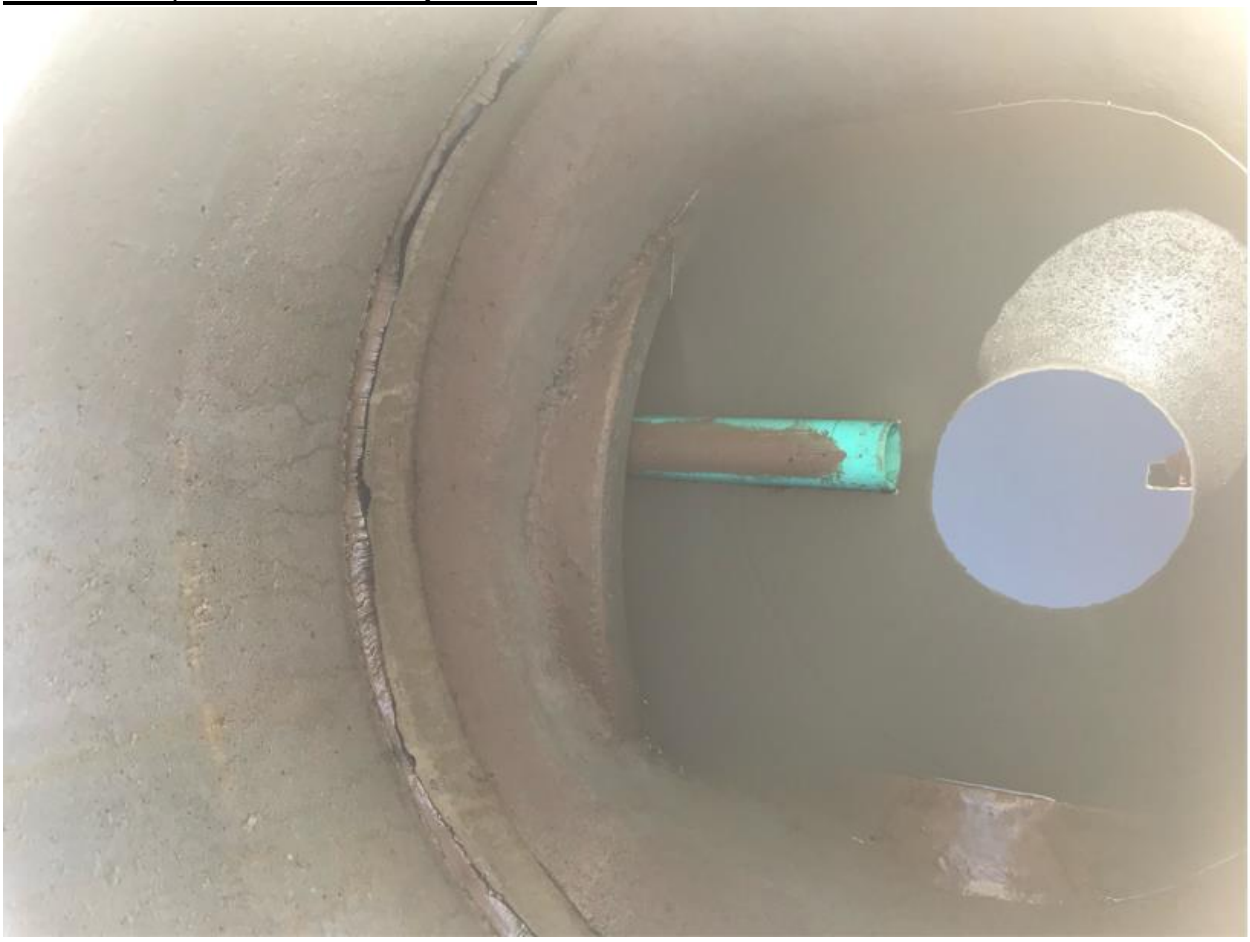

Photo 31: Uncapped 4-inch pipe within a manhole on Site (refenced in Map 1 as either Municipal Storm Drain: North Connection or South Connection). The 4-inch pipe leads to the City of Santa Rosa's public storm drain system. Note the sediment deposition on top of the 4-inch pipe and the pooling water near the bottom rim of the 4-inch pipe. (Photo provided by City staff Nick Sudano on October 29, 2021. Photo taken by City staff Javier Fernandez on October 28, 2021 as part of his City Inspection Report).

Photo 32: New 4-inch riser pipe and cap installed on previously uncapped 4-inch bypass pipe within a manhole on Site (referenced in Map 1 as either Municipal Storm Drain: North Connection or South Con). Note the sediment deposition on the horizontal pipe that does not continue over the white 90 degree joint. This provides evidence that the vertical pipe and cap was not plugged in this manner during the last rain event. The 4-inch pipe leads to the City of Santa Rosa's public storm drain system. Note the sediment deposition on top of the 4-inch pipe and the pooling water near the bottom rim of the 4-inch pipe. (Photo provided by City staff Nick Sudano on November 8, 2021. Photo taken by City staff Javier Fernandez on October 29, 2021 as documentation that the pipe had been capped).