NEW MEXICO
ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.env.nm.gov

SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail – Return Receipt Requested

March 23, 2016

Mr. & Ms. Spencer and D. Carole Snow
166 Chaps Court
Walsenburg, CO 81089

Re: Snow Residence; Lot 42 Las Lomas Subdivision, Santa Fe; Unpermitted Construction Stormwater; SIC 1521, NPDES Compliance Evaluation Inspection; NPDES Tracking No. NMU001908; February 25 & 26, 2016

Dear Mr. & Ms. Snow:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act. Introduction and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

Sincerely,

/s/Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Darlene Whittten-Hill, USEPA (6EN) by e-mail
Robert Italiano, NMED District II by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3	N M U 0 0 1 9 0 8 11 12	1 6 0 2 2 5 17 18	} 19	S 20	2

Remarks: C O N S T R U C T I O N - C O M M O N P L A N - < 1 a c

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 2	71 N 72	N 73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
Small residential lot construction activity at the approximately 0.48 acre Lot 42 of Las Lomas Subdivision located at 106 Daybreak, Santa Fe, New Mexico in Santa Fe County.	~1225 hours / 02/25/2016 ~0830 hours / 02/26/2016	unpermitted 2012 CGP effective February 16, 2012
	Exit Time/Date	Permit Expiration Date
	~1250 hours / 02/25/2016 ~1000 hours / 02/26/2016	unpermitted 2012 CGP expires February 16, 2017

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
-No on-site representative on 02/25/2016
-Mr. Miguel Garcia / Organizer / M.A.G. Construction, LLL, 106 Vista Del Monte, Santa Fe, NM 87507 / 505-670-6360 on 02/26/2016

Other Facility Data
Approximate Entrance:
Latitude 35.682086°
Longitude -105.981384°

SIC 1521 (Single-Family Houses)

Name, Address of Responsible Official/Title/Phone and Fax Number
-Mr. & Ms. Spencer & D. Carole Snow, 166 Chaps Court, Walsenburg, CO 81089 / not provided (Mr. & Ms. Snow's telephone number was requested of the general contractor, but it was not provided).

Contacted: Yes [ ] No [*]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. A National Pollutant Discharge Elimination System (NPDES) Compliance Evaluation Inspection (CEI) was conducted at the above-referenced small residential lot in a common plan of development construction activity from public right of way on 02/25/2016 and on-site on 02/26/2016.
2. A written Stormwater Pollution Prevention Plan (SWPPP) had not been completed (certified/signed) by the owner/operators/general contractor of the construction activity. Neither owner/operator submitted a Notice of Intent (NOI) to obtain permit coverage for stormwater discharges under the USEPA 2012 Construction General Permit (CGP) prior to disturbance estimated to be 11/20/2016 by a representative of the general contractor or by the day of this CEI.
3. Separate EPA Form 3560 will be completed and sent to Mr. & Ms. Spencer & D. Carole Snow (trustee owner/operator) and M.A.G. Construction, LLC (operator/general contractor).
4. See attached further explanations and photo log.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin S. Trujillo */s/Erin S. Trujillo*	**NMED/SWQB/505-827-0418**	**03/23/2016**
Signature of Management QA Reviewer	**Agency/Office/Telephone/Fax**	**Date**
Sarah Holcomb */s/Sarah Holcomb*	**NMED/SWQB/505-827-2798**	**03/23/2016**

Lot 42 Las Lomas Subdivision, Santa Fe, New Mexico
Mr. & Ms. Spencer and Carol Snow, Trustee Owner/Operator, NPDES Tracking No. NMU001908
M.A.G. Construction, LLC, Operator/General Contractor, NPDES Tracking No. NMU001909
Compliance Evaluation Inspection
February 25 & 26, 2016

Further Explanations

Introduction

On February 25, 2016, Erin Trujillo, accompanied by Jennifer Foote, both of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) of a small residential lot construction activity for a single-family house on the approximately 0.48 acre Lot 42 of Las Lomas Subdivision located at 106 Daybreak, Santa Fe, New Mexico in Santa Fe County. Ms. Trujillo completed the inspection with a representative of the operator/general contractor on February 26, 2016. This inspection followed NMED SWQB's receipt of an inquiry on February 2, 2016 of the site's compliance with industrial stormwater regulations.

The purpose of this inspection was to document the site or facility's status regarding the National Pollutant Discharge Elimination System (NPDES) stormwater permit program and regulations found at 40 Code of Federal Regulations (CFR) Section (§) 122.26. Stormwater discharges from construction activities (such as clearing, grading, excavating, and stockpiling) that disturb one or more acres, or smaller sites that are part of a larger common plan of development or sale, are regulated under USEPA's NPDES stormwater program. Prior to stormwater discharge, construction operators must obtain coverage under an NPDES permit (e.g., USEPA Construction General Permit (CGP)) per 40 CFR § 122.26.

Stormwater discharges would flow to on-site drainageways that continue thru subdivision culverts, thence to City of Santa Fe small Municipal Separate Storm Sewer System (sMS4), thence to Santa Fe River in classified segment 20.6.4.136 New Mexico Administrative Code (NMAC) approximately 2,500 feet south-southeast of the site in the Rio Grande Basin. See Figure 1 for site location map.

Ms. Trujillo and Ms. Foote arrived at the site at approximately 1225 hours on February 25, 2016. An owner/operator representative was not on site. There was no sign observed that indicated the owner/operators of the construction activity had permit coverage under the USEPA 2012 CGP. Photos of the site were obtained from public right of way on February 25th. Ms. Trujillo contacted the site's general contractor representative, Mr. Miguel Garcia, Organizer, M.A.G. Construction, LLC; made introductions; and briefly described the purpose of the inspection by phone while on site. Ms. Trujillo made arrangements with Mr. Garcia to continue the inspection the next morning. Ms. Trujillo and Ms. Foote left the site at approximately 1250 hours on February 25th. Ms. Trujillo arrived on site at approximately 0830 hours on February 26, 2016. Upon Mr. Garcia's arrival at approximately 0915 hours on February 26th, Ms. Trujillo made introductions, presented credentials, and explained the purpose of the inspection. Ms. Trujillo and Mr. Garcia toured the site and Ms. Trujillo presented preliminary findings of this CEI and provided copies of USEPA guidance on the requirements of the CGP to Mr. Garcia. Ms. Truillo left the site at approximately 1000 hours on February 26th.

This report is based on available on-line information; USEPA 2012 CGP Notice of Intent (NOI) on-line search database; files maintained by NMED; on-site observation by NMED personnel; and verbal information provided by the owner/operator representative. Parcel information was obtained from County of Santa Fe, NM at http://assessor.santafecounty.nm.gov (Figure 2). Hydrology information was obtained from City of Santa Fe, NM maps available at http://www.santafenm.gov/gis (Figure 3). Corporation information was obtained from the on-line Office of the Secretary of the State, Business Services Division web site at https://portal.sos.state.nm.us/Corps/. Readily available precipitation data was obtained from Weather Underground at http://www.wunderground.com. Las Lomas Subdivision, Homeowner Association Covenants were available online at http://laslomassantafe.com/Covenants_090107.pdf.

Federal Clean Water Act and NPDES Requirements

Section 301 (a) of the Federal Water Pollution Control Act states *"Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful."*

40 CFR § 122.21(a) Duty to apply (1) states *"Any person who discharges or proposes to discharge pollutants …must submit a complete application to the Director in accordance with this section and part 124 of this chapter."*

Large construction activity is defined in 40 CFR Part 122.26(b)(14)(x) as "*Construction activity including clearing, grading and excavation, except operations that result in the disturbance of less than five acres of total land area. Construction activity also includes the disturbance of less than five acres of total land area that is a part of a larger common plan of development or sale if the larger common plan will ultimately disturb five acres or more."*

Beginning on March 10, 2003, 40 CFR § 122.26 (b)(15) states *"Storm water discharge associated with small construction activity means the discharge of storm water from: (i) Construction activities including clearing, grading, and excavating that result in land disturbance of equal to or greater than one acre and less than five acres. Small construction activity also includes the disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one and less than five acres. Small construction activity does not include routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the facility."*

USEPA Construction General Permit

USEPA Construction General Permit (CGP) was re-issued effective February 16, 2012 (Federal Register/Vol. 77, No. 40/Wednesday, February 29, 2012, pg. 12286) replacing the 2008 CGP which expired on February 15, 2012 which replaced the 2003 CGP. Construction operators intending to seek coverage under USEPA CGP must submit a Notice of Intent (NOI) certifying that they have met the permit's eligibility conditions and that they will comply with the permit's effluent limits and other requirements. Permit coverage is required from the "commencement of earth-disturbing activities" until "final stabilization" (see Appendix A Definitions and Part 2.2 of the 2012 CGP). Part 1.4 of the 2012 CGP states, *"…if you have not previously obtained coverage under an NPDES permit, you must submit your NOI immediately*."

A site-specific stormwater pollution prevention plan (SWPPP) is required to be completed prior to submitting a NOI. Among other things, the 2012 CGP requires compliance with effluent limits and other permit requirements, such as the development of a SWPPP, inspection, maintenance, and corrective action. Part 2 of the 2012 CGP (effluent limitations applicable to all discharges from construction sites and/or from construction support activities) includes the following types of requirements: erosion and sediment control requirements (Part 2.1), stabilization requirements (Part 2.2), and pollution prevention requirements (Part 2.3).

Appendix A (Definitions) of the 2012 CGP states:

> *"Earth-Disturbing Activity" or "Land-Disturbing Activity" – actions taken to alter the existing vegetation and/or underlying soil of a site, such as clearing, grading, site preparation (e.g., excavating, cutting, and filling), soil compaction, and movement and stockpiling of top soils.*
>
> *"Final Stabilization" – on areas not covered by permanent structures, either (1) vegetation has been established, or for arid or semi-arid areas, will be established that provides a uniform (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of 70 percent of the natural background vegetative cover, or (2) non-vegetative stabilization methods have been implemented to provide effective cover for exposed portions of the site.*
>
> *"Operator" – for the purpose of this permit and in the context of stormwater discharges associated with construction activity, any party associated with a construction project that meets either of the following two criteria: 1. The party has operational control over construction plans and specifications, including the ability*

to make modifications to those plans and specifications; or 2. The party has day-to-day operational control of those activities at a project that are necessary to ensure compliance with the permit conditions (e.g., they are authorized to direct workers at a site to carry out activities required by the permit). This definition is provided to inform permittees of EPA's interpretation of how the regulatory definitions of "owner or operator" and "facility or activity" are applied to discharges of stormwater associated with construction activity.

"Site" – for construction activities, the land or water area where earth-disturbing activities take place, including construction support activities.

"Temporary Stabilization" – a condition where exposed soils or disturbed areas are provided a temporary vegetative and/or non-vegetative protective cover to prevent erosion and sediment loss. Temporary stabilization may include temporary seeding, geotextiles, mulches, and other techniques to reduce or eliminate erosion until either final stabilization can be achieved or until further construction activities take place to re-disturb this area.

USEPA Guidance

More information on USEPA's 2012 CGP; electronic NOI system; and tools and resources; including SWPPP guidance, is available at https://www.epa.gov/npdes/stormwater-discharges-construction-activities#overview. Frequently Asked Questions is available at https://www.epa.gov/npdes/stormwater-discharges-construction-activities#faq. Common plan is broadly defined in USEPA previous 2003 CGP Fact Sheet at http://water.epa.gov/polwaste/npdes/stormwater/upload/cgp2003_fs.pdf which states:

"Common plan" is broadly defined as any announcement or piece of documentation (including a sign, public notice or hearing, sales pitch, advertisement, drawing, permit application, zoning request, computer design, etc.) or physical demarcation (including boundary signs, lot stakes, surveyor markings, etc.) indicating construction activities may occur on a specific plot.

A copy of USEPA's Small Residential Lot Stormwater Pollution Prevention Plan Template, EPA 830-K-15-001, December 2015 is available from a link at https://www.epa.gov/npdes/stormwater-discharges-construction-activities#resources.

Start of Disturbance and Available Precipitation Information

The on-site sign for the City of Santa Fe Notice of Construction Permit indicated a date of November 4, 2015. According to Mr. Garcia, the start of disturbance (clearing and grubbing) was approximately November 22, 2015 when the lot was being surveyed. Mr. Garcia showed Ms. Trujillo a photo from his cell phone of the surveyor with a date of November 22, 2015. Below is the recorded precipitation and snow events after November 22, 2015 to the day of this CEI at a weather station KSAF (Airport) approximately 7 miles southwest of the site at an elevation of 6345 ft, Latitude 35.62 °North, Longitude 106.09 °West:

Date	Precipitation (Inches)	Events
2015-11-29	0.02	Rain-Thunderstorm
2015-12-12	0.09	Fog-Rain-Snow
2015-12-13	0.02	Fog-Snow
2015-12-22	0.11	Rain-Snow
2015-12-23	0.08	Rain-Snow
2016-1-6	0.11	Fog-Snow
2016-1-7	0.01	Snow
2016-2-1	0.05	Fog-Rain-Snow
2016-2-23	0.13	Fog-Snow

Site Observations

Vegetation and underlying soil was disturbed (cleared) on portions of the site. Foundation construction was in progress. The site sloped to the south to a shallow drainageway.

A stormwater inlet existed northwest of the site near the entrance. According to Mr. Gracia, the buried stormwater pipe had an outlet on site. The outlet was above the shallow drainageway in the southwest portion of the site. There was no on-site temporary erosion control for the stormwater pipe outlet.

Gravel-size rock was at the driveway entrance and appeared to provide sediment and erosion control at the entrance. Some gravel, but no substantial accumulated sediment was tracked out onto the adjacent street which was at a higher elevation than the disturbed area of the construction site.

No other temporary sediment or erosion control measures from disturbed areas, including steep slopes were observed on site.

Mr. Garcia described that some remaining vegetation was to not be disturbed if possible. Remaining trees were not otherwise identified or protected from damage from construction activities. For example, fencing described in the site's construction plan general notes stated "*All trees which are to remain on site shall be protected with a 4' tall brightly colored plastic fence.*"

The site had tarps and plastic, but these were not being used to cover construction materials during this CEI. A portable sanitary toilet existed on site. The toilet was not staked down. The toilet was in a corner of the site and appeared away from current construction traffic on the small lot. Construction materials and sand screening may also be sources of pollutants. No concrete washout control measures were observed. Debris, paper and drink container trash was observed on the ground on site. No other trash control measures were observed.

Findings

The construction activity was on a small residential lot of an approximately 43.19 acre common plan of development Las Lomas Subdivision. Remaining lots for single family house construction in the Las Lomas Subdivision totaled more than one acre.

Mr. & Ms. Snow, trustees/property owners constructing a single-family house in a common plan of development, may meet the definitions of "operator" for construction activity (earth-disturbing or land-disturbing activity) at Lot 42 Las Lomas Subdivision.

M.A.G. Construction, LLC, a limited liability company with a date of incorporation recorded as June 27, 2006 in the State of New Mexico and general contractor constructing a single-family house in a common plan of development, may meet the definition of "Operator" for construction activity (earth-disturbing or land-disturbing activity) at Lot 42 Las Lomas Subdivision. Mr. Garcia indicated that he was unaware that USEPA CGP permit coverage for small construction activities less than one acre in a subdivision may be required.

EPA's 2012 CGP requires compliance with effluent limits (erosion and sediment control, pollution prevention, and site stabilization requirements) including the development of a SWPPP. Neither Mr. & Ms. Snow nor M.A.G. Construction, LLC had prepared or completed a SWPPP in written form and had not submitted a NOI to obtain permit coverage for stormwater discharges under the USEPA 2012 CGP prior to disturbance, which was estimated to be 11/22/2016, or by the day of this CEI.

Stormwater discharges from construction activities on site may impact water quality. Stormwater flowing over the construction site may pick up pollutants (e.g., sediment, debris, and chemicals) and transport them to the City of Santa Fe sMS4 and Santa Fe River.

Figure 1: Site Map/Imagery dated 11/01/2016 (Source: Google earth)

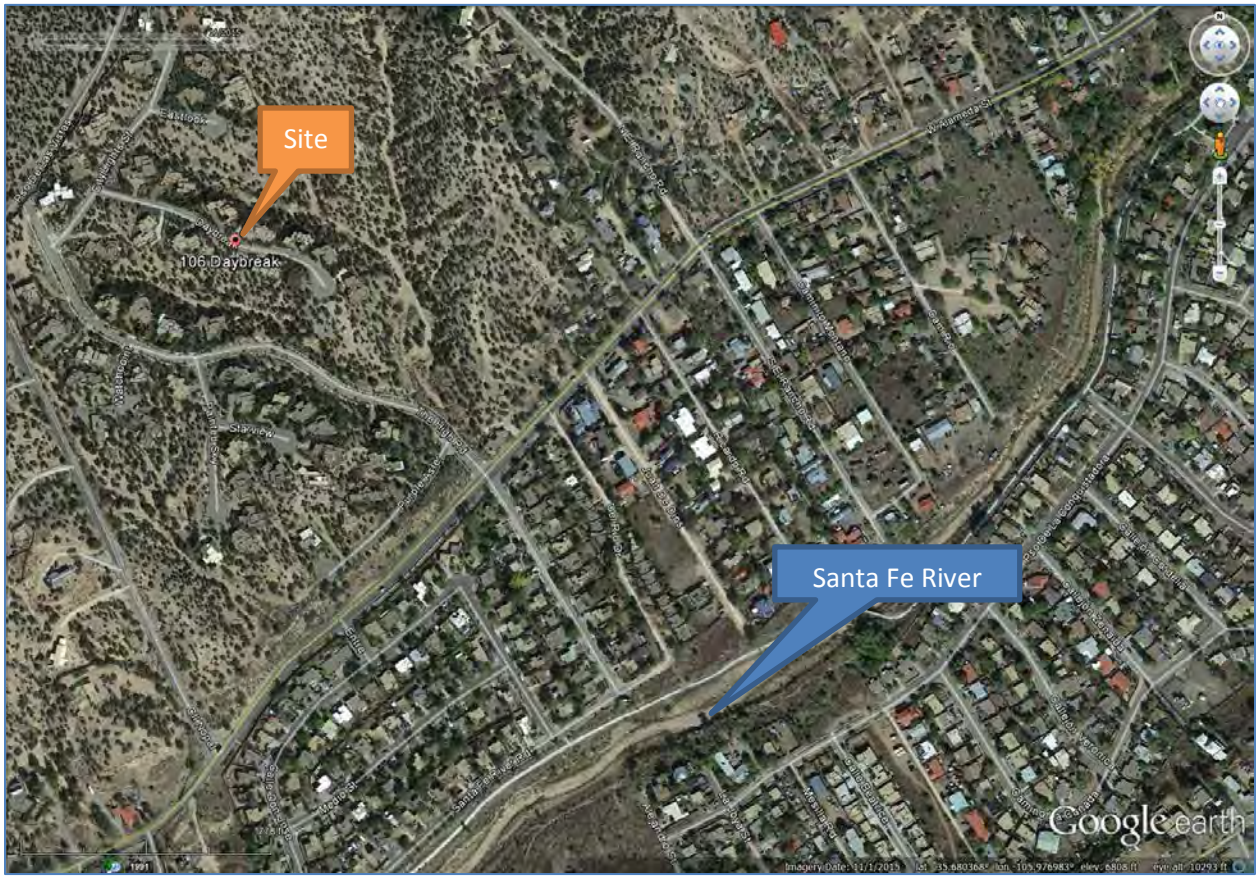


Figure 2: Property Information showning Lot 42 Los Lomas Subdivision
(Source: County of Santa Fe, NM Assessor Parcel Map Search)

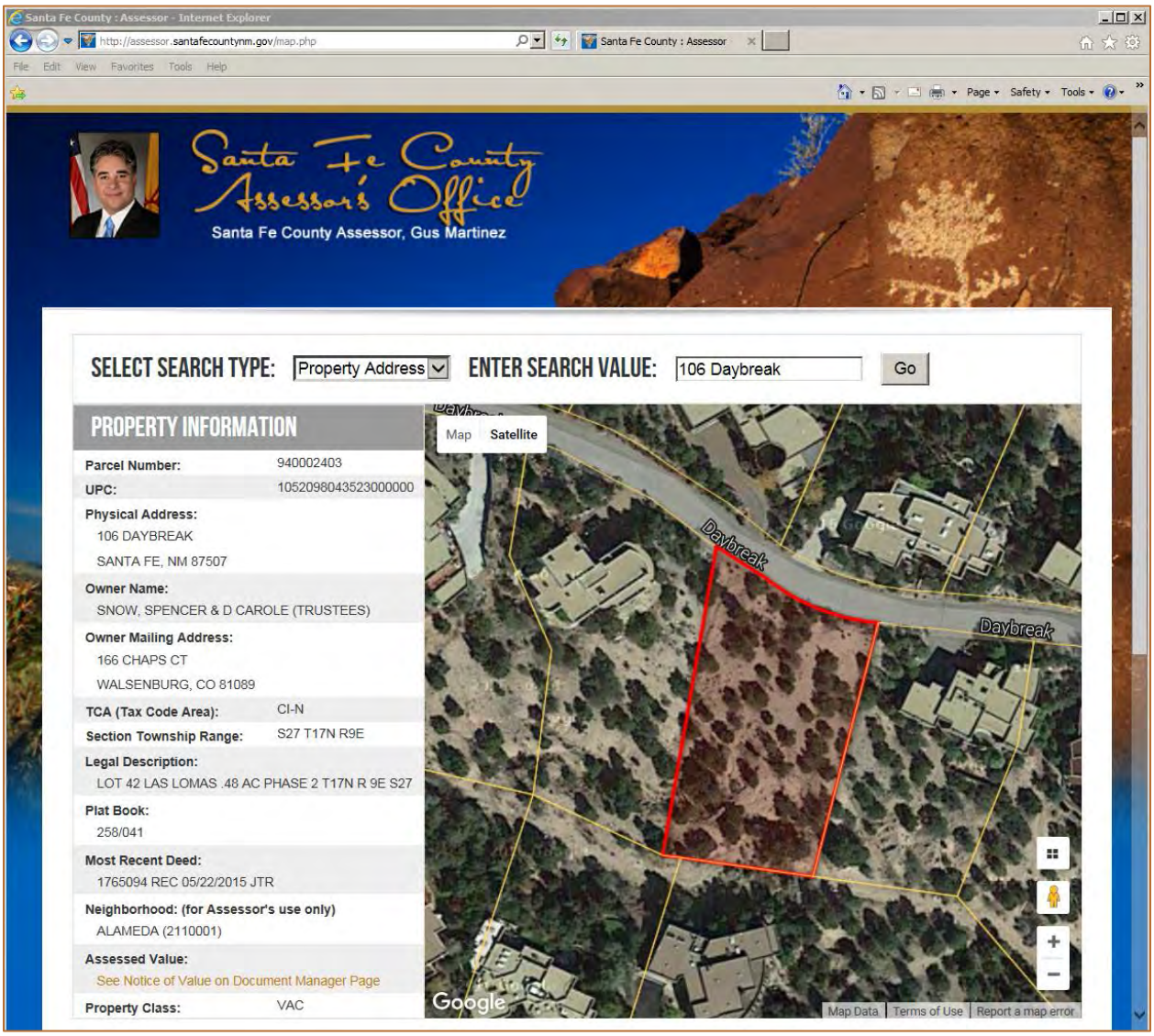
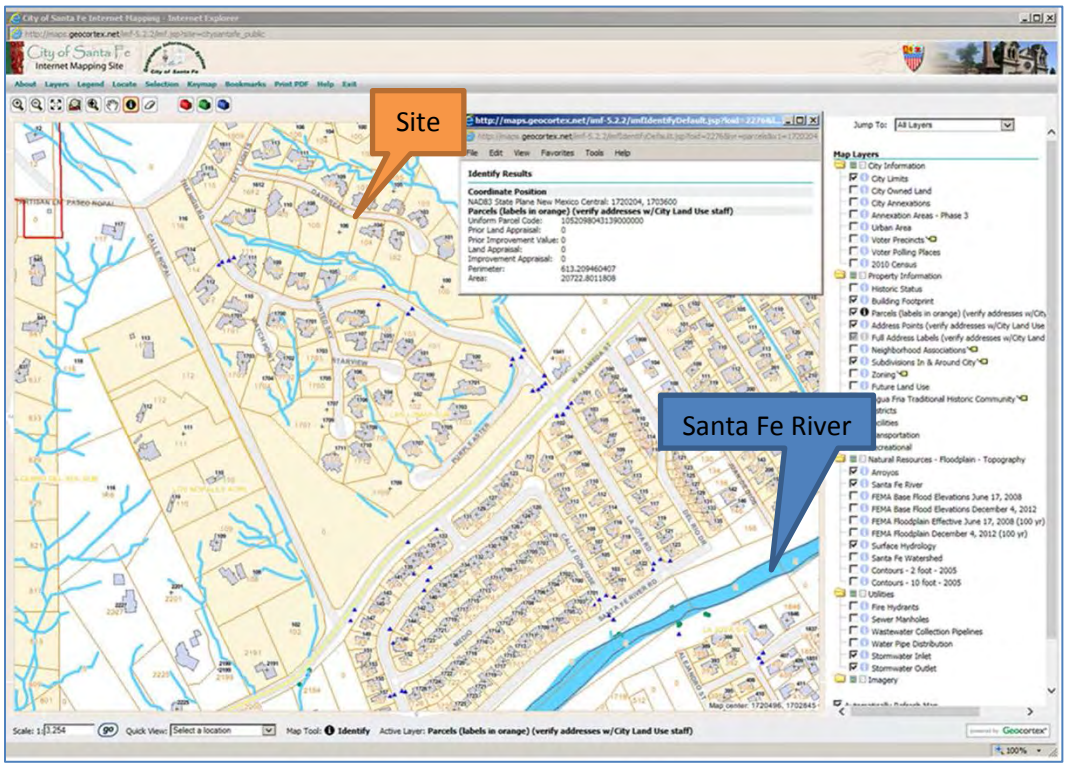


Figure 3: Surface hydrology, arroyos, Santa Fe River, and sMS4 stormwater inlets and outlets (Source: City of Santa Fe, NM Internet Mapping)



NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin S. Trujillo	Date: 02/25/2016	Time: 1227 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: City Notice Construction Permit sign with date of 11-4-15.		

NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin S. Trujillo	Date: 02/25/2016	Time: 1228 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Looking south at construction materials stored on site.		

NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin S. Trujillo	Date: 02/25/2016	Time: 1231 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Arrow points to offsite stormwater drop inlet. On-site outlet of pipe according to on-site representative is shown in Photo #9.		

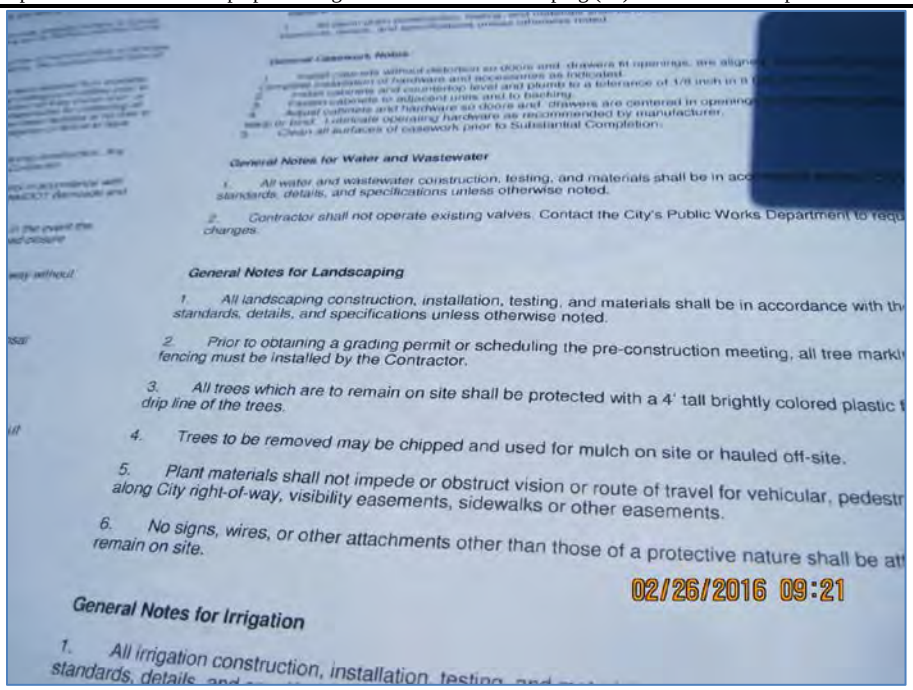
NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Erin S. Trujillo	Date: 02/25/2016	Time: 1231 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Looking south at disturbed area at property boundary. Slope of topography is to the south (background shown in this photo).		

NMED/SWQB Official Photograph Log Photo # 5		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0844 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Looking south at construction materials (plastic and tarps). Arrows point to examples of paper and debris south and behind the portable toilet on site.		

NMED/SWQB Official Photograph Log Photo # 6		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0846 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Arrow points to concrete in the sand screening work area on site.		

NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0846 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Gravel covers entire entrance.		

NMED/SWQB Official Photograph Log Photo # 8		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0921 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Site's construction plans included a landscape plan and general notes for Landscaping (#3) with measures to protect trees.		



General Notes for Water and Wastewater

1. All water and wastewater construction, testing, and materials shall be in acc standards, details, and specifications unless otherwise noted.

2. Contractor shall not operate existing valves. Contact the City's Public Works Department to requ changes.

General Notes for Landscaping

1. All landscaping construction, installation, testing, and materials shall be in accordance with th standards, details, and specifications unless otherwise noted.

2. Prior to obtaining a grading permit or scheduling the pre-construction meeting, all tree markl fencing must be installed by the Contractor.

3. All trees which are to remain on site shall be protected with a 4' tall brightly colored plastic t drip line of the trees.

4. Trees to be removed may be chipped and used for mulch on site or hauled off-site.

5. Plant materials shall not impede or obstruct vision or route of travel for vehicular, pedestr along City right-of-way, visibility easements, sidewalks or other easements.

6. No signs, wires, or other attachments other than those of a protective nature shall be at remain on site.

02/26/2016 09:21

General Notes for Irrigation

1. All irrigation construction, installation, testing, and standards, details, and

NMED/SWQB Official Photograph Log Photo #9		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0945 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: As described by on-site representative, this pipe outlet is from the stormwater inlet shown in Photo #3 .		

NMED/SWQB Official Photograph Log Photo # 10		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0945 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Looking north near western property boundary, arrows point to examples of trash on site.		

NMED/SWQB Official Photograph Log Photo # 11		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0946 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Looking northeast near western property boundary, arrow points to disturbed area and steep slope near foundation.		

NMED/SWQB Official Photograph Log Photo # 12		
Photographer: Erin S. Trujillo	Date: 02/26/2016	Time: 0949 hours
City/County: Santa Fe / Santa Fe County		State: New Mexico
Location: Lot 42 Las Lomas Subdivision, 106 Daybreak, Santa Fe, New Mexico		
Subject: Looking east from central portion of site, vehicle tracks existed near remaining vegetation on site.		