



# COLORADO

Department of Public  
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

March 18, 2016

LeRoy A. Landhuis, Registered Agent  
Lorson South Land Corp.  
212 N. Wahsatch Ave. Suite 301  
Colorado Springs, CO 80903-3476

Certified Mail Number: 7014 2870 0000 7699 5245

**RE: Expedited Settlement Agreement, Number ES-160317-1  
Star Ranch Filing 2 / CDPS Permit Number: COR03M988**

Dear Mr. Landhuis:

Enclosed for your records you will find Lorson South Land Corp.'s copy of the recently executed Expedited Settlement Agreement ("ESA"). Please be advised that the first page of the ESA was changed in order to place the correct ESA Number on the final document. The ESA is now fully enforceable and constitutes a final agency action.

The Water Quality Control Division acknowledges receipt of Lorson South Land Corp.'s payment of the settlement amount and will move forward with payment processing.

If you have any questions, please do not hesitate to contact Andrea Beebout at 303.692.6498 or by electronic mail at [andrea.beebout@state.co.us](mailto:andrea.beebout@state.co.us).

Sincerely,

Andrea Beebout, Enforcement Specialist  
Clean Water Enforcement Unit  
WATER QUALITY CONTROL DIVISION

*Enclosure(s): Expedited Settlement Agreement ES-160317-1*

cc: Enforcement File

ec: Michael Boeglin, EPA Region VIII  
Tom Gonzales, El Paso County Public Health  
Aimee Konowal, Watershed Section, CDPHE  
Michael Beck, Grants and Loans Unit, CDPHE  
Amy Zimmerman, Engineering Section, CDPHE  
Heather Drissel, Field Services Section, CDPHE  
Lillian Gonzalez, Permits Section, CDPHE  
Mike Harris, Clean Water Enforcement Unit, CDPHE  
Tania Watson, Data Management, CDPHE  
Nathan Moore, Clean Water Compliance Unit, CDPHE  
Rik Gay, Clean Water Compliance Unit, CDPHE





# COLORADO

## Department of Public Health & Environment

WATER QUALITY CONTROL DIVISION

### EXPEDITED SETTLEMENT AGREEMENT

Number: ES-160317-1

The Colorado Department of Public Health and Environment (“Department”), through the Water Quality Control Division (“Division”), issues this Expedited Settlement Agreement (“ESA”), pursuant to the Division’s authority under §§25-8-602, 25-8-605 and 25-8-608, C.R.S. of the Colorado Water Quality Control Act (the “Act”) §§25-8-101 to 803, C.R.S., and its implementing regulations, with the express consent of Lorson South Land Corp. (“Lorson”). The Division and Lorson may be referred to collectively as “the Parties.”

1. Lorson is a “person” as defined under the Water Quality Control Act, §25-8-103(13), C.R.S. and its implementing permit regulation, 5 CCR 1002-61, §61.2(73).
2. Lorson is conducting construction activities to build a single family residential development located in or near the Town/City of Colorado Springs, El Paso County, Colorado (the “Project”).
3. Lorson, as described in the attached inspection report, failed to comply with the provisions of its Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (“Permit”), Certification Number COR03M988. The inspection report is attached hereto as Attachment A and is incorporated herein by reference.
4. The parties enter into this ESA in order to resolve the matter of civil penalties associated with the violation(s) alleged herein and in the attached inspection report for a penalty of \$ 10,500.00.
5. By accepting this ESA, Lorson neither admits nor denies the violations or deficiencies specified herein and in the attached inspection report.
6. Lorson certifies that all deficiencies identified in the attached inspection report have been corrected and that the Project is currently in full compliance with the terms and provisions of the Permit. Additionally, Lorson has attached to this ESA: (1) a written description detailing how the deficiencies were corrected; and (2) representative photographs documenting the current conditions and the associated BMPs implemented at the Project.
7. Lorson agrees to the terms and conditions of this ESA. Lorson agrees that this ESA constitutes a notice of alleged violation and an order issued pursuant to §§25-8-602, 25-8-605 and 25-8-608, C.R.S., and is an enforceable requirement of the Act. By signing the ESA, Lorson waives: (1) the right to contest the finding(s) specified herein and in the attached inspection report; and (2) the opportunity for a public hearing pursuant to §25-8-603, C.R.S.
8. This ESA is subject to the Division’s “Public Notification on Administrative Enforcement Actions Policy,” which includes a thirty-day public comment period. The Division and Lorson each

reserve the right to withdraw consent to this ESA if comments received during the thirty-day period result in any proposed modification to the ESA.

9. This ESA constitutes a final agency order or action upon the date when the Executive Director or his designee signs the ESA and effectively imposes the civil penalty.
10. Lorson agrees that within fifteen (15) calendar days of receiving the signed and final ESA from the Division, Lorson shall submit a certified or cashier's check drawn to the order of the "Colorado Department of Public Health and Environment," for the amount specified in paragraph 4 above, to:

Andrea Beebout  
Colorado Department of Public Health and Environment  
Water Quality Control Division  
Mail Code: WQCD-CWE-B2  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

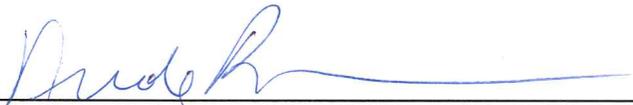
11. Notwithstanding paragraph 5 above, the violations described in this ESA will constitute part of Lorson's compliance history for purposes where such history is relevant. This includes considering the violations described above in assessing a penalty for any subsequent violations against Lorson. Lorson agrees not to challenge the use of the cited violations for any such purpose.
12. This ESA, when final, is binding upon Lorson and its corporate subsidiaries or parents, their officers, directors, employees, successors in interest, and assigns. The undersigned warrant that they are authorized to legally bind their respective principals to this ESA.

**ACCEPTED BY LORSON LAND SOUTH CORP.:**

  
\_\_\_\_\_  
Signature 2/3/16  
Date

Jeff Mark  
\_\_\_\_\_  
Name (printed) VP  
Title

**FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT:**

  
\_\_\_\_\_  
Nicole Rowan, P.E.  
Clean Water Program Manager  
WATER QUALITY CONTROL DIVISION Date: 3/17/16

**Stormwater Inspection Report  
Star Ranch Filing 2**

<b>Permittee:</b> Lorson South Land Corp.	<b>Report Date:</b> July 20, 2015
<b>Legally Responsible Person:</b> Dave Cocolin	<b>Cert#:</b> COR03M988
<b>Facility:</b> Star Ranch Filing 2	<b>Title:</b> VP
<b>Address:</b> Old Star Ranch View & Rocking Tree Grove	<b>Receiving Water:</b> Neal Ranch Creek to Fisher Canyon Creek to Fountain Creek
<b>Persons Present:</b> Jeff Mark/ Lorson South Land Corp; Ron Van Dyke, Trevor Terrill / TNT Landscaping; Steve Kuehster / City of Colorado Springs.	<b>MS4/County:</b> Colorado Springs
<b>Inspector:</b> Rik Gay	
<b>Inspection Began:</b> 6/12/15 1:30 PM	<b>Inspection Completed:</b> 6/12/15 4:00 PM

**Inspection Findings**

The Water Quality Control Division (division) inspector held a closing conference at the conclusion of the inspection, during which the inspector reviewed all alleged inspection findings with the facility representative. The inspector communicated the division's expectation that the facility representative initiate corrective actions, immediately, for all alleged inspection findings, in accordance with the provisions of the CDPS General Permit for Stormwater Discharges Associated with Construction Activity (the permit).

**RECORDS REVIEW**

Note 1: In a communication with the permittee prior to the inspection, the division inspector requested an additional copy of the Stormwater Management Plan (SWMP), supporting documents and inspection records be provided to division personnel at the inspection. The copy of the SWMP, supporting documents and inspection records were provided to the division inspector on June 12, 2015 during the inspection.

Note 2: The permit certification effective date was November 4, 2014. The date that construction started and land-disturbing activities began at the site was September 10, 2014 and the area of disturbance at the time of the inspection was 8 acres as provided by Jeff Mark.

1. In accordance with the Colorado Water Quality Control Act (Act) and the Colorado Discharge Permit System Regulations 5-CCR 1002-61, CDPS discharge permit coverage is required for stormwater discharges from construction activities to surface waters of the State. Specifically, construction activities that disturb one acre or greater, or are part of a larger common plan of development disturbing one acre or greater, require either a discharge permit or an R-Factor waiver. **Failure to obtain either a permit or waiver prior to commencement of construction activities is a violation of the Act subject to potential civil or criminal penalties. Permit application is required at least ten calendar days prior to the commencement of construction activities.**

2. A copy of the SWMP was retained onsite. The division inspector reviewed the SWMP and found it to be inadequate for the following reasons:

- a) The Site Description section did not adequately describe items listed below as required by Part I.C.1 of the permit. Specifically,
- i. The site description only provides a general “native vegetation” description of the pre-construction vegetation.
  - ii. Ground surface disturbance was not identified as a potential pollutant source.
  - iii. Overland discharge to the south to Neal Ranch Creek (reference Colorado Springs General Map) and ultimately to Fountain Creek was not described.
  - iv. The springs observed during the inspection were not identified in the SWMP.

The SWMP shall clearly describe the construction activity, and include:

- The pre-existing vegetation at the site.
- The pre-construction percent density of the vegetated ground cover.
- All potential pollutant sources and their locations.
- The location of anticipated sources of allowable non-stormwater discharge at the site.
- The receiving water(s) for the discharge.

The division expects the permittee to update the Site Description section of the SWMP to include all items required by the permit.

- b) The Site Map section of the SWMP did not identify items listed below as required by Part I.C.2 of the permit. Specifically,
- i. Ground surface disturbance was not indicated.
  - ii. Cut and fill was not indicated on the site map.
  - iii. Springs were observed during the inspection, some of which were being conveyed through the project, were not indicated on the site map.

The SWMP shall include a legible site map(s), showing the entire site and identify:

- All areas of ground surface disturbance
- All areas of cut and fill
- The location(s) of springs in the project area

The division expects the permittee to update the Site Map to include all items required by the permit.

- c) The Stormwater Management Controls section did not identify control measures listed below as required by Part I.C.3 of the permit. Specifically,
- i. Stabilization practices are only generally referenced and does not provide details on how stabilization will be achieved.
  - ii. Section 6.0 of the SWMP directs that hardened concrete washout can be buried in designated non-construction zones. The permit does not allow permanent on site disposal of concrete waste.
  - iii. SWMP provides spill notification procedures but does not address spill response and clean up procedures.

The description of the stormwater management controls in the SWMP shall include at a minimum:

- o All practices implemented at the site to minimize impacts from procedures or significant materials that have the potential to contribute pollutants to stormwater runoff.
- o Spill response procedures for areas where potential spills can occur.
- o All practices implemented at the site to control stormwater pollution from all construction site wastes.

The division expects the permittee to update the Stormwater Management Controls section to include all items as required by the permit.

- d) The Stormwater Management Controls section did not adequately describe the installation and implementation specifications for items observed during the field inspection and listed below as required by Part I.C.3.c of the permit. Specifically, the SWMP references Exhibit 1 & 2, the El Paso County/City of Colorado Springs DCM Volume 2 for the details regarding silt fence and check dams. Those documents were not on site and unavailable during the inspection.

The SWMP shall clearly describe the installation and implementation specifications for all control measures used to control pollutants in stormwater discharges at the site.

The division expects the permittee to update the stormwater management controls to include all items as required by the permit.

3. Inspection records were available for review during the inspection. Upon review, the inspection records were found to be inadequate.

Inspection records from September 19, 2014 through June 10, 2015 were reviewed by the inspector.

- a) Inspections were not performed and/or documented as required by Part I.D.6.b of the permit. Specifically, dates that corrective actions were completed are missing.

Additionally, when the corrective action had been completed or the inspection resulted in no findings, the signed site in compliance certification is missing from the reports.

The permittee shall keep a record of inspections. Inspection reports must identify any incidents of non-compliance with the terms and conditions of this permit. At a minimum, the inspection report must include:

- The inspection date.
- Name(s) and title(s) of personnel making the inspection.
- Location(s) of discharges of sediment or other pollutants from the site.
- Location(s) of BMPs that need to be maintained.
- Location(s) of BMPs that failed to operate as designed or proved inadequate for a particular location.
- Location(s) where additional BMPs are needed and not in place at the time of inspection.
- Deviations from the minimum inspection schedule as provided in Part I.D.6.a.
- Description of corrective action for items iii, iv, v, and vi, above, dates corrective action(s) taken, and measures taken to prevent future violations, including requisite changes to the SWMP, as necessary and;
- After adequate corrective action(s) has been taken, or where a report does not identify any incidents requiring corrective action, the report shall contain a signed statement indicating the site is in compliance with the permit to the best of the signer's knowledge and belief.

The division expects the permittee to conduct and document inspections as required by the permit.

## SITE INSPECTION

Note 3: As required by Part I.D.2 of the permit all control measures mentioned in the following findings must be:

- Selected, installed, implemented and maintained according to good engineering, hydrologic and pollution control practices.
- Consistent with the installation and implementation specifications identified in the SWMP.
- Designed to provide control for all potential pollutant sources associated with the construction activity and to prevent pollution or degradation of state waters.

Note 4: The findings identified below provide specific observations of field deficiencies. It remains the permittee's responsibility to ensure that all permit requirements, terms and conditions are met for the entire construction site.

1. It was noted during the inspection that inadequate control measures were implemented to manage stormwater runoff from sediment from vehicle tracking located on Old Star Ranch and Old Timber Grove roads (refer to photographs 1 & 2).
  - Control Measure Observation: Vehicle tracking control measures were implemented to manage stormwater runoff from the location and pollutant source noted above; however the control measures were inadequate. Specifically,
    - Significant sediment was observed on the streets beyond the tracking pad.
  - Control Measure Finding: An installation and implementation specification was provided for Vehicle Tracking Control in the SWMP but was not in accordance with good engineering, hydrologic and pollution control practice as required by the permit. Specifically,
    - The specification for the tracking pad was limited to the length of the pad. Other dimensions, maintenance of the pad, and frequency of street cleaning were not addressed.
    - Sediment was deposited on the street surfaces indicating that the control measures, as they were being implemented, were inadequate.
  - Stormwater runoff from this area is discharged as follows: Runoff from the paved surfaces was collected in inlets which discharged to the Colorado Springs MS4 and ultimately to Fountain Creek. Additional control measures were implemented down gradient of this location (rock sock curb checks). However, these down gradient controls were implemented as part of a treatment train and are dependent on the control measure identified as inadequate in this finding. As a result, the overall system of control measures was inadequate to manage pollutant contribution from the pollutant source referenced above.

- Result: There was a potential discharge of pollutants to the following state water: Fountain Creek
  - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
    - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
    - Practices must be implemented for all areas of potential vehicle tracking, and can include: minimizing site access; street sweeping or scraping; tracking pads; graveled parking areas; requiring that vehicles stay on paved areas on-site; wash racks; contractor education; and/or sediment control measures, etc.
2. It was noted during the inspection that inadequate control measures were implemented to manage stormwater runoff from sediment from disturbed areas located upgradient of the project access (refer to photographs 4 & 6).
- Control Measure Observation: A straw bale control measure was implemented to manage stormwater runoff from the location and pollutant source noted above, however the control measure was inadequate Specifically,
    - Sediment was observed to have bypassed the control measure and had deposited in the curb line.
  - Control Measure Finding: An installation and implementation specification for straw bales observed in the field during the inspection was not provided in the SWMP as required by the permit. Specifically,
    - The straw bales were not secured to the ground as per common industry installation standards.
  - Stormwater runoff from this area is discharged as follows: Runoff from the paved surfaces was collected in inlets which discharged to the Colorado Springs MS4 and ultimately to Fountain Creek. Additional control measures were implemented down gradient of this location (rock sock curb checks). However, these down gradient controls were implemented as part of a treatment train and are dependent on the control measure identified as inadequate in this finding. As a result, the overall system of control measures was inadequate to manage pollutant contribution from the pollutant source referenced above.
  - Result: There was a potential discharge of pollutants to the following state water: Fountain Creek
  - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:

- Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
  - Facilities must select, install, implement, and maintain appropriate control measures, following good engineering, hydrologic and pollution control practices.
3. It was noted during the inspection that inadequate control measures were implemented to manage stormwater runoff from sediment from disturbed areas located upgradient and south of the vehicle tracking pad (refer to photograph 3).
- Control Measure Observation: A straw wattle control measure was implemented to manage stormwater runoff from the location and pollutant source noted above; however the control measure was inadequate. Specifically,
    - Wattle was not secured to the ground.
  - Control Measure Finding: An installation and implementation specification for straw wattle observed in the field during the inspection was not provided in the SWMP as required by the permit. Specifically,
    - The straw wattle was not staked to the ground as according to common industry installation standards.
  - Stormwater runoff from this area is discharged as follows: Runoff from the paved surfaces was collected in inlets which discharged to the Colorado Springs MS4 and ultimately to Fountain Creek. Additional control measures were implemented down gradient of this location (rock sock curb checks). However, these down gradient controls were implemented as part of a treatment train and are dependent on the control measure identified as inadequate in this finding. As a result, the overall system of control measures was inadequate to manage pollutant contribution from the pollutant source referenced above.
  - Result: There was a potential discharge of pollutants to the following state water: Fountain Creek
  - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
    - Maintain all erosion and sediment control practices and other protective practices in good and effective operating condition.
    - Facilities must select, install, implement, and maintain appropriate control measures, following good engineering, hydrologic and pollution control practices.

4. It was noted during the inspection that control measures were not implemented to manage stormwater runoff from sediment from disturbed areas located project wide (with the exception of the entrance) (refer to photographs 11, 12, 14, 18, 21, 24 - 30, 32 - 36, 39, 40, 46 - 49).
  - Control Measure Observation: Control measures were not implemented to control stormwater runoff from the location and pollutant source noted above. Specifically,
    - Control measures were not installed on the down gradient sides of the fill slopes and down gradient of disturbed areas.
  - Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit. Specifically,
    - The permit requires that control measures must be implemented to manage pollutants in stormwater runoff to prevent discharge of those pollutants out of the operators control and to State waters.
  - Stormwater runoff from this area is discharged as follows: Runoff flows originating south and southwest (photo points 5, 8 - 14 & 45 - 49) of Old Star Ranch View Road continued south and were collected in the Neal Ranch tributary which flowed to a detention basin just west of SH 115. Discharge from the detention basin was to the Colorado Springs MS4 and ultimately to Fountain Creek. Runoff flows originating north of Old Star Ranch View Road (photo points 18, 21, 24 - 30, 32 - 36, 39 & 40) was to Old Start Ranch View Road to the site entrance, flows from which were collected by the Colorado Springs MS4 and ultimately to Fountain Creek. Additional inadequate control measures (reference findings 1, 2 & 3) were implemented down gradient of these locations.
  - Result: There was a potential discharge of pollutants to the following state water: Fountain Creek
  - Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
    - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
5. It was noted during the inspection that inadequate control measures were implemented to manage stormwater runoff from run-on flows originating in the west side of the project and conveyed to the east approximately through the center of the project area (refer to photographs 15, 16, 19, 37 & 38).
  - Control Measure Observation: Control measures were not implemented to control run-on from the location and pollutant source noted above. Specifically,

- A series of ditches and culverts were installed to convey run-on through the site but control measures were not installed at inlets and outlets to prevent sediment from coming in contact with flows.
- Run-on flows comingled with surface runoff were of sufficient volume and force to cause significant erosion of the channel.
- Control Measure Finding: Control measures were not implemented to manage stormwater runoff from the above listed pollutant source as required by the permit. Specifically,
  - Conveyance structures were installed to convey the run-on through the project but control measures were not installed to prevent exposure of the run-on flows to unstabilized soils and stormwater runoff.
  - Control measures to remove sediment collected in the run-on flows prior to discharge from the site were not implemented.
- Stormwater runoff from this area is discharged as follows: Discharge was to Old Start Ranch View Road on to the site entrance, flows from which were collected by the Colorado Springs MS4 and ultimately to Fountain Creek. Additional inadequate control measures (reference findings 1, 2 & 3) were implemented down gradient of these locations.
- Result: There was a potential discharge of pollutants to the following state water: Fountain Creek
- Expectations: The division expects the permittee to design and implement control measures as required by the permit and make the following corrections:
  - Control measures must be implemented to manage stormwater runoff from all potential pollutant sources.
  - Control measures implemented at the site must be adequately designed to provide control for all potential pollutant sources associated with construction activity to prevent pollution or degradation of State waters.
  - Update the SWMP when new control measures are installed or control measures are replaced.

Star Ranch Filing 5 Inspection Photograph Location Reference Map



NOTE: The background aerial photography is from 2011



**Photograph 1:** Old Star Ranch Road looking east - Vehicle tracking on road



**Photograph 2:** Looking west from Photograph 1 toward construction entrance - Vehicles Tracking



Photograph 3: Construction entrance - Straw wattle not staked.



Photograph 4: Construction entrance - Straw bales not staked, sediment in flow line



Photograph 6: See photograph #4



Photograph 7: Unstable slope down gradient of an impoundment.



**Photograph 8:** South end of unnamed road. Inadequate control measures at edge of disturbance.



**Photograph 9:** South end of unnamed road. Below location of photograph 8.



**Photograph 10:** South end of unnamed road. Looking south from photograph 9.



**Photograph 11:** South end of unnamed road. No control measures at perimeter of disturbance.



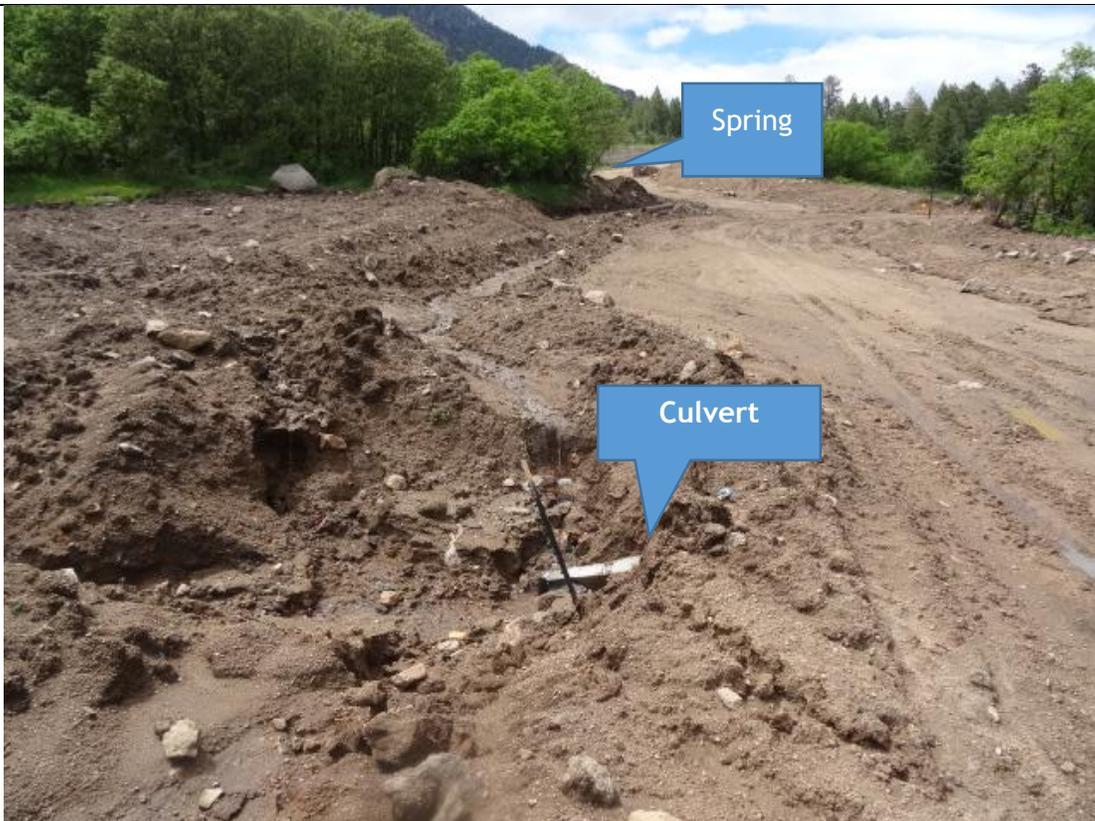
**Photograph 12:** South end of unnamed road. No control measures at perimeter of disturbance.



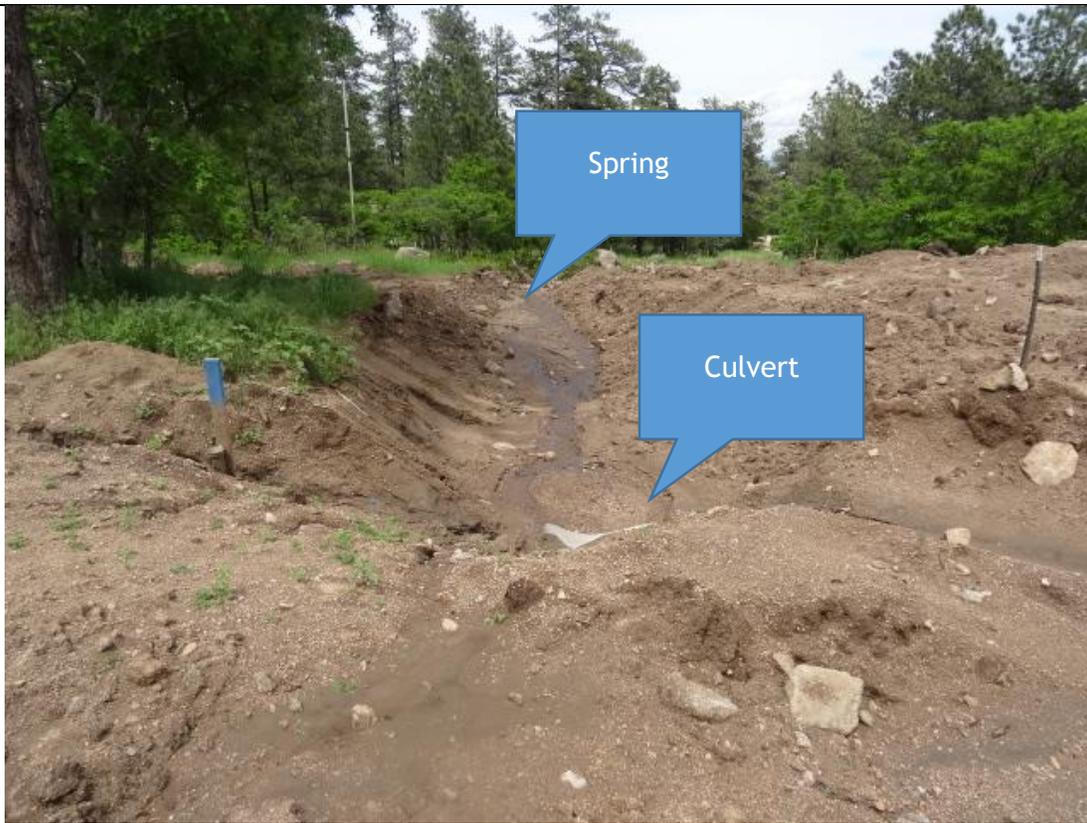
**Photograph 13:** Unnamed road looking north. Disturbed area contributing to photographs 8 - 11.



**Photograph 14:** Unnamed road southwest of Star Ranch Road. No control measures at perimeter of disturbance.



**Photograph 15:** Disturbed contributing area at intersection unnamed road looking northwest on Star Ranch Rd.



**Photograph 16:** Culvert and drainage ditch. No control measures.



**Photograph 17:** Disturbed contributing area above photograph 15, Star Ranch Rd.



**Photograph 18:** No perimeter control measures on downslope side of disturbance.



**Photograph 19:** Spring flowing into the project directed to culvert in photograph 15.



**Photograph 20:** Contributing area at the top of Star Ranch Road looking south.



**Photograph 21:** No perimeter control measures on downslope side of disturbance.



Photograph 22: Upper end of Star Ranch Road looking south.



Photograph 23: High Lonesome View Rd. looking east



**Photograph 24:** High Lonesome View Rd. No perimeter control measures downslope of the disturbance.



**Photograph 25:** High Lonesome View Rd. No perimeter control measures downslope of the disturbance.



**Photograph 26:** High Lonesome View Rd. No perimeter control measures downslope of the disturbance.



**Photograph 27:** High Lonesome View Rd. No perimeter control measures downslope of the disturbance.



**Photograph 28:** High Lonesome View, discharge of sediment from disturbed area in photographs 29 & 30.



**Photograph 29:** High Lonesome View, discharge of sediment from disturbed area in photograph 30.



**Photograph 30:** High Lonesome View, no control measures at top of slope.



**Photograph 31:** East end High Lonesome View, impoundment.



**Photograph 32:** East end High Lonesome View. No control measures at downslope edge of disturbance.



**Photograph 33:** East end High Lonesome View. No control measures at downslope edge of disturbance.



**Photograph 34:** East end High Lonesome View. No control measures at downslope edge of disturbance.



**Photograph 35:** West end High Lonesome View. No control measures at downslope edge of disturbance.



**Photograph 36:** West end High Lonesome View. No control measures at downslope edge of disturbance.



**Photograph 37:** Star Ranch Rd. drainage ditch looking northwest. No control measures.



**Photograph 38:** Star Ranch Rd. drainage ditch looking southeast. No control measures.



**Photograph 39:** Unnamed road between Star Ranch and High Lonesome Rds. No control measures.



**Photograph 40:** Unnamed road between Star Ranch and High Lonesome Rds. Flow path from photograph 39.



**Photograph 41:** Looking east. East end of unnamed road between High Lonesome and Star Ranch Rds.



**Photograph 42:** Looking west. East end of unnamed road between High Lonesome and Star Ranch Rds.



**Photograph 43:** Berm impoundment above photograph 7.



Photograph 44: Looking west up Star Ranch Rd. Contributing area to photograph 45.



Photograph 45: Diversion berm on Star Ranch Rd.



**Photograph 5:** Discharge of sediment down gradient (south) of Old Star Ranch Rd. (Photograph 45)



**Photograph 46:** South side of Star Ranch Rd. No control measures downslope of disturbed area.



**Photograph 47:** South side of Star Ranch Rd. Discharge from photograph 46.



**Photograph 48:** South side of Star Ranch Rd. Discharge from photograph 46.



**Photograph 49:** South side of Star Ranch Rd. Discharge from photograph 46.



**Photograph 50:** Looking east Star Ranch Rd. Tracking pad at construction entrance.



**Photograph 51:** Looking west Star Ranch Rd. left of tracking pad.