



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Bellingham Field Office • 1440 10th Street, Ste 102 • Bellingham, WA 98225
(360) 715-5200 • FAX (360) 715-5225

April 17, 2014

Owen Gosal
Sarbanand Farms LLC
4625 Rock Road
Sumas, WA 98295

Notice of Penalty Docket #	10455
Site Location	4721 & 4775 Rock Road, Sumas, WA 98295
Penalty Amount	\$4,000.00
Due Date	Within 30 days after receiving this Notice of Penalty.

Re: Notice of Penalty

Dear Mr. Gosal:

The Department of Ecology (Ecology) has issued the enclosed Notice of Penalty to Sarbanand Farms for violating provisions of:

- Chapter 90.48.080 Revised Code of Washington (RCW) – Water Pollution Control Law

Please read the enclosed Notice of Penalty describing the violation(s) and options for responding to the penalty.

If you have questions please contact Jessica Kirkpatrick at 360-715-5217 or Jessica.Kirkpatrick@ecy.wa.gov.

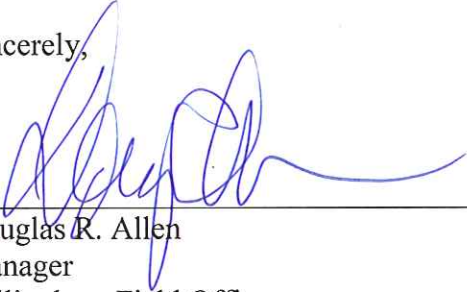


Sarbanand Farms LLC Notice of Penalty Docket # 10455

April 17th, 2014

Page 2

Sincerely,



Douglas R. Allen
Manager
Bellingham Field Office

Enclosures: Notice of Penalty Docket #10455

By certified mail #70123460000028542752

cc: Fiscal-Penalty Desk, Ecology

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF PENALTY)	NOTICE OF PENALTY
ASSESSMENT AGAINST)	INCURRED AND DUE
Sarbanand Farms LLC)	PENALTY DOCKET #10455
)	

To: Owen Gosal
Sarbanand Farms LLC
4625 Rock Road
Sumas, WA 98285

Notice of Penalty Docket #	10455
Site Location	4721 & 4775 Rock Road Sumas WA, 98295
Penalty Amount	\$4,000.00
Due Date	Within 30 days after receiving this Notice of Penalty.

The Department of Ecology (Ecology) has assessed a penalty against Sarbanand Farms LLC in the amount of \$4,000.00 for violating provisions of:

- Chapter 90.48.080 Revised Code of Washington (RCW) – Water Pollution Control Law

Ecology has authority to issue this penalty under RCW 90.48.144 and is basing the penalties on the violations listed in this notice.

DETERMINATION OF VIOLATION(S)

Ecology's determination that a violation has occurred is based on the information listed below.

Executive Summary

Sarbanand Farms LLC arranged for and allowed manure-contaminated material to be applied from one to six inches deep on a field nearly devoid of vegetation from September 23rd through September 27th, 2013. Vegetation was stripped from the fields prior to the manure application, and the manure was applied within 10 feet of two tributaries to Saar Creek. These fields extend to the top of the bank of several drainage ditches (waters of the state) that drain into Saar Creek. Sarbanand Farms did not implement any best management practices (BMPs) before the manure applications to prevent discharges of this polluting matter into state waters. Water Quality Inspector Jessica Kirkpatrick observed manure application in progress in the late afternoon of September 27, 2013, and immediately notified Owen Gosal, manager of Sarbanand Farms

operations on this property, of Sarbanand Farms' responsibility to prevent discharges of polluting matter to state waters. By the time Inspector Kirkpatrick notified Mr. Gosal, it was beginning to rain and already likely too late to implement effective BMPs for an operation of this size and risk. At that point in time, Mr. Gosal directed Pacific Pumping Inc. to 'chisel plow' around the edge of the field closest to Rock Road in an attempt to prevent the runoff of pollution into surface waters. However, this measure proved ineffective.

From September 27th to September 30th, 2.3 inches of rain fell in the area, a rain event that was well forecast by the local news media during the week of September 23rd. Water polluted with bacteria and other pollutants associated with manure discharged from Sarbanand Farms property into surface ditches that flowed into Saar Creek.

On September 30, 2013, Inspector Kirkpatrick collected samples of water discharging from the field bordering Rock Road into the Rock Road roadside ditch as well as samples of surrounding ditches and Saar Creek upstream and downstream of discharge points from the Sarbanand property.) This field is shown in Attachment A, Photos 1, 2, and 3. The sample collected from runoff discharging from the "Field A" (See Attachment C for map and Attachment A: Photos 1-3) into the Rock Road roadside ditch contained 3,800 fecal coliform bacteria units (f.c.u.) per 100 mL of water, a concentration 19 times higher than the state water quality standard for fecal coliform bacteria of 200 f.c.u per 100 mL for the receiving waters (see WAC 173-201A-200(2)(b)). These discharges of polluted matter into waters of the state are violations of RCW 90.48.080, and Ecology has issued this Notice of Penalty in the amount of \$4,000 to Sarbanand Farms LLC for these violations.

Facility Description

Sarbanand Farms owns several parcels of land located at 4625 Rock Road in Sumas, Washington, where they operate a blueberry farm. Part of this property was a dairy farm until the summer of 2013, when Sarbanand Farms began decommissioning three dairy manure waste lagoons and preparing the fields for blueberry planting. The property is bordered by and intersects three drainage ditches that discharge into Saar Creek. Saar Creek is tributary to the Sumas River and documented habitat for several species of salmonids. The drainage ditches intersecting and bordering the farm and Saar Creek are waters of the state. A map of the property and adjoining streams and ditches is included in Attachment C.

Chronology

September 1st through September 7th, 2013

Western Refinery Services Inc., hired by Sarbanand Farms LLC, spread solid manure mixed with dairy cow bedding sand from one or more of the lagoons between 4 and 6 inches deep on a small

portion of Field A in its southwest corner. See Attachment A, Photos 5 and 6 for photos of this area.

September 18th through September 21st, 2013

Sarbanand Farms LLC hired Northwest Liquid Transport to spread material from three dairy manure waste lagoons onto three fields bordering two tributaries to Saar Creek at Sarbanand Farms facility at 4625 Rock Road near Sumas, WA. Two fields had been stripped of vegetation and graded to the top of the bank of drainage ditches that discharge into Saar Creek. These activities were conducted as part of a conversion from a dairy operation to blueberry production.

September 23rd, 2013 through September 27th, 2013

Starting on September 23, 2013 and continuing through September 27, 2013, Sarbanand Farms LLC hired Pacific Pumping, Inc. to spread the remaining dairy waste onto these fields. During the week of September 23rd through September 27th, the National Weather Service predicted that heavy rains would fall in the area between September 28th through September 30th.

September 27th, 2013

Ecology Water Quality Inspectors Chris Luerkens and Jessica Kirkpatrick responded to information received from the Department of Agriculture regarding the risk of manure contaminated discharges from a property located at 4625 Rock Road near Sumas, WA. Inspector Kirkpatrick observed a truck operated by Pacific Pumping applying manure to the field bordering Rock Road. At the time, Inspector Kirkpatrick observed and photo-documented Pacific Pumping applying manure to Field A, which borders the Rock Road roadside ditch (see Attachment C for a map and Attachment A, Photos 1, 3, and 4). The manure was already spread between one and three inches thick on the majority of Field A when Pacific Pumping was observed applying the last loads of manure-contaminated material. The manure-contaminated material was spread to within 10 feet of the roadside ditch of Rock Road.

Inspector Kirkpatrick observed that no best management practices had been implemented to prevent the manure-contaminated material from washing into the water of the state that bordered this field. Inspector Kirkpatrick notified Sarbanand Farms' Farm Manager Owen Gosal that the field would likely discharge pollution to state waters during the rain event that had been predicted for several days. Inspector Kirkpatrick advised Mr. Gosal that in order to avoid discharging polluted water into the Rock Road roadside ditch, and violating RCW 90.48.080, he would have to act quickly to implement effective BMPs.

According to a statement given by Marvin Schouten, owner of Pacific Pumping Inc, Owen Gosal directed Pacific Pumping, Inc. to 'chisel plow' around the edges of Field A late in the afternoon of September 27th. By the late afternoon, rain began falling over the property, and by the end of the day a half-inch of rain had fallen on the area. Weather records show that by September 30th,

two and a half inches of rain had fallen, starting shortly after Inspector Kirkpatrick visited the site.

September 30th, 2013

At the direction of Mr. Gosal, Tim Maclain of Western Refinery Services (WRS) Inc. provided a tour of the fields. Mr. Maclain explained that contents of the south dairy waste lagoon were spread on the fields for approximately 9 days, ending on September 27th.

Inspector Kirkpatrick observed manure-contaminated water discharging from the field bordering Rock Road into the Rock Road roadside ditch, a tributary to Saar Creek. Inspector Kirkpatrick collected a sample of water from the field runoff, and laboratory analysis confirmed that the sample was contained 3,800 f.c.u. per 100 mL of water (see Attachment B for the laboratory report). This concentration is 19 times greater than the state water quality standard for fecal coliform bacteria for Saar Creek, which is 200 f.c.u. per 100 mL. WAC 173-201A-200(2)(b). State water quality standards for fecal coliform bacteria are set at a level determined to be protective of human health (WAC 173-201A-200). The discharge to surface waters of runoff containing levels of fecal coliform bacteria above the state standard is a violation of RCW 90.48.080.

Analysis of a water quality sample collected from Saar Creek just upstream of any potential discharge points from Sarbanand Farms' property show that at that point it carried 160 f.c.u./100mL, not exceeding water quality standards. Inspector Kirkpatrick collected a sample of water from the Rock Road roadside ditch immediately downstream of the point where the runoff from Field A was discharging into this ditch. Analysis results show that this water was contaminated with 2,000 f.c.u. per 100 mL of water, a level 10 times greater than the water quality standard. Analysis of a water quality sample collected from Saar Creek just downstream of the point where the Rock Road roadside ditch discharges into Saar Creek, show that it carried 420 f.c.u./100mL of water, or just more than double the state water quality standard for this stream. Two water quality samples were also collected from ditches draining Fields C and B (See Attachment C for a map). Analysis results show that these ditches had levels of fecal coliform at or near the state water quality standard (170 f.c.u./100 mL of water and 210 f.c.u./100mL of water).

A significant amount of the manure-contaminated material that was observed on the field bordering Rock Road on September 27th (see Attachment A, Photo 1) appeared to have been washed off of the field on this September 30th visit (see Attachment A, Photo 2). At the time of the inspection, the fields were being planted with grass. Inspector Kirkpatrick observed and photo-documented (see Attachment A, photos 7-12) evidence of sediment discharge from these fields into adjacent ditches. Suspended sediment is known to degrade the quality of salmonid spawning habitat. The receiving stream, Saar Creek, has documented presence of several species of salmonids.

Between September 27 and September 30, Sarbanand Farms had implemented a 15-foot wide strip of surface roughening around the edge of the Field A. A 5 to 8-foot wide strip of sawdust was applied in some places (see Attachment A, Photo 11). However, these practices by themselves are not effective to prevent either sediment or bacterial pollution from discharging into state waters.

October 2nd, 2013

Inspector Kirkpatrick notified Mr. Gosal that analysis of the samples collected of water discharging off of the field bordering Rock Road on September 30th confirmed that water was contaminated with fecal coliform bacteria at levels exceeding state water quality standards. Inspector Kirkpatrick advised him to take all actions necessary to prevent further discharges from this operation. Mr. Gosal stated that he would have the fields seeded and apply additional straw and sawdust mulch to the edges of the field.

October 9th, 2013

Inspectors Chris Luerkens and Jessica Kirkpatrick conducted an inspection of this property. Kathy Heriot, an employee of Sarbanand Farms, met us in the office and gave permission for us to access the property. During the inspection, Inspector Kirkpatrick observed evidence of previous erosion from Field C and A and resultant sediment deposition into the drainage ditches bordering Field C and Field A that drain to Saar Creek (see Attachment A, Photo 12). This is likely a violation of 90.48.080 for the discharge of pollutants into state waters.

Additional wood chip and sawdust mulch had been applied to the border of the fields in some places (see Attachment A, Photo 11) since the visit on October 2nd. Grass previously planted in the north field was beginning to sprout, but was not yet sufficiently established to prevent erosion (see Attachment A, Photos 13 and 14).

Inspector Kirkpatrick advised Ms. Heriot that additional measures should be implemented to prevent erosion from the bare fields and fields where vegetation was not sufficiently established to prevent erosion. Inspector Kirkpatrick further advised Ms. Heriot that Sarbanand Farms had a responsibility to implement the BMPs to prevent and control the pollution of the waters of the state.

November 5th, 2013

Inspectors Chris Luerkens and Jessica Kirkpatrick visited the site with Mr. Gosal and Kathy Heriot. Some additional best management practices had been implemented, including additional seeding, and 5 to 15-foot wide strips of straw and sawdust had been installed at the edge of fields. The newly planted grass observed on October 9th was better established.

Mr. Gosal had also installed hydroseeding and three berms across Field A in order to prevent polluted runoff from reaching the Rock Road roadside ditch.

Mr. Gosal explained that he suspected the three dairy manure lagoons on the property were the source of Escheria coli bacteria (a species of fecal coliform bacteria) detected in the shallow groundwater wells on the property. He explained at least one of the lagoons was found to be missing an impermeable liner used to prevent manure liquids from leaking into the groundwater below.

Severity

By spreading an exceptionally large volume of manure-contaminated material onto bare fields immediately before a well-forecast heavy precipitation event without installing any effective best management practices designed to prevent contaminated water from discharging to the state waters that border those fields, Sarbanand Farms caused or allowed polluting matter to discharge to state waters in violation of state law.

The Department of Ecology (Ecology) documented evidence of significant discharges resulting from the spreading activity. Sample results show water polluted with concentrations of fecal coliform bacteria 19 times greater than the water quality standards. The sampling conducted showing Saar Creek was meeting water quality standards for fecal coliform bacteria upstream of Sarbanand Farms' discharges, and exceeding water quality standards by more than a factor of two downstream of Sarbanand Farms' discharges does not rule out other sources of bacterial pollution. However, it is clear that the discharge from Sarbanand Farms' 'Field A' into the Rock Road roadside ditch contributed to the rise in fecal coliform bacteria concentrations and the exceedance of water quality standards in Saar Creek. Photographs of the field, before and after the storm, show that a significant amount of manure-contaminated material was dissipated from the field by that rain and some of that clearly washed into adjacent streams. This discharge also had the potential to affect human health, as fecal coliform bacteria are an indicator of fecal-borne pathogens that can sicken humans who come into contact with them in the water. The environmental degradation caused by sediment- and nutrient-laden runoff from Sarbanand Farms' operation also has potential to negatively affect aquatic life uses of Saar Creek. Saar Creek has four documented runs of Salmonid species:

Listed as Threatend and under Endagered Species Act (ESA)

Fall and Spring Chinook (*Oncorhynchus tshawytscha*)

Not Listed under ESA

Coho (*Oncorhynchus kisutch*)

Chum (*Oncorhynchus keta*)

Sockeye (*Oncorhynchus nerka*)

Relevant Statutes and Rules

Ecology's determination that a violation has occurred is based on the following statutes:

1. RCW 90.48.010 of the Water Pollution Control Act requires the use of all known, available and reasonable methods (AKART) to prevent and control the pollution of the waters of the state.
2. RCW 90.48.020 defines surface waters, including lakes, rivers, ponds, streams, inland waters, salt waters and all other surface waters, as waters of the state.
3. RCW 90.48.020 defines the word "pollution", as used in this chapter, to mean contamination or other alteration of the physical, chemical or biological properties of any waters of the state including change in temperature, taste, color, turbidity or odor of the waters, or discharge of any liquid, gaseous, solid, radioactive or other substance into any waters of the state as will or is likely to create a nuisance or render such waters harmful, detrimental or injurious to the public health, safety or welfare, or to domestic, commercial, industrial, agricultural, recreational or other legitimate beneficial uses, or to livestock, wild animals, birds, fish or other aquatic life.
4. RCW 90.48.080 provides that it shall be unlawful for any person to throw, drain, run, or otherwise discharge into any of the waters of this state, or to cause, permit to suffer to be thrown, run, drained, allowed to seep or otherwise be discharged into such waters any organic or inorganic matter that shall cause or tend to cause pollution of such waters according to the determination of the Department of Ecology.
5. WAC 173-201A-200(2)(b) provides that the standard for fecal coliform bacteria is 200 f.c.u./100 mL where, as here, single samples were taken.
6. WAC 173-201A-510(3)(c) provides that activities which contribute to nonpoint source pollutions shall be conducted utilizing best management practices to prevent the violation of water quality criteria.
7. Under RCW 90.48.144, the Department of Ecology may issue a penalty of up to \$10,000 per day for a violation of RCW 90.48.080.

ELIGIBILITY FOR PAPERWORK VIOLATION WAIVER AND OPPORTUNITY TO CORRECT

ELIGIBILITY FOR PAPERWORK VIOLATION WAIVER AND OPPORTUNITY TO CORRECT

Under RCW 34.05.110, small businesses are eligible for a waiver of a first-time paperwork violation and an opportunity to correct other violations. Ecology has made no determination as to whether you meet the definition of a "small business" under this section. However, for the type of violation at issue here, no correction is possible because the discharge had already occurred. RCW 34.05.110(1)

FAILURE TO COMPLY WITH THIS NOTICE OF PENALTY

Continued failure to correct the violations listed in this Notice of Penalty may result in additional, escalated penalties.

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OPTIONS FOR RESPONDING TO A NOTICE OF PENALTY

Option 1: Pay the penalty within 30 days after receiving the Notice of Penalty.

Make your payment payable to the *Department of Ecology*. Please include the penalty docket number on your payment.

Mail payment to:

Department of Ecology
Cashiering Unit
PO Box 47611
Olympia, WA 98504-7611

Note: Ecology may take legal action to collect the penalty if you have not paid 30 days after receiving the Notice of Penalty, and have not appealed.

Option 2: Appeal to the PCHB and serve Ecology within 30 days after the date of receipt of the Notice of Penalty.

The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days after the date of receipt of this Notice of Penalty:

- File your appeal and a copy of this Notice of Penalty with the Pollution Control Hearings Board (PCHB) during regular business hours.
- Serve a copy of your appeal and this Notice of Penalty on Ecology in paper form, by mail or in person. E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608

Pollution Control Hearings Board
1111 Israel Road SW
STE 301
Tumwater, WA 98501

Pollution Control Hearings Board
PO Box 40903
Olympia, WA 98504-0903

CONTACT INFORMATION

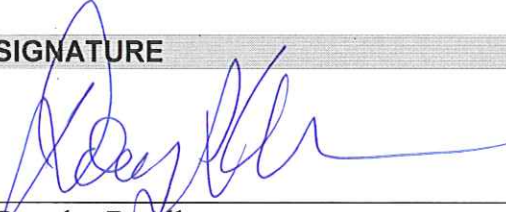
Please direct all questions about this Notice of Penalty to:

Jessica Kirkpatrick
Department of Ecology
Bellingham Field Office
1440 10th St. Suite 102
Bellingham, WA 98225
Phone: 360-715 -5217
Email: Jessica.Kirkpatrick@ecy.wa.gov

MORE INFORMATION

- **Pollution Control Hearings Board:**
www.eho.wa.gov/Boards_PCHB.aspx
- **Chapter 43.21B RCW - Environmental and Land Use Hearings Office – Pollution Control Hearings Board**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice and Procedure**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**
<http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05>
- **Laws:** www.ecy.wa.gov/laws-rules/ecyrcw.html
- **Rules:** www.ecy.wa.gov/laws-rules/ecywac.html

SIGNATURE



Douglas R. Allen
Manager
Bellingham Field Office



Date

Avocet Environmental Testing
 1500 North State Street, Suite 200
 Bellingham, WA 98225-4551
 (360) 734-9033



Client Washington State Department of Ecology
Contact Name Chris Luerkens
Chain of Custody 4200
Date Sampled 09/30/13
Date Received 09/30/13
Date Reported 10/03/13
Test Performed Fecal Coliform Membrane Filter
Matrix Water
Project Name Sarbanand
P.O. # F1A80

Sample Identification	Log Number	Method	Sample Result	Units	Date Analyzed	Analyst
SAAR Creek Rock Road	05730118	sm9222D	420	FC/100 mL	09/30/13	ML
→ Sarbanand 2	05730119	sm9222D	3,800	FC/100 mL	09/30/13	ML
Sarbanand 3	05730120	sm9222D	2,000	FC/100 mL	09/30/13	ML
Sarbanand 4	05730121	sm9222D	170	FC/100 mL	09/30/13	ML
SAAR Creek Upstream	05730122	sm9222D	160	FC/100 mL	09/30/13	ML
Sarbanand 5	05720123	sm9222D	210	FC/100 mL	09/30/13	ML

Sample taken
 from field
 runoff.

QUALITY CONTROL DATA

Test Performed	Growth	Result FC/100mL	Duplicate Difference
Blank	Negative	--	--
E. Coli	Positive	--	--
Enterobacter aerogenes	Negative	--	--
Fecal Coliform Sample Result	Positive	3,800	--
Lab Duplicate	Positive	2,400	45%

FC: Fecal Coliform

Laboratory Supervisor

Attachment A – Sarbanand Farms Photo Log



Photo 1 – September 27th, 2013: Photo from Rock Road of Sarbanand Farms' manure lagoon decommissioning project. Note the heavy application of manure solids to Field A. This manure application was 1 to 2 inches thick in this location. Some dead grass stubble can be seen covered by the application. The grass had been mostly killed prior to application. The weather forecast predicted 100% chance of heavy rains over the next three days on the day this photo was taken.



Photo 2 – September 30th, 2013: This photo shows the same field shown in Photo 1, after three days of heavy rain. Note that some vegetation is now visible on the field, and the absence of the thick layer of manure visible in photo 1. The water flowing off of this field into state waters contained 3,800 fecal coliform colonies per 100 mL of water. Prior to the application the field had been treated with an herbicide and very little living vegetation remains. Also shown is the surface roughening measure that Sarbanand Farms implemented on a 15 foot wide strip after being contacted by Ecology. Stormwater runoff is visible discharging through this strip.



Photo 3 - September 27, 2013: Equipment operated by Pacific Pumping LLC applying manure lagoon contents to a Field A. The manure application to the part of Field A visible from Rock Road was between one to two inches thick.

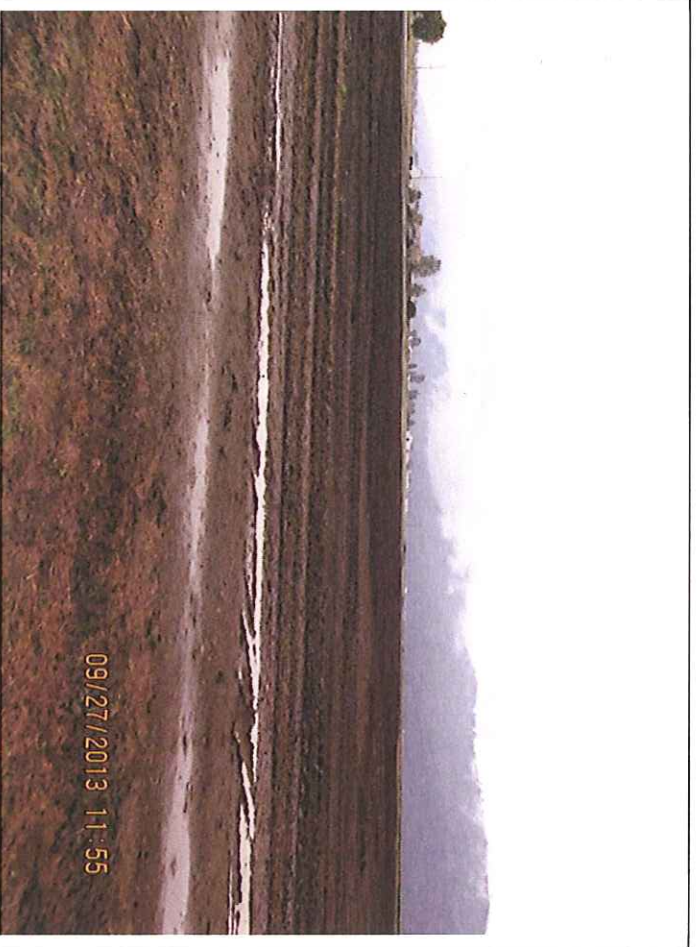


Photo 4 - This photo shows a field devoid of Field B that liquid and solid manure was applied to immediately prior to several days of heavy rain.



Photo 5 – September 30th, 2013: Immediately south of Lagoon 2, solids had been scraped out and spread on the field approximately 4 to 6 inches thick. This material is mostly dried manure that had been scraped out of the lagoon, mixed with a small amount of sand the inside of the lagoon.



Photo 6 – October 9th, 2013. This photo shows a close-up of the material from the lagoons spread four to six inches thick on a smaller part of Field A immediately south of Lagoon 2 in Photo 3. Close inspection of this material indicated that it was mostly manure solids.



Photo 7 – September 30th, 2013 This photo shows Field B. It was leveled and spread with manure. No BMPs had been implemented to prevent sediment or manure from discharging into the drainage ditch in the foreground of the photo.



Photo 8 – September 30, 2013 This photo shows Field C. The contents of the lagoons had been applied to this and other fields prior to September 27th. Evidence of sediment discharge into the stream pictured in the center of the photo was observed along the border of this field.



Photo 9 – September 30th, 2013 This photo shows Field C and its border with a drainage ditch between Field A and Field C that drains to Saar Creek. Field C has been disturbed to the top of the bank and the contents of the manure lagoons spread on the field. There were many places along its border with the ditch where evidence of runoff contaminated with sediment entering the ditch was observed.



Photo 10 – September 30th, 2013 This photo shows a close-up of the area in Photo 5 where visual evidence of contaminated runoff was observed.



Photo 12 – October 9th, 2013 This photo shows Field B. A strip of wood chips has been laid on the edge of this field, between the field and the drainage ditch.



Photo 13 – October 9th, 2013 This photo shows rills in the bank and sediment deposited on the bottom of the ditch along the east edge of Field C. This ditch is a tributary to Saar Creek.



Photo 13 – October 9th, 2013 This photo shows the shoots of new grass starting to grow in Field C. Inspector Kirkpatrick is standing for scale reference.



Photo 14 – October 9th, 2013 This photo shows that although Field C looks green from an oblique angle, the grass is very new and is not established enough to prevent erosion. Inspector Kirkpatrick's boots are in the same position as in Photo 12.

