

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/27/2025		
Media Program:	Water		
Regulatory Program(s)	NPDES Stormwater/CWA 402		
Company Name:	A Mountain Construction LLC		
Facility Name:	Tierra Hermosa Subdivison Phase I & II		
Facility Physical Location:	US Highway 70 at Porter Road and Village Drive		
(city, state, zip code)	Las Cruces, NM 88012		
Mailing address:	1177 Scoggins Avenue		
(city, state, zip code)	Las Cruces, NM 88005		
County/Parish:	Doña Ana County		
Facility Phone Number	(575) 644-9112		
Facility Contact:	Bobby Spedalieri	Owner	
	bsped232@gmail.com		
FRS Number:	110071785988		
Identification/Permit Number:	NMR1006HZ		
Media Identifier Number:	N/A		
NAICS:	238910		
SIC:	1794		
Personnel participating in inspection:			
Kamilah Hutchinson	R6 ECAD-WA	Inspector/Enforcement Officer	(214) 665-7470
Carol Johnson	R6 ECAD-WR	Inspector/Enforcement Officer	(214) 665-8471
Gerard Anaya	City of Las Cruces	Environment Compliance Officer	(575) 541-2008
Shawnee Suazo	New Mexico Environment Department	Complex Facilities Inspector	(505) 469-0987
Beatriz Salazar-Archuleta	New Mexico Environment Department	State Permitting Specialist	(505) 487-0318
Chris Spedalieri	A Mountain Construction LLC	Project Manager	(575) 525-1405
EPA Lead Inspector Signature/Date	KAMILAH HUTCHINSON Digitally signed by KAMILAH HUTCHINSON Date: 2025.10.14 08:48:31 -05'00'		10/14/2025
	Kamilah Hutchinson		Date
Supervisor Signature/Date	ANTHONY LOSTON Digitally signed by ANTHONY LOSTON Date: 2025.10.14 12:49:36 -05'00'		
			Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspectors, Kamilah Hutchinson (Lead), and Carol Johnson, arrived at the Tierra Hermosa Subdivision Phase I & II (THS) construction site on August 27, 2025, at approximately 9:00 AM for an announced Compliance Evaluation Inspection (CEI). The EPA inspectors were accompanied by the City of Las Cruces compliance officer Gerard Anaya, and complex facilities inspector Shawnee Suazo and permitting specialist Beatriz Salazar-Archuleta, both from the New Mexico Environment Department. I presented my credentials to Chris Spedalieri the facility manager at the opening conference and informed him that the inspection was being conducted to determine the site's compliance with its Construction General Permit (CGP), the Clean Water Act (CWA), as well as to evaluate potential impacts to the Waters of the United States near the site. Notably, on August 12, 2025, Gerard Anaya conducted a Stormwater Inspection at the site to determine its compliance with the National Pollutant Elimination Discharge System (NPDES) permit program and this CEI serves as a follow-up to that inspection.

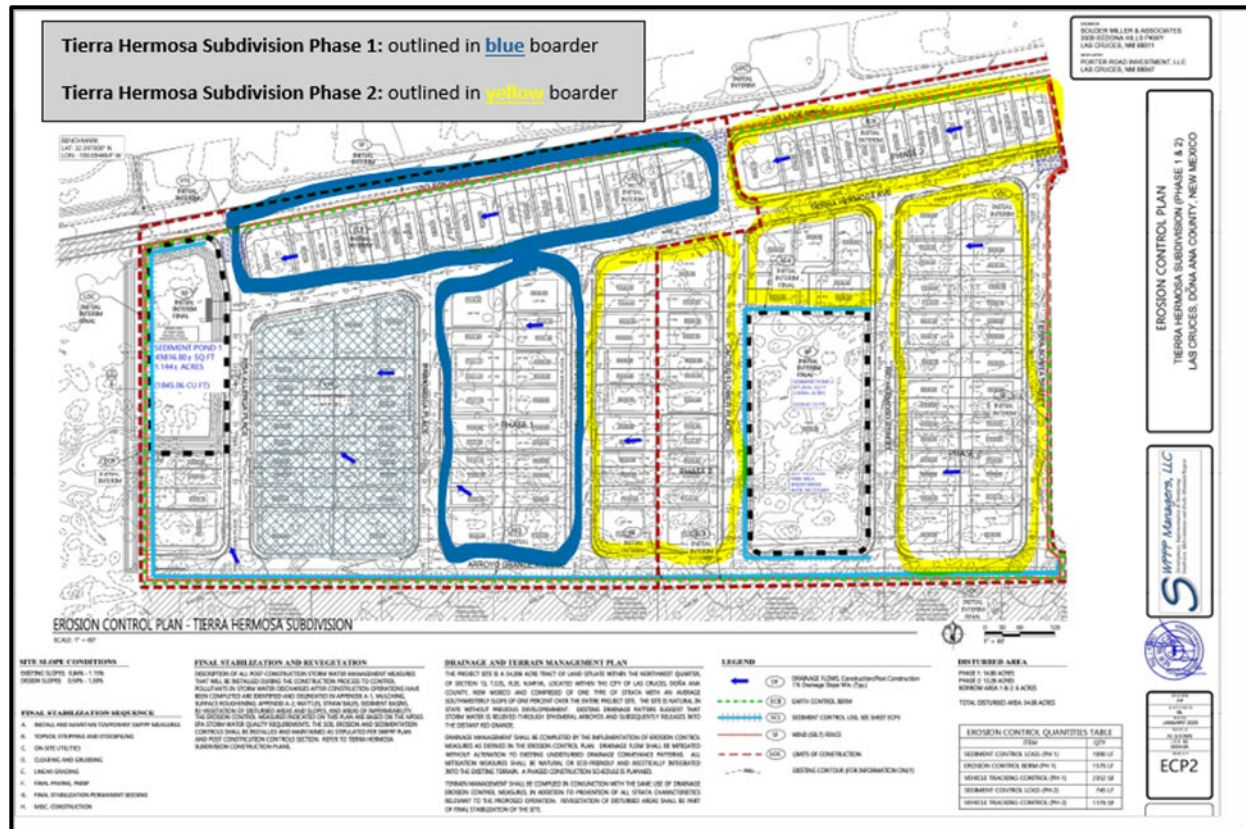
The inspection included a review of THS's Storm Water Pollution Prevention plan (SWPPP) and all associated documentation, along with a physical on-site inspection of the construction site. Mr. Spedalieri accompanied the EPA inspectors throughout the on-site inspection. Before leaving the site, the EPA inspectors conducted a closing conference with Mr. Spedalieri to discuss anticipated requests for additional information and the Areas of Concern (AOCs) identified during the CEI (as detailed in Section III of this report). Mr. Spedalieri was contacted on September 15, 2025, regarding a request for additional documents (as detailed in Section III of this report). This report is based on information, records and reports provided by Mr. Spedalieri, and observations made by the EPA inspectors.

FACILITY DESCRIPTION

The Tierra Hermosa Subdivision Phase I & II site, is a single-family residential development located on the east side of Porter Drive, situated to the south of Village Drive and to the north of the Central Avenue (as indicated in the Aerial Image 1 and the Site Map 1 below). Per the Notice of Intent (NOI) provided by the permittee, A Mountain Construction LLC for the CGP, the geographic coordinates for the site, located in Las Cruces, Doña Ana County, New Mexico, approximate a Latitude 32.397008, and a Longitude - 106.694464. The site encompasses a disturbed area of approximately 27 acres of land and is in the clearing and rough grading construction stage. Water runoff from the entire site is directed towards an on-site drainage retention pond, unnamed arroyos, and subsequently the Rio Grande River.



Aerial Image #1: Overall view of the Tierra Hermosa Subdivision Phase I & II construction site. **Note:** Aerial from Google Maps Imagery, 2025.



1. The following inconsistencies were noted in the SWPPP reviewed on-site:
 - a) Mr. Spedalieri stated that the individual contractors will install paved concrete to prevent erosion and sediment runoff from areas that will not be vegetated after construction is complete; however, these procedures for final stabilization were not documented in the SWPPP. **2022 CGP, Parts 2.2.6 & 2.2.14(a)**
 - b) Corrective action logs for the corrective actions taken by the permittee to ensure that the site's stormwater controls remain in effective operating condition were not included in the SWPPP nor provided by Mr. Spedalieri. **2022 CGP, Part 5.4.1**
2. Earth berms were installed as a perimeter control BMP for the construction site however, the berms were not maintained and compacted to ensure that they continue to work effectively in accordance with (see Appendix 1, Photograph Log, Photo No 4, 5, 10, & 11) **2022 CGP, Part 2.1.4.**
3. The earth berms in place as a BMP were not effective and as a result, accumulations of sediment from the construction site were observed on the roadway and along the curb installations across from the intersection of Village Drive and Nunatak Place. In addition, concrete waste was observed at the curb installations and along the roadway the intersection of Village Drive and Nunatak Place (see Appendix 1, Photograph Log, Photos No 4 & 5). **2022 CGP, Part 2.2.3**
4. While there was a QR code link to the A Mountain Construction LLC company website near the construction trailer in the Phase II region across from Village Drive, the SWPPP Large Construction Site Notice was not posted as required by permit number NMR1006HZ (see Appendix 1, Photograph Log, Photo No 1.) **2022 CGP, Part 1.5**
5. Stabilization techniques were not provided for the entrance and exit point of the construction site across from the intersection of Village Drive and Nunatak Place to minimize the track out of sediment onto the roadway despite the SWPPP detailing a vehicle track out pad as a stabilized construction entrance and exit at that location of the construction site. Sediment carryover and tire tracks were observed leading from the entrance and exit point of the construction site to the roadway (see Appendix 1, Photograph Log, Photo No 6). **2022 CGP, Parts 2.1.2 & 2.2.4**
6. A concrete washout for washing applicators and containers used for concrete was not observed at the construction site despite the SWPPP mentioning concrete waste management measures for on-site washout. **2022 CGP, Part 2.3.4**
7. A rain gauge was not maintained on-site to record any 24-hour period during which there is 0.24 inches or more of rainfall despite the SWPPP having rainfall records with documented dates of rainfall, inches of rain, and the rain gauge being emptied (see Appendix 1, Photograph Log, Photo No 3). City of Las Cruces environment compliance officer Gerard Anaya, present during the CEI inspection, stated that he did observe a rain gauge on site during his inspection on August 12, 2025. **2022 CGP, Part 4.2.3**
8. The fire hydrant near the intersection of Village Drive and Nunatak Place used to assist with dust control was observed leaking causing water to flow onto the road at Village Drive and commingle with visible accumulations of sediment from the construction site (see Appendix 1, Photograph Log, Photos No 7, 8 & 9). **2022 CGP, Part 1.2.2**

The following AOCs are derived from SWPPP documentation provided by Mr. Spedalieri via email on September 16, 2025:

1. The SWPPP documents an update to the Erosion Control Plan (ECP) due to changes to the Grading and Drainage Plan, January 2025, and the addition of an inspector to the SWPPP team, April 2025;

however, there were no corresponding authorized signatures on the SWPPP for these modifications.

2022 CGP, Part 7.4.1

2. There is no documentation that staff training requirements prior to the commencement of earth-disturbing activities or pollutant-generating activities have been met, as the SWPPP training log sheet is blank. **2022 CGP, Part 6**

Section IV – FOLLOW UP

The EPA received the following information on September 16, 2025, after leaving the site on August 27, 2025:

1. Upon request, Mr. Spedalieri provided the following via email:
 - a) A signed and certified copy of the June 2024 SWPPP which includes the NOI and ECP.

Section V – LIST OF APPENDICES

Appendix 1: Photograph Log – 11 photos taken 08/27/2025

Appendix 1
Photograph Log



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 1

Location: Village Drive and Sout East of Coyote Flats Street

City: Las Cruces

County: Doña Ana County

State: NM



Description: View of notice board with QR code link to the A Mountain Construction LLC company website, near the construction trailer at the Phase II region across from Village Drive

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 2

Location: US Highway 70 at Porter Road and Village Drive

City: Las Cruces

County: Doña Ana County

State: NM

A Mountain Construction
SWPPP, Tierra Hermosa Subdivision
City of Las Cruces, Doña Ana County, NM

PROJECT INFORMATION

PROJECT OPERATOR:

Name & Address: A Mountain Construction, LLC
1177 Scoggins Avenue
Las Cruces, NM 88005

Contact Person: Bridget Spedaliere
Operator/Managing Manager
575.639.0733
bsped23@gmail.com

PROJECT OWNER:

Name & Address: Porter Road Investment Group, LLC
1930 Tapestry Circle
Las Cruces, NM 88005

Contact Person: Bridget Spedaliere
Managing Partner
575.639.0733
bsped23@gmail.com

LOCATION OF SITE:

Location : US Hwy. 70 East, North to Porter Road and
Village Drive.
City of Las Cruces, New Mexico

Latitude/Longitude : 32.397008° / -106.694464°

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Description: View of project information, including project owner information, the address and latitude on longitude coordinates for the construction site in the SWPPP.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 3

Location: US Highway 70 at Porter Road and Village Drive

City: Las Cruces

County: Doña Ana County

State: NM

A Mountain Construction
SWPPP: Tierra Hermosa Subdivision
City of Las Cruces, Doña Ana County, NM

SWPPP Managers, LLC
Construction Development & Services
Engineering, Construction and Safety Group

RAINFALL RECORD

Date: 11.07.24	Inches of Rain: 0.23"	Gauge Emptied?: yes
Remarks:		
Date: 11.17.24	Inches of Rain: 0.30"	Gauge Emptied?: yes
Remarks:		
Date: 06.25.25	Inches of Rain: 0.30"	Gauge Emptied?: yes
Remarks:		
Date: 06.27.25	Inches of Rain: 0.53"	Gauge Emptied?: yes
Remarks:		
Date: 07.13.25	Inches of Rain: 0.41"	Gauge Emptied?: yes
Remarks:		
Date: 07.14.25	Inches of Rain: 0.45"	Gauge Emptied?: yes
Remarks:		
Date: 07.18.25	Inches of Rain: 0.61"	Gauge Emptied?: yes
Remarks:		
Date: 07.24.25	Inches of Rain: 0.87"	Gauge Emptied?: yes
Remarks:		

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Description: View of rainfall records with documented rain fall dates, inches of rain, and rain gauge usage in the SWPPP.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 4

Location: Village Drive near Nunatak Place

City: Las Cruces

County: Doña Ana County

State: NM



Description: View of an ineffective BMP (i.e., an unmaintained and uncompacted berm (yellow arrow) at the perimeter of the construction site at Village Drive). Sediment carryover (red arrow) was observed from the construction site onto the roadway along Village Drive. In addition, concrete waste (green arrow) was observed at the curb and along the roadway at Village Drive.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 5

Location: Village Drive near Nunatak Place

City: Las Cruces

County: Doña Ana County

State: NM



Description: A closer view of the unmaintained and uncompacted berm (yellow arrow) at the perimeter causing sediment carryover (red arrow) from the construction site onto the roadway along Village Drive. Concrete waste indicated by green arrow.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 6

Location: Village Drive near Nunatak Place

City: Las Cruces

County: Doña Ana County

State: NM



Description: View of sediment carryover (red arrow) from the entrance and exit point of the construction site onto the access road along Village Drive. In addition, tire tracks were observed leading towards the access road from the construction area (blue arrow).

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 7

Location: Village Drive near Nunatak Place

City: Las Cruces

County: Doña Ana County

State: NM



Description: View of the fire hydrant used for dust control leaking and causing water to flow onto the road at Village Drive and commingle with visible accumulations of sediment (red arrow) from the construction site.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 8

Location: Village Drive near Nunatak Place

City: Las Cruces

County: Doña Ana County

State: NM



Description: View of the fire hydrant used for dust control leaking and causing water to comele with stockpiled sediment (red arrow) near the construction site at the intersection of Village Drive and Nunatak Place.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 9

Location: Village Drive near Nunatak Place

City: Las Cruces

County: Doña Ana County

State: NM



Description: A closer view of stockpiled sediment at the intersection of Village Drive and Nunatak Place comingling with water leaking from the fire hydrant.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 10

Location: Porter Drive near Central Avenue

City: Las Cruces

County: Doña Ana County

State: NM



Description: View of an ineffective BMP (i.e., an unmaintained and uncompacted berm (red arrow) across from an arroyo (green arrow) on the construction site at Porter Drive and Central Avenue). When it rains, stormwater flows through the construction site via the noted arroyo: this stormwater washes away the perimeter berm, causing sediment to flow off-site onto the roadway.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson



A Mountain Construction LLC
Tierra Hermosa Subdivision Phase I & II
CGP Permit No. NMR1006HZ
Inspection Date: 08/27/2025

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1: Photograph Log

Photo No. 11

Location: Porter Drive near Central Avenue

City: Las Cruces

County: Doña Ana County

State: NM



Description: A closer view of the location of the arroyo (green arrow) on the construction site at Porter Drive and Central Avenue.

Date of Photo: 08/27/2025 Photographer: Kamilah Hutchinson