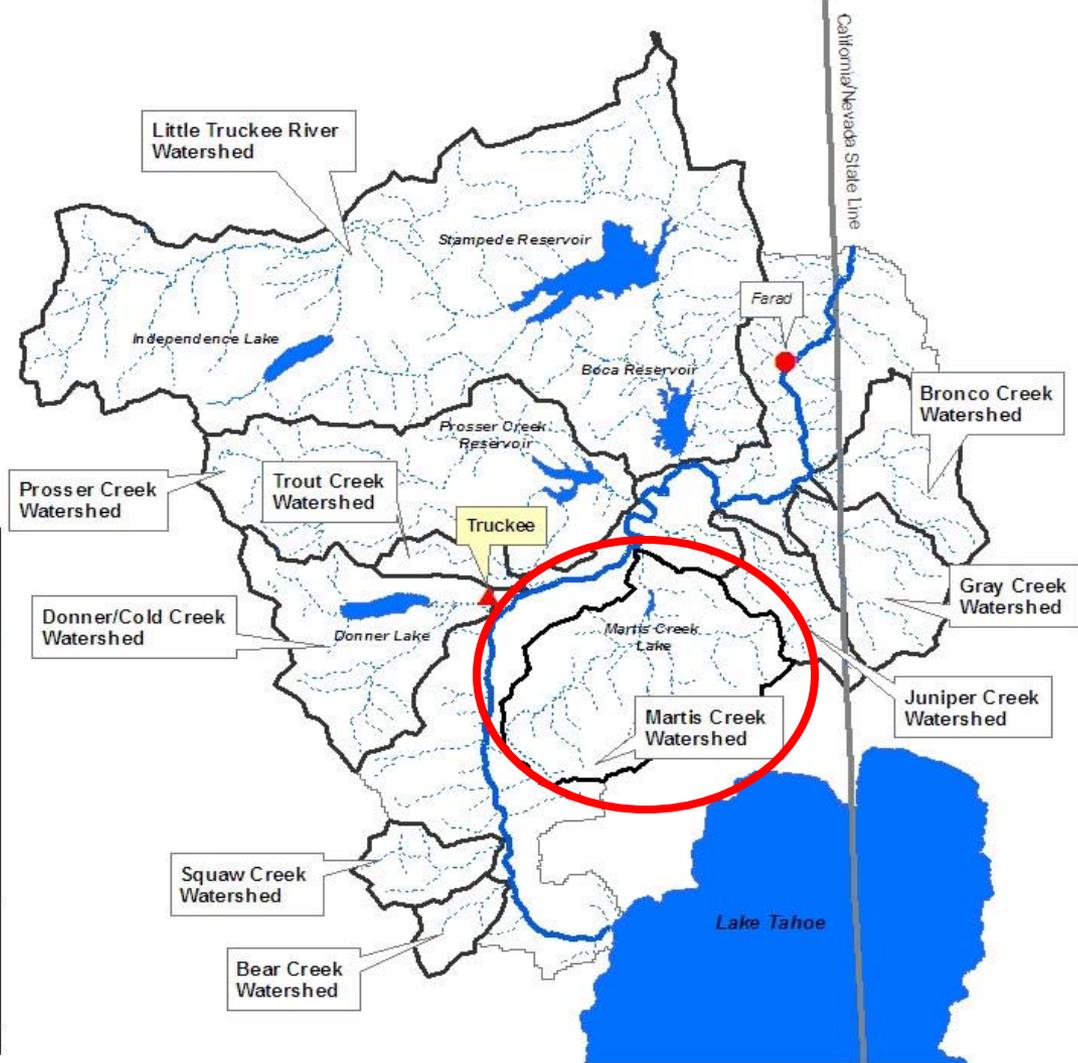


# A Success Story with Lessons

Northstar Mountain Properties Development  
Truckee, California

Scott Ferguson, Senior WRCE  
Lahontan Regional Water Quality Control Board



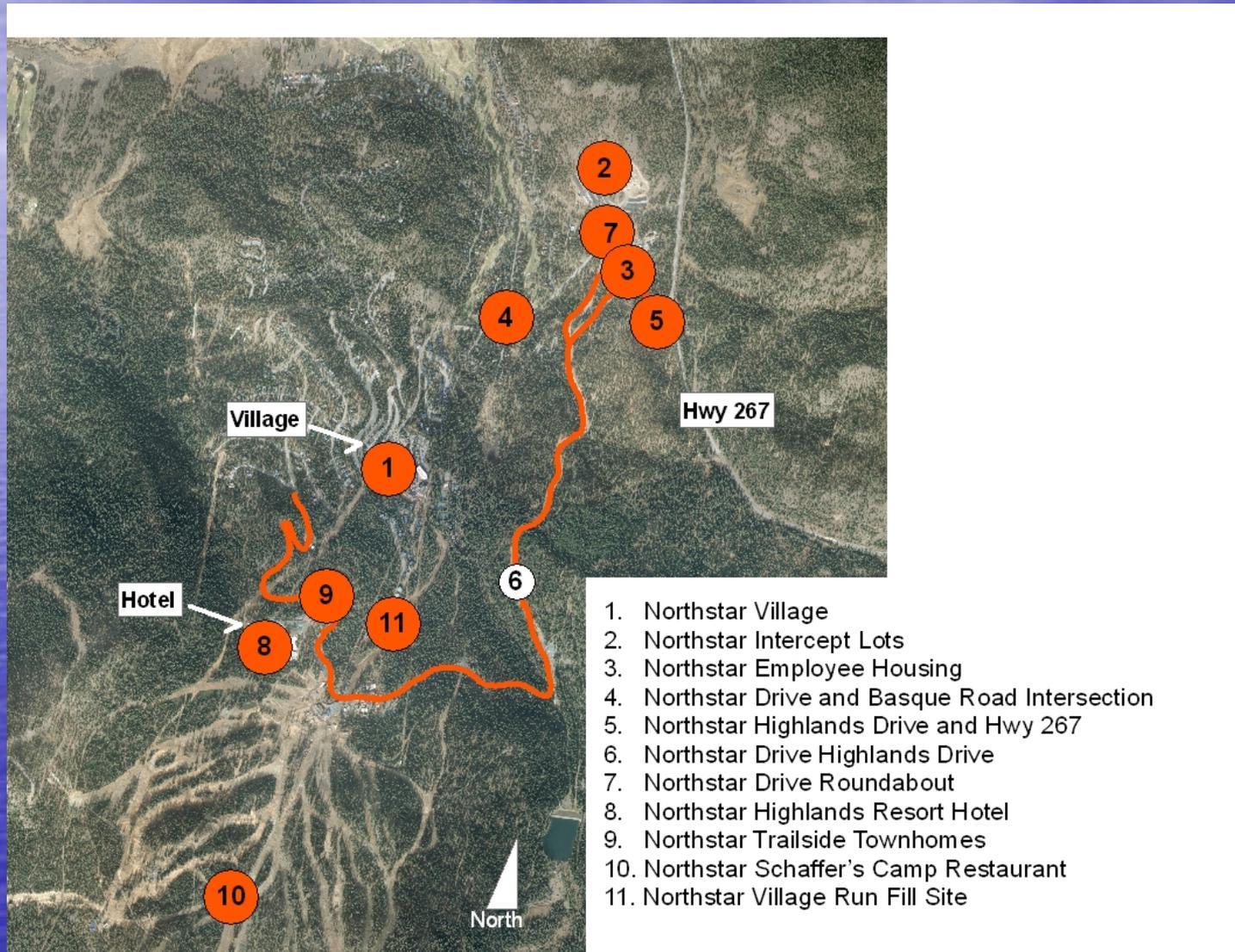
# Leading Up to 2006

- Village Construction started in 2004
  - Numerous inspections
  - Numerous violations and NOVs
- Winter/spring of 2004/2005
  - NMP increases environmental training in preparation of 2005 construction season
  - Water Board staff assists/participates in training

# Leading up to 2006

- 2005 construction season
  - Still have violations,
    - Less severe in nature
    - Better response
  - NMP demonstrates it understands what is necessary for compliance and that water quality is a high priority

# NMP Projects - 2006



# 2006 Construction Season

- Projects increase to a total of 11
  - New four-mile road
  - New parking lot facilities
  - New residential development
  - New hotel
  - Creek crossings
- Approximately 340 acres under development

# 2006 Water Board Activity Inspections

- Inspections
  - Four inspections (mid-June and early August)
  - Two inspections in November

# June 15, 2006 (Road Construction)



# June 15, 2006 (Stream and Floodplain Encroachment)



# July 5, 2006 (Staging and Materials Handling)



# July 5, 2006 (Road Construction)



# July 5, 2006 (Stockpile Management)



# July 5, 2006 (Stockpile Management)



# July 5, 2006 (Stockpile Management)



# July 5, 2006 (Unprotected Culvert Outfalls)



# August 7, 2006 (Sediment Tracking)



# Water Board Enforcement Through October 2006

- Verbal communication with each inspection and in between
- Three Notices of Violation
  - Submit report documenting response
  - Submit inspection reports
  - Submit photo documentation
- Limited effectiveness

# October 30, 2006



November 2, 2008



# October 26, 2006



October 25, 2006



November 3, 2006



November 3, 2006



November 3, 2006

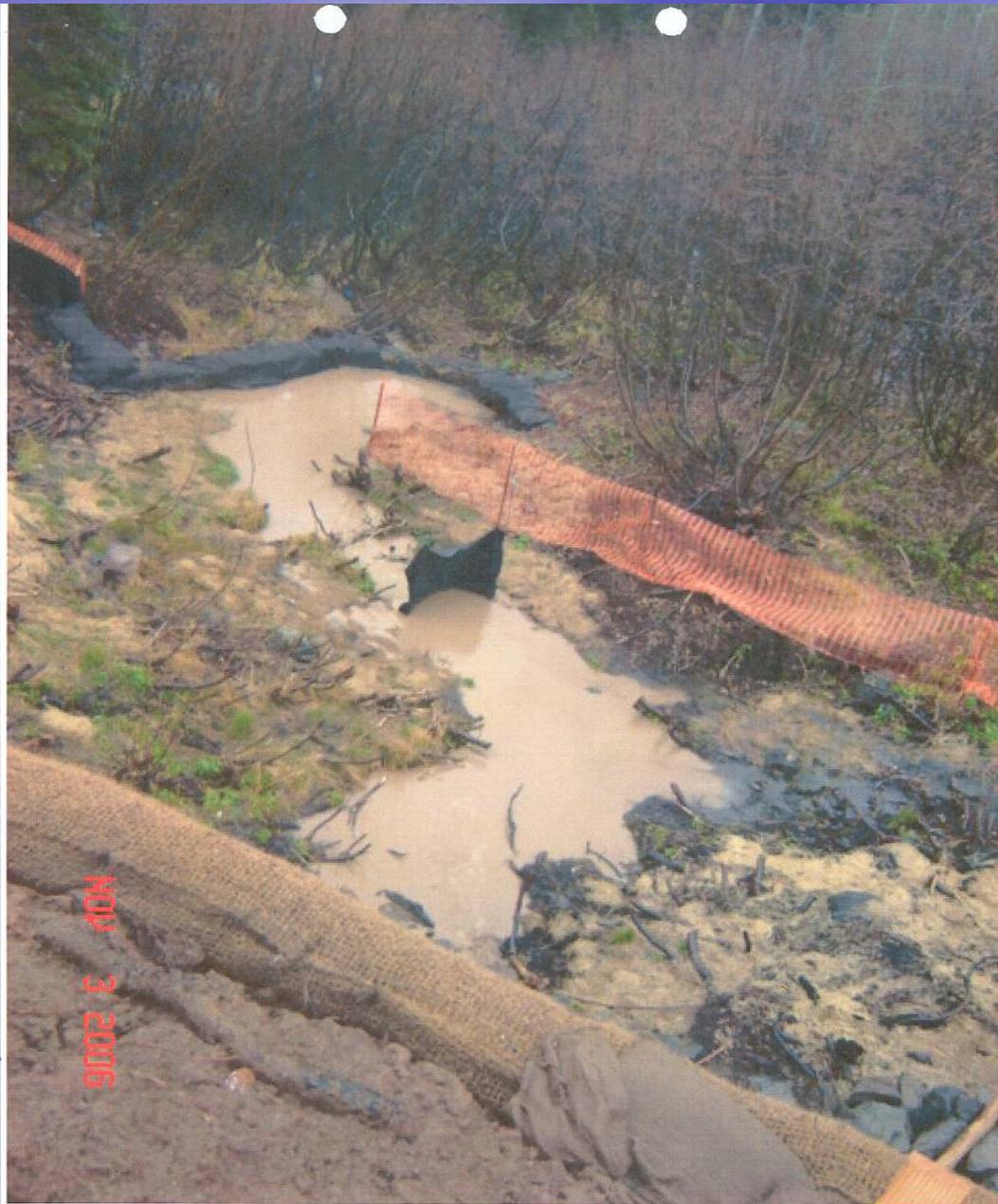


November 3, 2006





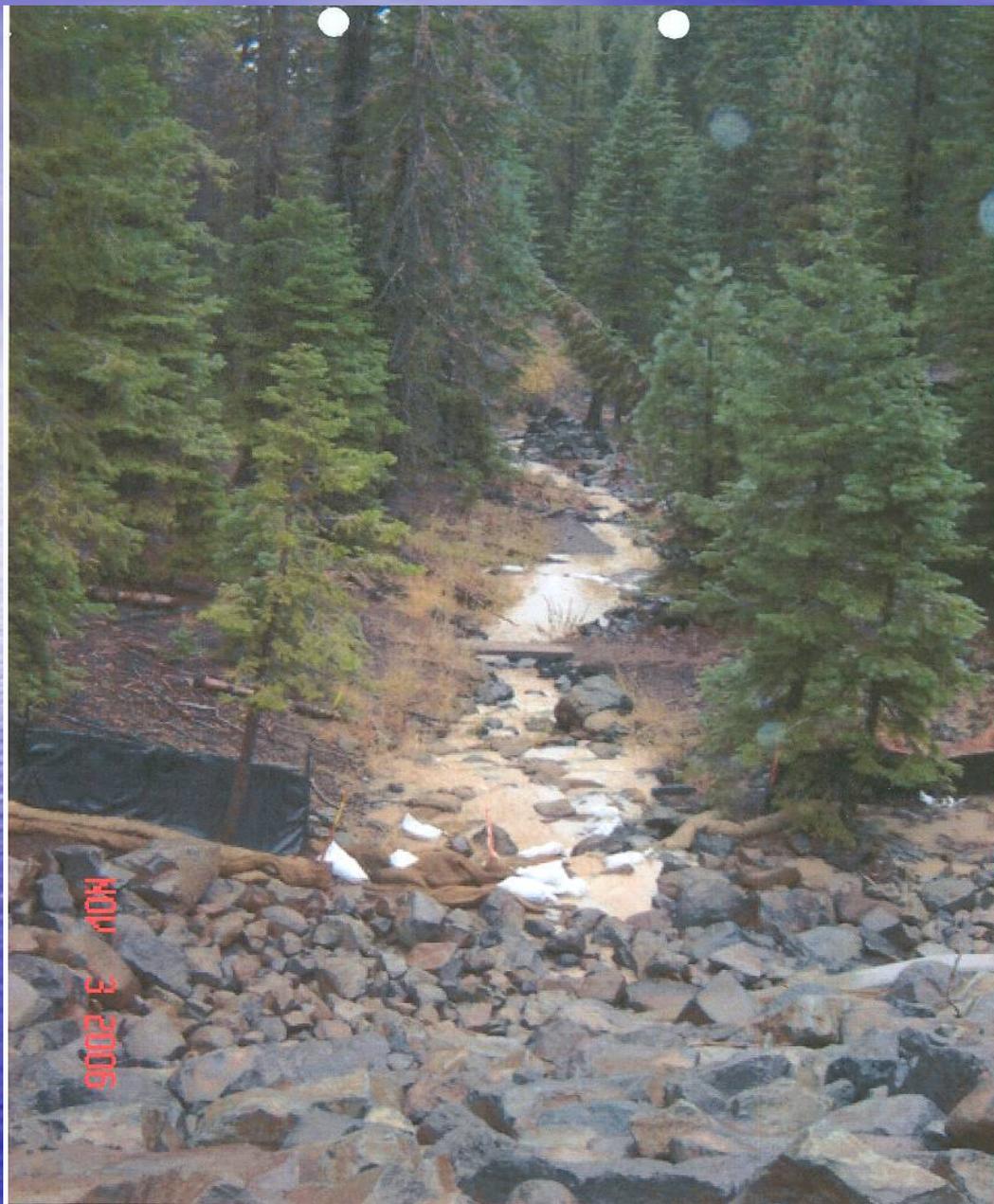
November 3, 2006



November 3, 2006



November 3, 2006



November 3, 2006

# Additional Enforcement Actions

- Cleanup and Abatement Order
  - Resulted in additional BMP implementation/soil stabilization
  - Submit reports documenting what was done with photos
  - Develop and implement robust monitoring program to evaluate BMP effectiveness and document water quality impacts

# Additional Enforcement Actions

- Met with developer and contractor executives
  - Shared estimated potential maximum liability
- Participated in training

# The Results

2007 Construction Season

Violation Free

# Additional Enforcement Actions

- Proposed settlement
  - \$2.75 million liability
  - Includes \$600,000 cash
  - Includes \$2.15 million SEP
- Straight to an ACL Order

# Lessons to Keep in Mind

- Even though compliance is a primary goal, document with enforcement in mind
  - Photos, sampling/data, interviews/discussions
  - Quick and complete documentation
  - Clearly identify violations
  - Have discharger monitor/produce information

# Lessons to Keep in Mind

- Coordinate with other agencies
- Escalate enforcement quickly