

STATE OF COLORADO

Bill Ritter, Jr., Governor
James B. Martin, Executive Director

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

4300 Cherry Creek Dr. S. Laboratory Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
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Located in Glendale, Colorado
<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

October 15, 2009

Chris Diamond
Steamboat Ski & Resort Corporation
2305 Mt. Werner Circle
Steamboat Springs, CO 80487

RE: Final Expedited Settlement Agreement, Number: ES-091014-1

Dear Mr. Diamond,

Enclosed for Steamboat Ski & Resort Corporation's records, you will find Steamboat Ski'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 enforceable and constitutes a final agency action. As specified in the enclosed ESA, Steamboat Ski must, within fifteen (15) calendar days, submit a certified or cashier's check for the amount specified in the ESA to the Water Quality Control Division for this matter to be resolved.

If you have any questions, please do not hesitate to contact me at (303) 692-3598 or by electronic mail at michael.harris@state.co.us.

Sincerely,

Michael Harris
Enforcement Unit
WATER QUALITY CONTROL DIVISION

Enclosure(s)

cc: Aaron Urdiales, EPA Region VIII
Nathan Moore, Permits Unit, CDPHE



Colorado Department of Public Health & Environment
Water Quality Control Division

EXPEDITED SETTLEMENT AGREEMENT

Number: ES-091014-1

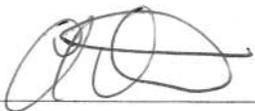
The Colorado Department of Public Health and Environment (“Department”), through the Water Quality Control Division (“Division”), issues this Expedited Settlement Agreement (“ESA”), pursuant to the Division’s authority under §§25-8-602, 25-8-605 and 25-8-608, C.R.S. of the Colorado Water Quality Control Act (the “Act”) §§25-8-101 to 703, C.R.S., and its implementing regulations, with the express consent of Steamboat Ski & Resort Corporation (“Steamboat Ski”). The Division and Steamboat Ski may be referred to collectively as “the Parties.”

1. Steamboat Ski 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. Steamboat Ski is involved in construction activities of ski resort trail and chairlift improvements on property located at or near 2305 Mt. Werner Circle, in or near the City of Steamboat Springs, Routt County, Colorado (the “Project”).
3. Steamboat Ski failed to comply with the provisions of its Colorado Discharge Permit System (“CDPS”) General Permit for Stormwater Discharges Associated with Construction Activity (the “Permit”), Certification Number COR-03C126, as described in the attached inspection report.
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 \$19,250.00.
5. By accepting this ESA, Steamboat Ski neither admits nor denies the violations or deficiencies specified herein and in the attached inspection report.
6. Steamboat Ski 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, Steamboat Ski 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. Steamboat Ski agrees to the terms and conditions of this ESA. Steamboat Ski 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, Steamboat Ski 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 of Administrative Enforcement Actions Policy,” which includes a thirty-day public comment period. The Division and Steamboat Ski 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.

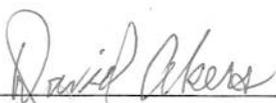
9. This ESA constitutes a final agency order or action upon the date when the Executive Director or his designee signs the ESA and effectively imposes the civil penalty.
10. Steamboat Ski agrees that within fifteen (15) calendar days of receiving the signed and final ESA from the Division, Steamboat Ski 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:

Michael Harris
 Colorado Department of Public Health and Environment
 Water Quality Control Division
 Mail Code: WQCD-CADM-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 Steamboat Ski'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 Steamboat Ski. Steamboat Ski agrees not to challenge the use of the cited violations for any such purpose.
12. This ESA, when final, is binding upon Steamboat Ski 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 STEAMBOAT SKI & RESORT CORPORATION:

	7/16/09
Signature	Date
Chris Diamond	President, CSU
Name (printed)	Title

FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT:

	Date: 10/14/09
for Lori M. Gerzina, Manager Compliance Assurance Section WATER QUALITY CONTROL DIVISION	

STATE OF COLORADO

Bill Ritter, Jr., Governor
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Colorado Department
of Public Health
and Environment

June 30, 2008

CERTIFIED NO: 7007-0220-0001-0159-3511

Doug Allen, VP
Steamboat Ski & Resort Corp
2305 Mt Werner Cir
Steamboat Springs, CO 80487

Re: Facility Inspection / **Compliance Advisory**
Steamboat Ski & Resort Corp — Base Area Regrading Project
CDPS Permit No. COR03 C126
Routt County

Dear Mr. Allen,

An inspection of the above-referenced facility was conducted by the Water Quality Control Division (the Division) on June 4, 2008. The inspection procedure consists of two parts: a review of records, and an on-site facility inspection. Findings associated with the inspection are detailed in the enclosed inspection report.

The Division expects you to correct the findings noted in the enclosed inspection report and submit an explanation on how each finding was corrected. Pursuant to Part II.B.2 of the Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (the permit), you must submit the requested materials to the Colorado Department of Public Health and Environment, WQCD-P-B2, 4300 Cherry Creek Drive South, Denver, CO 80246-1530, Attn: Kathleen Rosow, by **July 14, 2008**.

This Compliance Advisory is intended to advise you of possible violations of the Colorado Water Quality Control Act, its implementing regulations and permits, so that you may take appropriate steps to avoid or mitigate formal enforcement action. This Compliance Advisory does not constitute a Notice of Violation or Cease and Desist Order and is not subject to appeal. However, the issuance of this Compliance Advisory does not limit or preclude the Division from pursuing its enforcement options. The Division is currently evaluating the facts and if a formal enforcement action is deemed necessary, you may be issued a Notice of Violation / Cease and Desist Order that may include the assessment of penalties.

If you have any questions, please call me at (303) 692-3521. Thank you for your time and cooperation.

Sincerely,

Kathleen Rosow
Environmental Protection Specialist
Industrial Permits Unit
WATER QUALITY CONTROL DIVISION

cc: Aaron Urdiales, EPA Region 8
Local Health Department
Lance Miles, Steamboat Ski & Resort Corp, 2305 Mt Werner Cir, Steamboat Springs, CO 80487
Nathan Moore, Water Quality Control Division
File Copy

Stormwater Inspection Report

Permittee: Steamboat Ski & Resort Corp.
(SSRC)

Cert. No.: COR-03 C126

Date: 06/04/2008

Facility: Base Area Regrading Project

Industrial Type: Construction

Receiving Water: Burgess Creek to
Yampa River

Facility Address: 2305 Mt. Werner Circle, Steamboat Springs, Routt County, Colorado

Persons present: Frank Case, David Crisler, Lance Miles, Dave Tegtmeyer (SSRC); Lyn Halliday (Environmental Solutions Unltd, LLC); Greg Gunn, Laura Blazey (City of Steamboat Springs); Nathan Moore, Maura McGovern, Kathy Rosow (CDPHE (WQCD))

Facility Representative(s)/Title(s): Lance Miles (Project Coordinator)

Inspector(s): Kathy Rosow, CDPHE (WQCD)

Inspection Findings

Pursuant to all provisions of the Colorado Discharge Permit System General Permit for Stormwater Discharges Associated with Construction Activity (permit), the findings listed below must be corrected.

Records Review

Note: The permit certification effective date was June 20, 2007. The date that construction started and land-disturbing activities began at the site was June 21, 2007 as provided by Lance Miles (Project Coordinator).

Note: The Division highly suggests that the SWMP guidance (Appendix A of the Stormwater Construction General Permit Application) be followed when preparing a SWMP to ensure that all required items are appropriately and clearly addressed, and the resulting document is easy to use in the field or when evaluating site compliance with permit requirements. This document can be found on the Division's webpage at www.cdphe.state.co.us/wq/PermitsUnit.

1. A copy of the Stormwater Management Plan was retained on site. The SWMP was reviewed during the inspection and found to be inadequate for the following reasons:
 - a. The section in the SWMP on Stormwater Management Controls did not include the gravel hard-armor and rock sock culvert protection BMPs identified during the facility inspection at the SW corner of the facility, or the vegetative buffer located north of the ski lift in the NE portion of the facility. The SWMP shall clearly describe and locate all practices implemented at the site to minimize erosion and sediment transport, as required by Part I.C.3.c. of the permit. The SWMP must be updated to include this information.
 - b. The section in the SWMP on Inspection and Maintenance did not document the responsibility for maintenance of the south perimeter diversion ditch BMP, used by both SSRC and One Steamboat Place, to ensure the BMP is maintained in good and effective operating condition. The SWMP must be updated to include this information as required by Part I.C.5 of the permit.
2. Inspection records were available, but were inadequate, as they were not conducted as required in Part I.D.6 of the permit. Specifically, documentation of the Winter Condition Inspection Exclusion (dates when snow cover occurred, date when construction activities ceased, and date melting conditions began) was not included in the inspection record, and corrective actions were not consistently documented for inspection findings (e.g., corrective actions not documented in reports dated 8/1/2007, 9/14/2007, 9/30/2007, and 10/14/2007). Inspections must be conducted in accordance with Part I.D.6 of the permit.

Note: inspections must be conducted at least every 14 days and after any precipitation or snowmelt event that causes surface erosion, except during winter snow pack conditions where no melting is occurring, or when all construction activities are completed. During winter snow pack conditions where no melting is occurring, no inspections need to be conducted.

When all construction activities are completed but final stabilization has not been achieved due to a vegetative cover that has been planted but has not become established, inspections must be conducted at least once a month.

Facility Inspection

Note: A stormwater complaint was received by the Division on May 8, 2008 via EPA Region 8, regarding a visible sediment discharge from disturbed areas located at the Base Area Regrading Project to Burgess Creek, and subsequently to Casey's Pond and the Yampa River. Photographic documentation included with the complaint indicates erosion and sediment transport at the site, and a sediment-laden discharge from the site to Burgess Creek (State waters).

Note: All Best Management Practices (BMPs) mentioned in the below findings must be installed according to specifications and installation criteria outlined in the SWMP. These specifications and installation criteria must meet best engineering practice requirements.

3. It was noted during the inspection that inadequate diversion ditch BMPs were implemented at the site to prevent erosion and sediment discharge from upgradient disturbed areas to the drop inlets connected to Burgess Creek (State waters), located at the bottom of the ski slope, along the western portion of the site.

The diversion ditch BMPs were implemented for erosion and sediment control of the steep disturbed areas at the site. Diversion ditches were installed parallel to the direction of flow down the disturbed slopes in four locations at the site: along the north perimeter, two up the middle of the site (on either side of the ski lift), and along the south perimeter. Specific locations depicted in this report include:

- i) at the SE portion of the site, midway up the slope (south perimeter ditch) (see attached photograph 5),
- ii) at the NW corner of the site (interior ditch) (see attached photographs 12, 13 and 15),
- iii) at the SW portion of the site (interior ditch) (see attached photograph 14) and,
- vi) at the SW corner of the site (south perimeter) (see attached photograph 24).

Runoff was directed to the diversion ditches by water bars (see related Finding #5 below), and numerous BMPs were implemented in the diversion ditches themselves (see related Finding #6 below). Run-on to the ditches from adjacent disturbed areas was not controlled, and the ditches themselves were not stabilized. The diversion ditches directed flow through lined sediment ponds fitted with dewatering bags before discharging to the inlet structures to (underground) Burgess Creek, at the base of the slope.

The diversion ditches implemented on the site are not functioning as adequate BMPs for erosion control or sediment removal. Diversion ditch BMPs are intended to be placed perpendicular to the slope, so that drainage is provided along the contour. Diversion ditches are not intended for large drainage areas, and should be stabilized to protect against erosion and failure.

Because the diversion ditches were installed parallel to the direction of flow down the disturbed slope, and are fed by waterbars across the slope, both the volume and velocity of runoff increases as water travels down the ditches, resulting in concentrated flow and scouring of the ditch sides and bottoms. Therefore, the diversion ditches are acting as a conveyance of eroded sediment down the disturbed slope, as evidenced by the discharge of sediment down the ditches toward the inlet structures (State waters) at the base of the slope.

Because the diversion ditches are not functioning as an adequate BMP for erosion control or sediment removal, and the potential exists for the discharge of sediment to State waters, either the ditches must be modified to provide erosion control or sediment removal, or adequate BMPs must be implemented for all disturbed areas onsite to prevent sediment discharge to the detention ditches.

4. It was noted during the inspection that BMPs were not implemented, or were inadequate, across the site to prevent erosion and sediment discharge from uncontrolled sheet flow across upgradient disturbed areas. As a result, there was a potential for discharge of sediment to the downgradient drop inlets connected to Burgess Creek (State waters) located at the bottom of the ski slope, along the western portion of the site. Specific examples include:
 - a. Inadequate BMPs were implemented along the disturbed slope at the northwest portion of the site, between the north perimeter diversion ditch and the erosion control blanketed slopes south of the diversion ditch (see attached photograph 1). The water bars implemented diagonally at intervals across the disturbed slope are inadequate to handle the upslope drainage area as the sole BMP for this area (see related Finding #5). Adequate BMPs must be implemented to prevent discharge of sediment from this disturbed slope area.
 - b. No BMPS were implemented along the disturbed slopes located: i) at the northwest portion of the site, upgradient of the inlet adjacent to the Christy 6 sediment pond (see attached photograph 2) and, ii) at the western portion of the site, upgradient of the inlet located south of the Christy 6 sediment pond (see attached photograph 3). BMPs were not installed to control sheet flow and sediment transport down the disturbed slope toward these inlets. While inlet protection was observed for the drop inlets at the base of the disturbed slope (Dandy Bag, straw bale protection), this BMP is intended to be used as a polishing measure, not as a primary sediment trapping device. Upgradient erosion and sediment control BMPs must be implemented to prevent the discharge of sediment from this disturbed slope area.
 - c. Inadequate BMPs were implemented along the disturbed slope located at the southwest portion of the site, adjacent to the south perimeter diversion ditch (see attached photograph 4). The surface roughening BMP implemented on the disturbed slope is inadequate to handle the upslope drainage area as the sole BMP for this area. Adequate BMPs must be implemented to prevent discharge of sediment from this disturbed slope area.
 - d. No BMPS were implemented along the disturbed slopes located: i) at the southeast portion of the site, south of the south perimeter diversion ditch (see attached photograph 5), ii) at the far eastern portion of the site (see attached photograph 6) and, iii) at the far north-eastern portion of the site, downslope and adjacent to the ski lift (see attached photograph 7). BMPs were not installed to control sheet flow and sediment transport down the disturbed slopes, and the slopes themselves were not stabilized. Adequate BMPs must be implemented to prevent discharge of sediment from these disturbed slope areas.
5. It was noted during the inspection that inadequate waterbar BMPs were implemented at the site to prevent erosion and sediment discharge from upgradient disturbed areas to the drop inlets connected to Burgess Creek (State waters), located at the bottom of the ski slope, along the western portion of the site.

The waterbar BMPs were implemented for erosion and sediment control of the steep disturbed slopes at the site. Waterbars were installed diagonally across the disturbed slopes, and directed flow to the unstabilized diversion ditches referenced in Finding #3. Specific examples noted during the inspection include waterbars installed: i) at the NW corner of the site (see attached photograph 8), ii) at the SW corner of site (see attached photograph 9), iii) at the S edge of site – approximately midsite (see attached photograph 10) and, iv) at the eastern portion of site (see attached photograph 11).

The waterbars implemented on the site are not functioning as adequate BMPs for erosion control or sediment removal. Specifically, the waterbars were not installed according to the installation detail provided in the SWMP—they were not compacted, and did not have checks dams implemented along the length of the water bar. Furthermore, they were not spaced frequently enough for the slope of the disturbed areas, and were directing flow to unstabilized outlets (the diversion ditches). As a result, there was a potential for erosion and failure of the waterbars, concentrated flow and scouring along the bottom of the waterbars, conveyance of sediment to the diversion ditches, and subsequent discharge of sediment down the diversion ditches toward the downgradient drop inlets. Adequate BMPs must be implemented and installed correctly to prevent discharge of sediment from upgradient disturbed slope areas.

6. It was noted during the inspection that BMPs were installed incorrectly or required maintenance in diversion ditches across the site. As a result, there was a potential for erosion and sediment discharge, due to concentrated flow in the diversion ditches, to the downgradient drop inlets connected to Burgess Creek (State waters) located at the bottom of the ski slope, along the western portion of the site. Specific examples include:
 - a. The rock check dams in the diversion ditch located in the NW corner of the site were not installed according to the installation detail provided in the SWMP—the gravel size used for the check dams did not meet the size requirements in the installation detail (see attached photographs 12 and 13). Adequate BMPs must be implemented and installed correctly to prevent erosion and discharge of sediment from the diversion ditches across the site.
 - b. BMPs for maintenance were not implemented for the rock check dams in the diversion ditch located in the SW portion of the site (see attached photograph 14). Sediment had accumulated to more than ½ the height of the dams, and there was evidence of erosive concentrated flow and sediment transport along the bottom of the ditch, and over the check dams. While some sediment will accumulate behind check dams, this BMP is not intended to be used as a primary sediment trapping device. Adequate BMPs must be implemented and maintained to prevent erosion and discharge of sediment from the diversion ditches across the site.
 - c. BMPs for maintenance were not implemented for the straw bale check dams in the diversion ditch located at the NW corner of the site (see attached photographs 15 and 16). Sediment had accumulated to the top of the dams, and there was evidence of erosive concentrated flow and sediment transport along the bottom of the ditch, and over the check dams. Adequate BMPs must be implemented and maintained to prevent erosion and discharge of sediment from the diversion ditches across the site.
 - d. The erosion control blanket BMPs located in: i) the diversion ditch located at the NW corner of the site, leading to the inlet adjacent to the Christy 6 sediment pond (see attached photograph 17), and ii) in the western-most water bar draining to the south perimeter diversion ditch in the SW corner of site (see attached photograph 18), were not installed according to the installation detail provided in the SWMP. The edges of the blanket were not secured (entrenched) to prevent undercutting. Adequate BMPs must be implemented and installed correctly to prevent erosion and discharge of sediment from the diversion ditches across the site.
7. It was noted during the inspection that erosion control blanket BMPs were not adequately maintained to prevent erosion and sediment discharge from site disturbed areas. Specific locations noted during the inspection include erosion control blankets installed: i) in the NW corner of site, at base of Christy Peak Express Lift (see attached photograph 19) and, ii) NE edge of site at the top of the slope adjacent to the Christy Peak Express Lift (see attached photograph 20). In both locations, the erosion control blankets were no longer covering the disturbed slope, and erosion of the slope (rill formation) was evident. As a result, there was a potential for discharge of sediment to the downgradient drop inlets connected to Burgess Creek (State waters) located at the bottom of the ski slope, along the western portion of the site. Adequate BMPs must be implemented and maintained to prevent erosion and discharge of sediment from site disturbed areas.
8. It was noted during the inspection that BMPs were installed incorrectly and required maintenance at the inlet structures to Burgess Creek (State waters) located at the base of the ski slope (see attached photographs 2 and 3). Specifically, the straw wattle BMPs implemented on top of the straw bale BMPs were not entrenched, and are intended to be implemented on the ground so that an appropriate seal can be established. Furthermore, significant sediment was noted both adjacent to the straw bales inlet protection (photograph 2), and inside the inlet protection (photograph 3). As a result, there was a potential for discharge of sediment to Burgess Creek (State waters). Adequate BMPs must be implemented and maintained to prevent discharge of sediment from to the inlet structures to Burgess Creek.

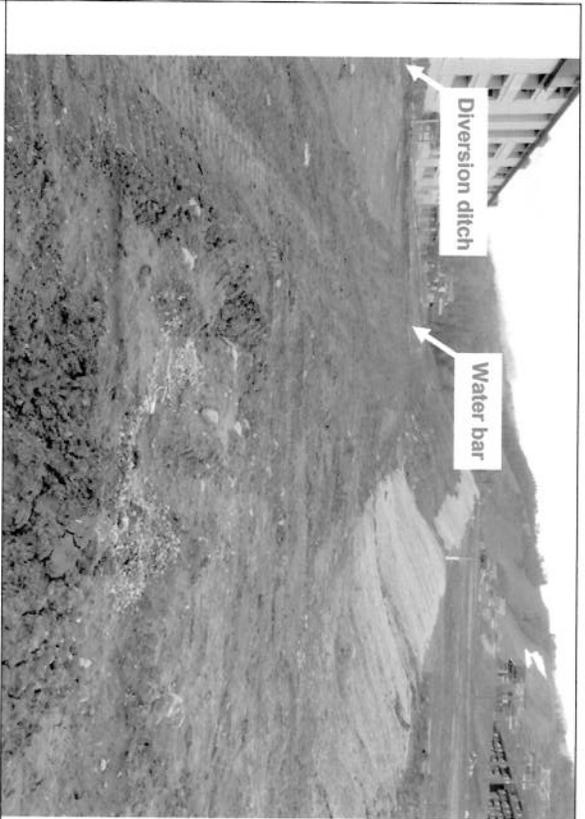
9. It was noted during the inspection that inadequate BMPs were implemented to prevent the discharge of sediment-laden water from a "pond" located at the base of the Christy Peak Express Lift, into the perforated riser pipe, which leads to Burgess Creek (State waters) (see attached photographs 21 and 22). The straw bale inlet protection adjacent to the riser pipe did not surround the entire structure, and the disturbed slope adjacent to the riser pipe was not stabilized. As a result, there was a potential for discharge of sediment to Burgess Creek (State waters). Adequate BMPs must be implemented and maintained to prevent discharge of sediment from to the inlet structures to Burgess Creek.

10. It was noted during the inspection that the culvert inlet and outlet located at the eastern portion of site, under the ski lift structure, were not installed with adequate inlet and outlet protection, resulting in erosion and scour of the disturbed areas surrounding the culvert inlet and outlet (see attached photographs 23 and 7). As a result, there was a potential for discharge of sediment to the downgradient drop inlets connected to Burgess Creek (State waters) located at the bottom of the ski slope, along the western portion of the site. All culverts at the facility must be installed with adequate inlet and outlet protection.

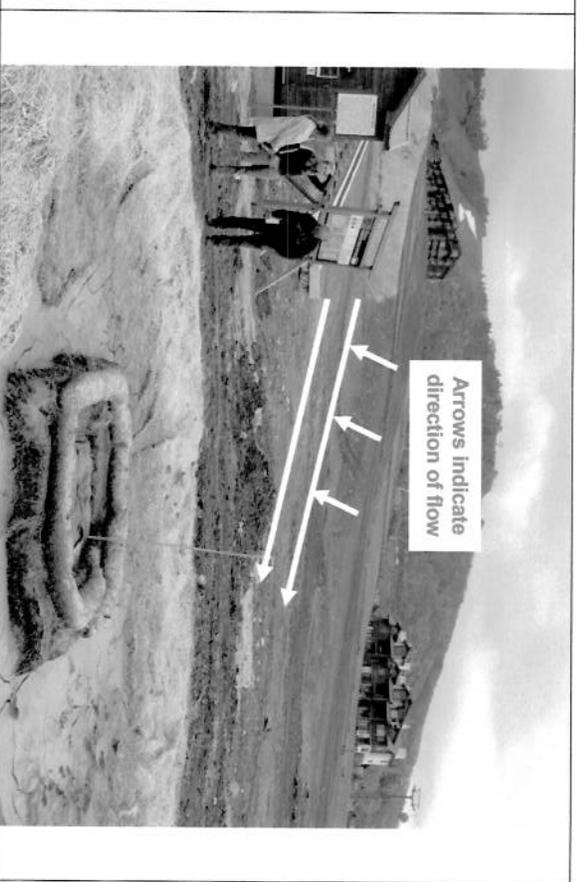
Site Photographs

Base Area Regrading Project
2305 Mt. Werner Circle
Rout County, Colorado

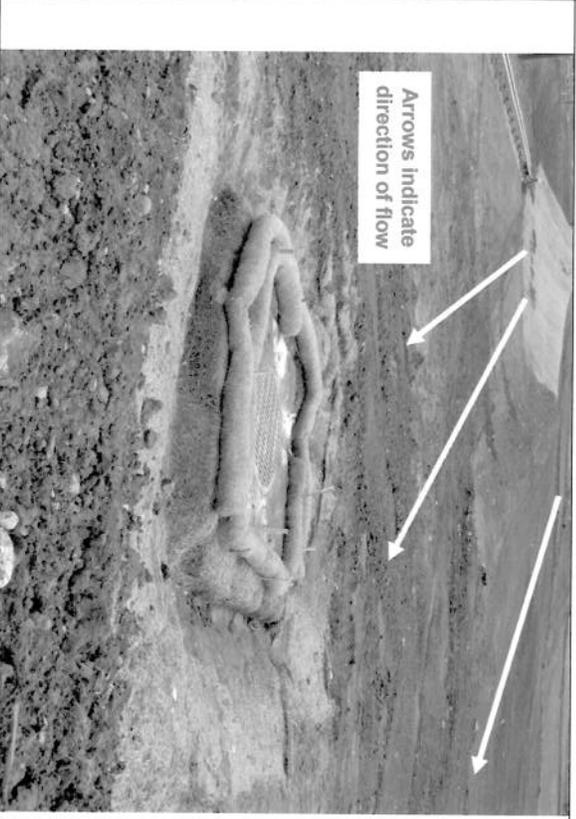
Photograph date: June 4, 2008



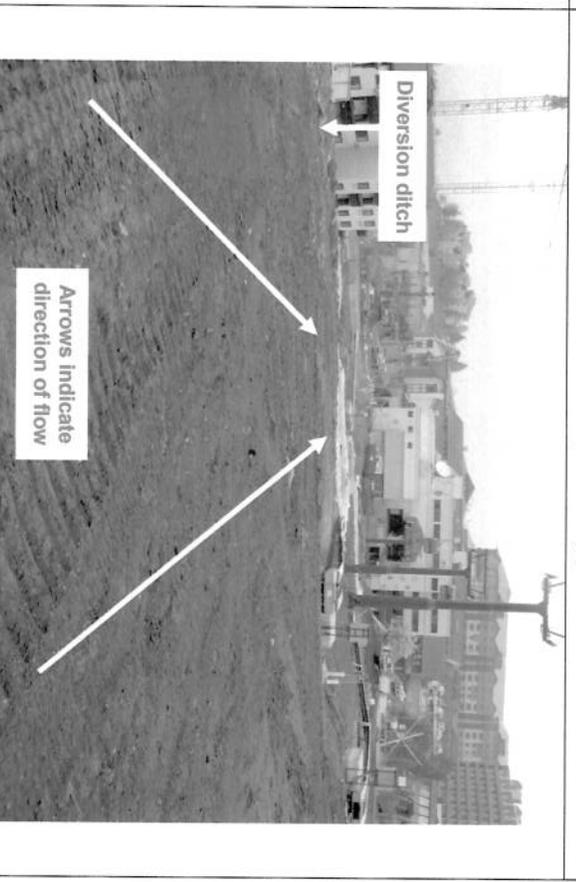
Photograph 1—NW corner of site. Looking E, at upgradient disturbance.



Photograph 2—NW corner of site. Looking ESE at upgradient disturbance.



Photograph 3—W portion of site. Looking E across inlet at upgradient disturbance.

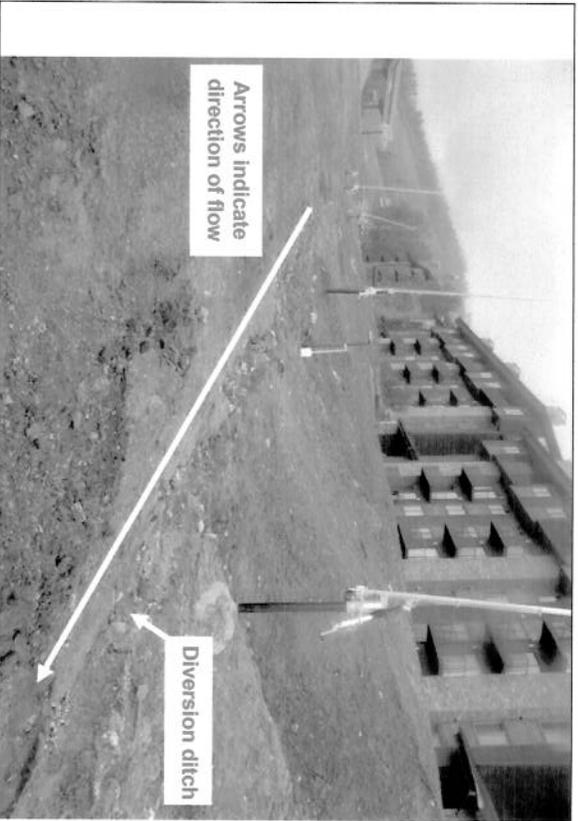


Photograph 4—SW portion of site. Looking W at downgradient disturbance.

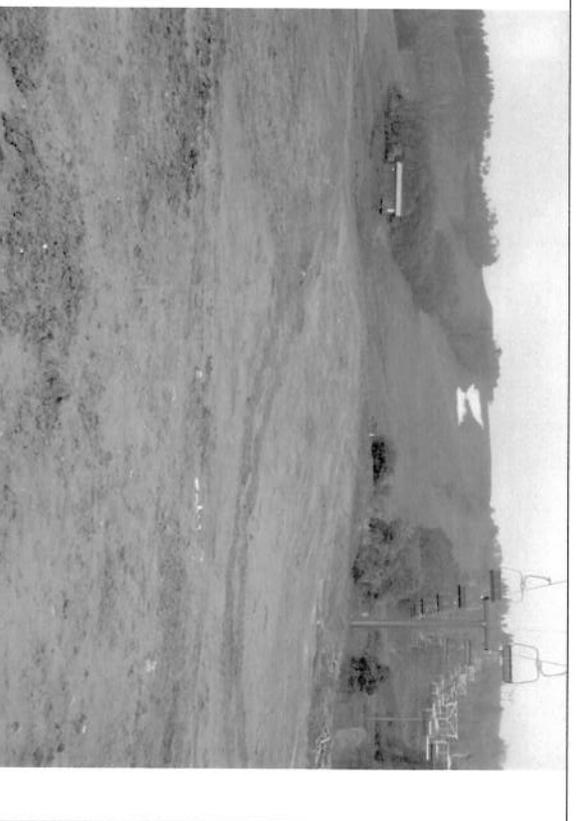
Site Photographs

Base Area Regrading Project
2305 Mt. Werner Circle
Rout County, Colorado

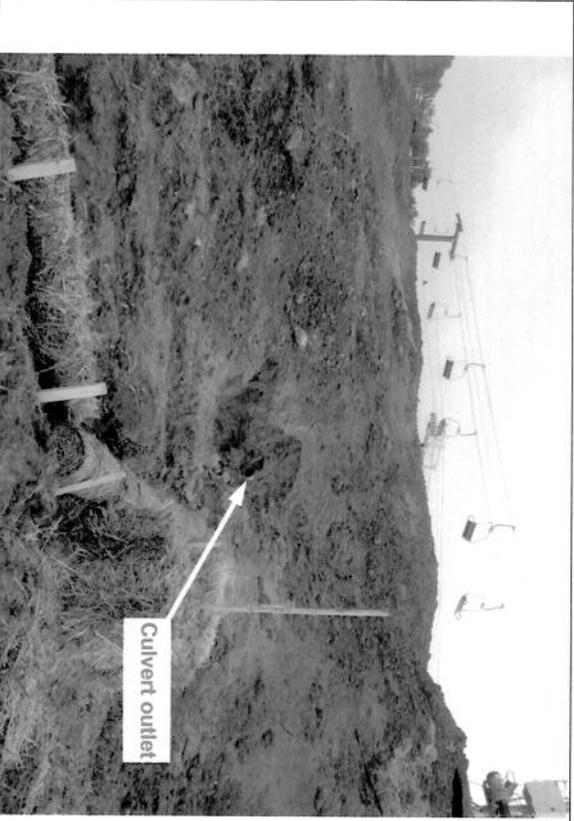
Photograph date: June 4, 2008



Photograph 5—SE edge of site. Looking NE at upgradient disturbance.



Photograph 6—E edge of site. Looking NE at upgradient disturbance.



Photograph 7—NE portion of site. Looking S at upgradient disturbance.



Photograph 8—NW corner of site. Looking NE up waterbar from diversion ditch.

Site Photographs

Base Area Regrading Project
2305 Mt. Werner Circle
Rout County, Colorado

Photograph date: June 4, 2008



Photograph 9—SW corner of site. Looking NE along waterbar.



Photograph 10—S portion of site, approximately midsite. Looking N up water bar.



Photograph 11—Eastern portion of site. Looking south up waterbar.



Photograph 12—NW corner of site. Looking SW down diversion ditch.

Site Photographs

Base Area Regrading Project
2305 Mt. Werner Circle
Routt County, Colorado

Photograph date: June 4, 2008



Photograph 13—NW corner of site. Looking SE down diversion ditch.



Photograph 14—SW portion of site. Looking E up diversion ditch.



Photograph 15—NW corner of site. Looking NE up diversion ditch.



Photograph 16—Close up of photograph 15.

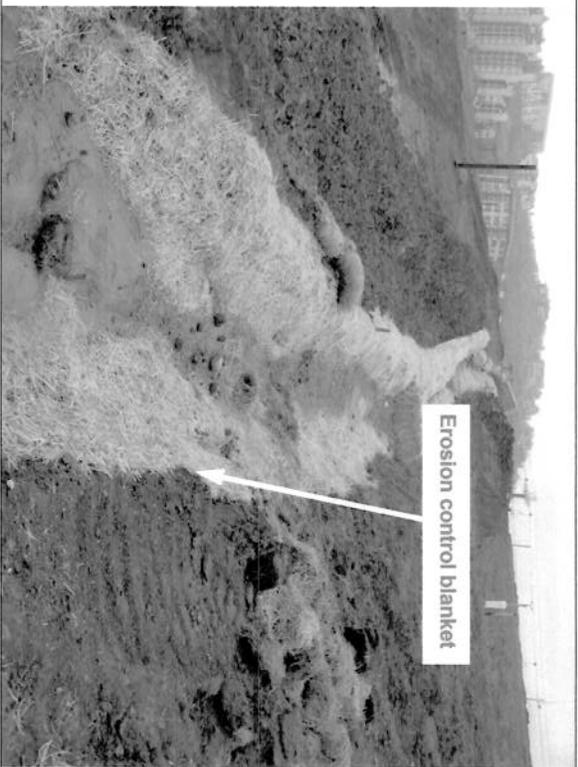
Site Photographs

Base Area Regrading Project
2305 Mt. Werner Circle
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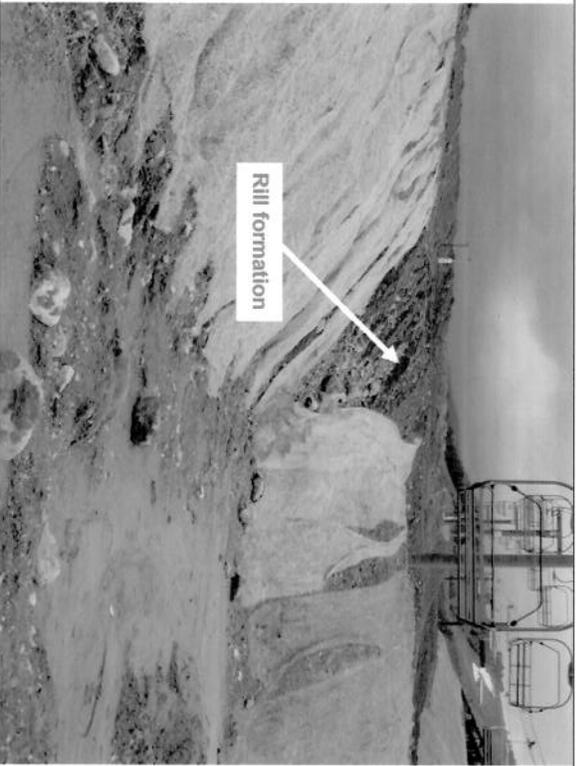
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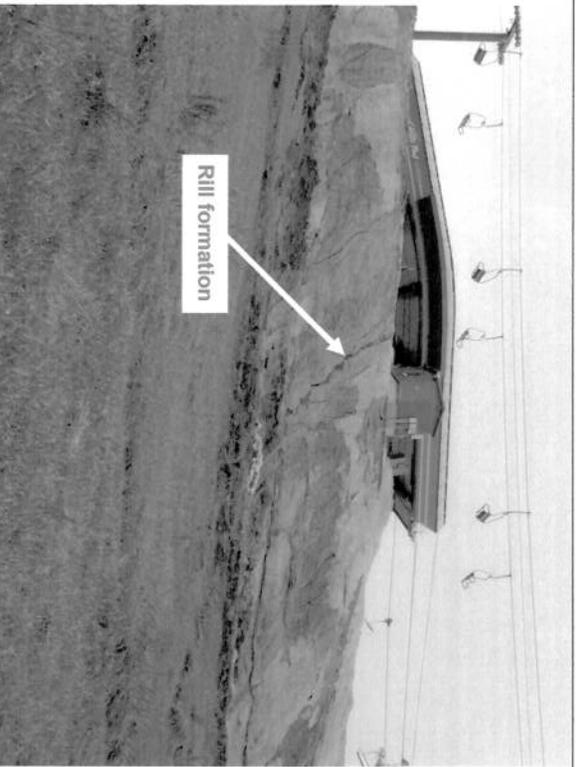
Photograph 17—NW corner of site. Looking SE at diversion ditch.



Photograph 18—SW edge of site. Looking N up water bar.



Photograph 19—NW corner of site. Looking E at base of Christy Peak Express Lift.



Photograph 20—NE edge of site looking S at blankets on slope.

Site Photographs

Base Area Regrading Project
2305 Mt. Werner Circle
Routt County, Colorado

Photograph date: June 4, 2008



Photograph 21—NW corner of site, base of Christy Peak Express Lift.



Photograph 22—Close-up of riser pipe in photograph 21.



Photograph 23—E edge of site (top) – looking WNW at culvert inlet.



Photograph 24—SW corner of site. Looking E up diversion ditch.