

Steele Park Resort: Proposed Environmental Management Program (EMP) by Peter Kilkus

Introduction

Steele Park Resort has long been an advocate of environmental responsibility at Lake Berryessa. From its original architectural approach to designing its facilities to better integrate into its natural environment to its oil recovery and bilge pad exchange program, Steele Park Resort has been a committed leader in environmental sustainability. To underscore this commitment, Steele Park Resort has formally organized its operations to meet the requirements of the internationally-recognized standard for Environmental Management Systems - ISO 14001. Steele Park Resort, through its ISO 14001 Environmental Management System (EMS), is committed to reducing the environmental impact of its activities upon the land and water resources of Lake Berryessa under its stewardship.

Steele Park Resort's Environmental Management Plan consists of ten integrated elements:

1. ISO 14001 Environmental Management System (Policy)
2. Environmental Stewardship (Philosophy)
3. Quality Recreation Experience (Outcome)
4. Stakeholder Partnerships (Resources)
5. California Clean Marinas (Program)
6. Conservation and Efficiency: Land, Energy, Water (Program)
7. Pollution Prevention & Hazardous Material Reduction (Program)
8. Solid Waste Reduction and Recycling (Steele Park 4R Environment) (Program)
9. Environmental Education Integration (Program)
10. Communication and Training (Program)

Each of these elements is intimately interconnected to provide a unified approach to managing Steele Park Resort now and in the future. Each element is discussed in detail below. For ease of reference to the requirements of the Lake Berryessa Concession Prospectus, Principal Factor 1, there is a matrix at the end of the EMP giving the specific Prospectus requirement fulfilled by each element of the EMP. In addition, after the matrix, as a cross-reference, each paragraph of Principal Factor 1 is listed along with a written comment as to where in the EMP that criterion is met. Steele Park Resort also believes that its ISO 14001 EMS and this EMP meet the Prospectus' Draft Contract Requirements, Section 3, Paragraphs A through L.

Element 1: ISO 14001 Environmental Management System (Policy)

Steele Park Resort has implemented an Environmental Management System (EMS) that meets the requirements of ISO 14001, the recognized international standard for environmental management systems. Steele Park Resort commits to becoming formally registered to ISO 14001 within one year after signing a new concession contract. Steele Park Resort has reviewed in detail the Bureau of Reclamation Concession Management Guidelines "Chapter 12 - Environmental Protection & Pollution Prevention" and believes it is in compliance with the requirements and guidelines therein. This is in large part due to the Resort's present compliance with ISO 14001 which has sections that mirror many of the sections in Reclamation's document. However, the Resort has historically met those guidelines as part of its professional resort management strategy.

Environmental Policy

Steele Park Resort's Environmental Policy is to be a responsible corporate citizen in protecting the

environment in which we operate. Our core purpose is to create innovative and enriching recreational experiences for the general public in a sustainable environment.

We are committed to reducing the environmental impact of our activities upon the land and water resources of Lake Berryessa under our stewardship.

Our business decisions balance economic viability with ecological responsibility by making a corporate commitment to continual improvement of our Environmental Management System and to the prevention of pollution. We reduce and recycle waste, conserve energy and water, educate our guests and employees on environmental stewardship, and promote the environmental education programs of local government agencies and environmental groups.

We also commit to comply with applicable legal requirements and with other requirements appropriate to the environmental aspects of our operations. Our corporate goal is to meet or exceed those requirements where practicable using a formal process of continual improvement.

Our Environmental Policy provides the framework for setting and reviewing environmental objectives and targets which are developed through a documented analysis of our environmental aspects and impacts. Environmental objectives, targets, and supporting programs will be managed as the primary method for implementing the continual improvement of our EMS and will incorporate the input of our various stakeholders.

Our EMS is documented, implemented and maintained through policies and procedures defined in our corporate EMS Manual. This EMS Manual and its contents will be communicated to all persons working for or on behalf of Steele Park Resort, and will be available to the public.

Senior management is committed to promoting and reviewing the Steele Park Resort Environmental Management System on a regular basis through program and process audit results reporting, with a formal Senior Management Review on an annual basis.

This Environmental Policy is supported by an ISO 14001-compliant Environmental Management System (EMS) consisting of the following major procedures, copies of which are attached to this proposal:

- SP-001 EMS Manual
- SP-002 Environmental Policy
- SP-003 Control of Documents and Records
- SP-004 Legal and Other Requirements
- SP-005 Environmental Aspects, Objectives and Targets, and Management Programs
- SP-006 Environmental Training and Awareness
- SP-007 Emergency Preparedness and Response
- SP-008 Monitoring and Measurement
- SP-009 EMS and Regulatory Compliance Audits
- SP-010 Communication, Internal and External
- SP-011 Control of Contractors and Suppliers
- SP-012 Non-Conformance and Corrective and Preventive Action
- SP-013 EMS Management Review
- SP-014 Marina Management - Clean Marina Program.

Roles and Responsibilities

Environmental management system roles and responsibilities are defined for functions within the organization. Senior Management provides the resources essential to the implementation and control of the environmental

management system, including: training, human resources, specialty services, financial resources, technical and informational services. The Environmental Manager has primary responsibility for establishing, operating and maintaining the EMS. The Environmental Manager Designee assumes the responsibility for tasks as defined by the Environmental Manager and is specifically responsible for the Document Control System and records management. The Environmental Management Team provides routine EMS support and reports directly to Senior Management.

The Environmental Management Team consists of Lisa Hanson (General Manager), David Hanson (Marina Manager), John Finnegan (Maintenance). The Environmental Manager is Lisa Hanson. The Environmental Manager Designee is David Hanson.

Goals and Targets

The Steele Park Resort Environmental Management Team (EMT), using Procedure SP-005, Environmental Aspects, Objectives, Targets, and Programs, manages the process of identification of the environmental aspects of the Resort and determines which of those aspects are considered significant. The Environmental Management Team has developed objectives and targets for each significant environmental aspect. These objectives and targets define:

- the performance objectives for each significant environmental aspect;
- the specific, quantified targets which define those performance objectives; and
- the planned resources and deadlines for the achievement of those targets.

Objectives and targets are developed considering significant environmental aspects, technological options and financial, operational and business plans, and the views of interested parties. The initial Objectives and Programs were deemed the most important to be accomplished initially. They will be reviewed again upon contract award for potential modification and reviewed at least annually thereafter. An example of one of the objectives and its implementation timetable is given below:

1. Objective: Create an Environmentally Preferable Purchasing Program by December 1, 2007.

Program:

- Approve the Environmentally Preferable Purchasing Policy (EPPP) by October 1, 2007
- Provide the policy to all staff members who purchase products and services.
- Review list of products purchased and cost from purchasing records.
- Create a matrix of products purchased vs. quantities and cost. This will be used for future reporting to the Bureau of Reclamation under the new contract and for Steele Park Resort's application for the 2009 California Waste Reduction Awards Program (WRAP) (Due June 2008). It will also be used to make purchasing decisions for the elimination of toxic products.
- Research an alternative product for each product on the list and the cost of the alternative with Resort suppliers. There are several sources for information regarding alternative products such as Ecoproducts (www.ecoproducts.com) and Seventh Generation (www.seventhgeneration.com). Excellent Packaging & Supply (www.excellentpackaging.com) is a wholesale distribution company, co-owned by Napa Valley residents, providing nature based packaging for foodservice and other applications. They specialize in environmentally sustainable packaging, offering compostable, biodegradable and recyclable product lines as well as traditional packaging. One example is BagasseWare - paper plates, cups, trays, bowls, and boxes made from plant fibers, either grown or recovered as crop residue. Products are microwavable, ovenable and freezable, biodegradable,

compostable and sustainable. There are numerous environmental education possibilities inherent in the use of such products.

- Make purchasing decision and document reasoning for the decision on the purchasing matrix. Decision may be that the product was less than or equal to 10% higher cost than standard product or that the cost was higher than policy's 10% premium but that the product was useful in the Resort's environmental education program (Spudware - high-heat tolerant, biodegradable, attractive cutlery made from potato starch) or marketing strategy.

Steele Park Resort will continue to evaluate its long-term environmental goals on at least an annual basis. For example, it will consider participation in the EPA National Environmental Performance Track program. To promote participation by small facilities in Performance Track, the EPA has changed the small facility designation to include any facility with fewer than fifty full-time employees. The requirement for small facilities is to a) demonstrate past achievements in one environmental aspect from any category and b) commit to two future environmental performance improvements.

Element 2: Environmental Stewardship (Philosophy)

Environmental Stewardship is probably best described through the definition of Sustainability. A simple yet elegant definition, derived from Redefining Progress (www.rprogress.org) is:

Sustainability means securing a high quality of life within the means of nature. Sustainability secures people's quality of life within the means of nature in a way that is fair and equitable to all humanity, to other species, and to future generations. Sustainability recognizes the interrelatedness of the economy, society, and environment. It requires that we not consume resources faster than they can be renewed nor produce wastes faster than they can be absorbed.

Sustainability is actually a way of thinking about everything we do and making the right choices. By replacing "quality of life" with "quality recreation experience" this definition becomes even more applicable to Resort operations. Steele Park Resort is dedicated to the objectives of preserving and protecting the extended environment and the specific resources of the Lake Berryessa area. It supports the activities of local agencies and groups also dedicated to these same goals such as the Napa County Department of Environmental Management, the Blue Ridge Berryessa Natural Area Conservation Partnership (BRBNA) (Lake Berryessa is the gateway to the BRBNA), and the Lake Berryessa Watershed Partnership (LBWP) which has developed a wide array of Best Management Practices (BMPs) which Steele Park Resort will implement as appropriate to resort operations.

Steele Park Resort management has long recognized that there is more to operating a recreational facility in an environmentally-sensitive area such as Lake Berryessa than a simple cost/benefit approach entails. For example, although the initial cost of environmentally-friendly (starch-based, biodegradable) food service supplies may be higher than the normal plastic products, that cost may be leveraged to create a compensating benefit in marketing to and environmental education of our guests.

The Resort is dedicated to a "continuous improvement" management strategy. Whether it be programs for energy conservation that both reduce dependence on fossil fuels and eliminate CO2 emissions or the use of biodegradable restaurant products, Steele Park Resort is committed to incorporating a "Think Globally, Act Locally" approach to its operations. This will extend to interpretive and educational programs for its employees and guests. Interesting, easy-to-implement programs can have significant leverage for good when applied consistently to the large numbers of families and individuals who come to the resort. We don't want to miss any opportunity to integrate these concepts into resort operations to achieve the basic goal. Also, money saved on energy efficiencies and recycling will be used for further training of Resort staff, i.e., on environmental issues and customer service. Napa Valley College offers this type of course and also offers on-site training.

To implement sustainable design and construction practices. Steele Park Resort has adopted the Leadership in Energy and Environmental Design (LEED) Green Building guidelines (www.usgbc.org/LEED/) for all future construction and remodeling. The LEED Green Building Rating System™ is the nationally accepted benchmark

for the design, construction, and operation of high performance green buildings. LEED gives building owners and operators the tools they need to have an immediate and measurable impact on their buildings' performance. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality.

One policy that is fundamental to Steele Park Resort's environmental stewardship philosophy is our Environmentally-Preferable Purchasing Policy (EPPP). Probably no other single policy can have as significant an impact on environmental goals and sustainability since it affects all aspects of Resort operations.

Steele Park Resort Environmentally Preferable Purchasing Policy (EPPP)

This policy will form the integrating principle for implementing the other elements of the Environmental Management System (EMS). Steele Park Resort gives preference to environmentally preferable products whose quality, function, and cost are equal or superior to more traditional products. When feasible and when the price of environmentally-preferable products does not exceed the price of standard products by more than 10%, the Resort shall purchase environmentally-preferable products.

This policy will:

- conserve natural resources
- minimize pollution
- reduce the use of water and energy
- eliminate or reduce environmental health hazards to workers and our community
- reduce materials that are land-filled
- increase the use and availability of environmentally preferable products
- educate ourselves, our vendors, and our end users

An environmentally-preferable product is a product that has a lesser or reduced negative effect on human health and the environment when compared to competing products that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, and disposal of the product. This term includes recyclable/compostable products, recycled products, and reusable products.

1. Source Reduction

Reducing unnecessary waste at the source allows the Resort to both mitigate the inefficient use of our natural resources and benefit economically from decreased handling and disposal costs. Procurement activity may include:

- Institute practices that reduce waste, resulting in the purchase of fewer products whenever practicable and cost-effective, but without reducing safety or workplace quality.
- Purchase remanufactured products such as laser toner cartridges, tires, furniture, equipment and automotive parts whenever practicable, but without reducing safety, quality or effectiveness.
- Consider short-term and long-term costs in comparing product alternatives. Include evaluation of total costs expected during the time a product is owned, including, but not limited to, acquisition, extended warranties, operation, supplies, maintenance, disposal costs and expected lifetime compared to other alternatives.
- Purchase products that are durable, long lasting, reusable or refillable.
- Reuse pallets and packaging materials.

2. Recycled Content Products

The Resort uses a single-stream (commingled) recycling system and recognizes that recycled content products are essential to the continuing viability of that recycling system, and for the foundation of an

environmentally sound production system. Procurement activity may include:

- products with recycled content such as printing paper, office paper, janitorial paper, construction, landscaping, transportation, vehicles, and non-paper office products – and which contain the highest post-consumer content practicable.
- Re-refined lubricating and industrial oil for use in vehicles and other equipment, as long as the product is certified by the American Petroleum Institute (API) as appropriate for use in such equipment.
- Asphalt, concrete, aggregate base or portland cement concrete for road construction projects that contains recycled, reusable or reground materials.
- Recycled content transportation products including signs, cones, parking stops, delineators, and barricades.

3. Energy and Water Savings

Recognizing that the generation of electricity is a major contributor to air pollution and that clean water is a finite resource, the Resort values products that minimize the use of these valuable resources. Procurement activity may include:

- Energy-efficient equipment with the most up-to-date energy efficiency functions, including, but not limited to, high-efficiency heating and cooling systems.
- Efficient lighting with energy-efficient equipment.
- Water-saving products.

4. Landscaping

Supporting low maintenance and environmentally sensitive landscapes minimizes the unnecessary use of fertilizers and water resources, therefore reducing the Resort's impact on the natural environment. Procurement activity may include:

- Employ sustainable landscape management techniques for design, construction and maintenance. These techniques include, but are not limited to, integrated pest management, grasscycling, drip irrigation, composting, and procurement and use of mulch and compost that give preference to those produced from regionally generated plant debris and/or food waste programs.
- Minimize waste by selecting plants that are appropriate to the microclimate, species that can grow to their natural size in the space allotted them. Place preference on native and drought-tolerant plants that require no or minimal watering once established.
- Limit amount of impervious surfaces by procuring permeable substitutes such as permeable asphalt or pavers for walkways, patios and driveways.

5. Toxics and Pollution

The use of toxics and the generation of pollution should be minimized to reduce risks to health, safety, and the environment. Procurement activity may include:

- Refrain from procuring cleaning or disinfecting products (i.e. for janitorial or automotive use) containing carcinogens, mutagens. Chemicals to be avoided are listed by the U.S. EPA or the National Institute for Occupational Safety and Health on the Toxics Release Inventory.
- Phase out chlorofluorocarbon-containing refrigerants, solvents and similar products.
- Procure readily biodegradable surfactants and detergents that do not contain phosphates.
- Maintain buildings and landscapes, manage pest problems through the application of prevention techniques and physical, mechanical and biological controls
- Procure products with the lowest amount of volatile organic compounds (VOCs), highest recycled content, and low or no formaldehyde in materials such as paint, carpeting, adhesives, etc.
- Procure products and equipment with no lead or mercury. For products containing lead or mercury, give preference to those with lower quantities of these metals.
- Consider vehicle procurement alternatives to diesel such as compressed natural gas, biobased fuels, hybrids, electric batteries, and fuel cells, as available.

However, all actions taken by the Resort must be practical within the Resort's business model and have a measurable result. One example of this is the Resort's program to analyze all of its operations with regard to the implementation of photovoltaic (solar cell) power generation. Although Resort management would like to install this technical innovation, and it would be useful within the environmental education programs it plans for its customers, the cost is still an obstacle. Other energy efficiency projects in process will yield a better result in the near term while the future use of photovoltaics will remain under regular review.

As part of Steele Park Resort's ISO 14001 program, an Environmental Management Team was formed in the summer of 2007 and Lisa Hanson, Resort Manager, was appointed Environmental Manager. Training will be provided to these personnel as part of the ISO 14001 program including seminars in environmental management and the California Clean Marinas Program. In addition, the Resort will use the services of Peter Kilkus of Berryessa Environmental Management Systems who has extensive experience in the environmental, solid waste, and recycling management field. His resume is attached and examples of previous projects are available at www.BerryessaEnvironmental.com.

Element 3: Quality Recreation Experience (Outcome)

A Quality Recreation Experience is the practical outcome of an integrated approach to satisfying our guest's recreational expectations. Quality of the Steele Park recreation experience is defined as the sum total of the attributes of our products and services which guarantees their value to our guests - the recreating public, individuals and families. We will deliver recreational products and services that consistently meet or exceed our guests' expectations. Every Steele Park Resort employee shares in this commitment to guest satisfaction. Our performance standard for every Resort activity is: Do it right the first time.

The need to attract more visitors to Lake Berryessa requires an expansion of the target market of recreationists. One potential market is nature-based recreation or eco-tourism which may include non-motorized land and water activities. Although the primary market will always be people interested in motorized water-based activities, there is room for expansion of both markets. The Steele Park Resort Environmental Management Program explicitly recognizes this through its emphasis on thematic marketing, architectural standards, and environmental education. A pleasant, environmentally-sustainable yet fun, memorable adventure experience for our guests is our primary goal. We wish to do this through their "immersion" in our local natural environment in every sense of that term.

For example, the adjacent cove which now includes Willi's Ski School will no longer be part of the Steele Park Resort concession. It will be designated as a non-motorized recreation area. The Resort will take advantage of this opportunity by setting up a kayak launch ramp, renting kayaks and canoes, and linking this experience into marketing and environmental education programs. The Land Trust of Napa County owns land adjacent to Steele Park and Capell Cove which can be accessed by kayak in a combined kayak/hike outing. Steele Park Resort itself also has several short but pleasant hiking trails.

Reduction of noise and protection of natural quiet is a problem at any public gathering place, especially in campgrounds and RV sites. Layout and vegetation sound barriers will be used to minimize this potential problem. The resort also has rules governing this type of noise to make sure all guests have a quality recreational experience. The Resort is also analyzing its operations to make sure that there is no excessive noise generated by its own equipment such as pump and maintenance equipment.

Steele Park Resort has adopted the Leadership in Energy and Environmental Design (LEED) Green Building guidelines for all future construction and remodeling. One element of these standards is Light Pollution Reduction. Measurements will be made throughout the resort to determine the type of lights and intensity of lighting that will best support a pleasant ambiance yet provide physical safety.

Steele Park Resort intends to use primarily native vegetation for landscaping since native plants evolved to live with the local climate, soil types, and animals. The California Native Plant Society can provide expert assistance in this project. This project brings several advantages. One is the use of the project in the environmental education of our guests. Another is that many native plants need minimal irrigation beyond normal rainfall. Low

maintenance landscaping methods are a natural fit with native plants that are already adapted to the local environment. This allows the Resort to use less water, little to no fertilizer, little to no pesticides, less pruning, and less maintenance time. Research shows that native wildlife prefers native plants. Planting Steele Park Resort property with California natives can also provide a “bridge” for insect, bird, and animal species to nearby Blue Ridge Berryessa Natural Area land.

Guest safety and security is an important practical issue. Emergency planning, training, and response is covered in detail in Procedure SP-006 Environmental Training & Awareness, SP-007 Emergency Preparedness and Response, and associated procedures listed in that section of the EMS.

Element 4: Stakeholder Partnerships (Resources)

Steele Park Resort proposes to enhance its expertise through the use of the extensive environmental resources network available within the local area. Partnerships will be a valuable means of expanding the environmental capabilities of Steele Park Resort’s staff. Besides the primary partner, the Bureau of Reclamation, there are several other important local resources such as the Napa County Department of Environmental Management, Napa County Resource Conservation District, the Blue Ridge Berryessa Natural Area Conservation Partnership (BRBNA) (Lake Berryessa is the gateway to the BRBNA), the Lake Berryessa Watershed Partnership (LBWP) and others.

Steele Park Resort intends to be a strong partner with the Bureau of Reclamation in implementing the various programs in support of the new concession contract. Steele Park Resort’s Environmental Management Plan will be submitted to Reclamation annually for revision and approval. Steele Park Resort’s NEPA compliance responsibilities during the development of new facilities will be met through a combination of detailed review of the legal requirements, use of expert consultants, and a close working relationship with the local Reclamation Area Manager. Since Reclamation is the governing “Lead Federal Agency” under NEPA definitions, Resort management will fully respect and respond to its directions.

The Resort will keep a direct and timely communication channel open to Reclamation and submit to the Area Manager any documentation required per the concession contract including, but not limited to, copies of all documents, reports, monitoring data, manifests, and other documentation required under applicable laws to be submitted to regulatory agencies including immediate written notice of any discharge, release, or threatened release of any hazardous or toxic substance. The Resort will also submit to the area manager any environmental plans for which coordination with area operations are necessary and appropriate, as determined by the Area Manager in accordance with applicable laws.

The Resort will coordinate pesticide use with Reclamation’s Area Manager and the area’s IPM coordinator, if available. This IPM coordinator will assist with identification of pests, recommend and approve pest-monitoring methods, obtain approvals for the use of pesticides, and provide other technical assistance. The Resort’s internal IPM coordinator will meet annually with the area concession management specialist and IPM coordinator to discuss pest management issues and to project the requirements.

The Resort is fortunate to be in close proximity to the University of California at Davis which has developed a statewide IPM program (www.ipm.ucdavis.edu/index.html). The Environmental Manager will use this extensive resource in expanding the Resort’s IPM program.

The Napa County Department of Environmental Management (www.co.napa.ca.us/Gov/Departments) is the local expert in such areas as solid waste and recycling, hazardous materials management, and stormwater runoff control. The Resort will make use of the County’s various guides and checklists in support of its ISO 14001 Environmental Management System.

The Napa County Resource Conservation District (www.naparc.org) is a local non-regulatory agency whose mission is to promote responsible watershed management through voluntary community stewardship and

technical assistance. The District is a technical information source for landowners, managers and residents. It has information on soils, watershed, and resource conservation methods.

The Napa Valley College (www.napavalley.edu) Community Education program offers a wide variety of not-for-credit classes and workshops, educational trips and tours, short-term occupational, and professional continuing education programs. Steele Park Resort will avail itself of those programs to assist in training its staff.

Berryessa Garbage Services is the solid waste and recycling services provider to Steele Park Resort. A close working relationship between the two companies will support the expansion recycling and the reduction of solid waste.

Another local partner will be the Blue Ridge Berryessa Natural Area Conservation Partnership (BRBNA) (www.BRBNA.org). This organization provides a wealth of shared environmental stewardship resources. The Blue Ridge Berryessa Natural Area Conservation Partnership (BRBNACP) promotes the conservation and enhancement of the expansive landscape that comprises the BRBNA by encouraging the sensitive management of its natural, agricultural, recreational, archeological and historical resources. As a voluntary and inclusive organization, the BRBNACP facilitates coordination and collaboration among its public, private, and nonprofit partners; provides research, information, and education services to partners; and conducts outreach to the public.

The Land Trust of Napa County (<http://napalandtrust.org>) has several properties around the County. The closest to Steele Park is Berryessa Vista - 224 acres of oak forests, chaparral and grasslands on the shore of Lake Berryessa adjacent to Steele Park across from the Capell Valley launch ramp.

The Lake Berryessa Watershed Partnership (www.lake-berryessa.com) has been monitoring Lake Berryessa water quality for many years and has developed excellent Best Management Practices (BMPs) and supported the Napa County Bilge Pad Recovery Program featuring Bilgee the walking bilge pad. The Resort will evaluate the BMPs for use as appropriate and has and will continue to support the Bilgee program in the future. Steele Park Resort already has an oil recycling station which is managed by Napa County.

In terms of commercial partners, Excellent Packaging & Supply (www.excellentpackaging.com) is a wholesale distribution company, co-owned by Napa Valley residents, providing nature based packaging for foodservice and other applications. They specialize in environmentally sustainable packaging, offering compostable, biodegradable and recyclable product lines as well as traditional packaging. One example is BagasseWare - paper plates, cups, trays, bowls, and boxes made from plant fibers, either grown or recovered as crop residue. Products are microwavable, ovenable and freezable, biodegradable, compostable and sustainable. There are numerous environmental education possibilities inherent in the use of such products.

Marina Recreation Association (www.marina.org) which provides significant educational programs for the marina owner and training opportunities for their management staff.

Element 5: California Clean Marinas (Program)

This is one of the most important programs which will be implemented by Steele Park Resort. It is essentially a mini-ISO 14001 for marinas.

The Resort has incorporated the Best Management Practices (BMPs) of the California Clean Marinas Program in Procedure SP-014 Marina Management Program. A formal objective has been written to implement the BMPs over time: Implement at least 50% of the California Clean Marinas Program BMPs by December 1, 2007, and 75% of the BMPs by May 1, 2008.

The Resort will become a member of the Marina Recreation Association (www.marina.org) which provides significant educational programs for the marina owner and training opportunities for their management staff. Annually the MRA Educational Conference is held in various locations making training and networking convenient and affordable for everyone. One major initiative of the MRA is to assist marinas in becoming

certified to the California Clean Marinas Program. The Resort intends to seek certification to the Clean Marinas Program within one year of the signing of a new contract.

Element 6: Conservation and Efficiency: Land, Energy, Water (Program)

Steele Park Resort consciously evaluates its impact on the land under its stewardship. Whether it be stormwater and erosion control or landscaping methodology, the Resort will apply best management practices. The Resort has a lake shore clean-up within Resort boundaries every spring with debris removal.

Water and energy conservation are important items within the Steele Park Resort's EMS. Per Procedure SP-005 Environmental Aspects, Impacts, Objectives, Targets, and Programs all environmental aspects and impacts of Resort operations were reviewed and objectives set. The Environmental Management Team reviewed the Resort's environmental aspects and impacts in detail and developed an Environmental Aspects and Impacts versus Operation Significance Matrix. This process allowed the EMT to understand the present state of environmental issues at the resort and prioritize environmental objectives for future management programs to accomplish those objectives.

For example, some of the issues listed in the Policy section of the Environmental Aspects Matrix - Energy Efficiency Guidelines, Efficient Light Bulb Purchasing Program, and Fluorescent Lamp Retrofit Guidelines - are addressed by ongoing programs. The resort has changed out approximately 500 incandescent light bulbs for compact fluorescents in all areas of the resort. The result of this change can be seen from the Environmental Defense energy savings web site calculator (www.environmentaldefense.org/page.cfm?tagID=602):

Steele Park Resort switched: 500 60-watt bulbs with 6000-hour replacements (minimum bulb life) including roadway lights. Over the life of the new bulbs, the Resort will save \$18,684 on energy bills (\$.13 per kilowatt-hour average) and eliminate 88,115 pounds of CO₂ discharged into the atmosphere.

This example is typical of the analysis and effort the Resort puts into its EMS. Other examples are the water conservation efforts such as low flow shower heads and other strategies listed in the EMS. Use of alternative fuels and electric vehicles will be a part of the Resort's efforts to switch to smaller, more efficient maintenance vehicles.

Outdoor lighting is controlled by photocell on-off switches to minimize electricity use. The resort is also in the process of analyzing the cost-benefit of replacing all single-glazed windows with energy efficient double-glazed windows. Low flow water fixture replacement program has been in place for more than 2 years. The Environmental Management Team (EMT) believes that all appropriate fixtures within the Resort have been replaced.

An example of Best Management Practices (BMPS) being considered by Steele Park Resort for managing storm water runoff comes from the Lake Berryessa Watershed Partnership. Storm water runoff is rain that flows off the land, from streets, roof tops, and lawns. Runoff can carry sediment and contaminants with it into the lake. Potential contaminant constituents in runoff include oil, gasoline, sediment, pesticides, fertilizers, nutrients, household chemicals, animal waste and litter. Uncontrolled runoff can also result in localized flooding and erosion. BMPs being evaluated are:

1. Educate staff and guests about proper use and storage of household toxic materials, responsible lawn care and responsible landscaping
2. Provide a hazardous materials collection service through Berryessa Garbage Service.
3. Control erosion using vegetation or soil covers during construction events
4. Stage construction to reduce soil exposure and time construction to coincide with periods of low rainfall and use sediment traps, basins and fences to control erosion during construction
5. Direct runoff from impervious surfaces over grassed areas

6. Design porous parking lots with voids filled with sand, gravel or grass that allow storm water to infiltrate soils
7. Construct grass swales and waterways that reduce the speed and volume of runoff
8. Create buffer strips of trees, shrubs and grasses along streams and tributaries to decrease runoff velocity, filter sediments and prevent stream bank erosion
9. Construct filter strips of close-growing vegetation along sloped land surfaces bordering surface water bodies to reduce erosion and filter out excess nutrients
10. Control other sources of erosion using mulch, riprap or vegetation

Element 7: Pollution Prevention & Hazardous Material Reduction (Program)

Per Steele Park Resort's ISO 14001 Environmental Management System as described in detail in its Environmental Management System Manual (SP-001), pollution prevention is a key ongoing goal. The Resort recognizes its unique position as a major facility on the shore of one of the cleanest lakes in California. The Resort uses water and sewer services provided by Napa County and thus has no chemicals or residue from those types of operations as at other resorts.

The Resort has already shifted to several environmentally-friendly products in its operations. The Resort will continue this process and monitor usage and cost. Steele Park Resort's Environmentally Preferable Purchasing Policy (EPPP) is key to implementing this goal and defines replacements for toxic products. With the elimination of privately-owned units (permittees) which had no real oversight for household hazardous product use at the Resort, use of these types of products will be under the total control of the resort and will be eliminated on an expedited schedule. There are several sources for information regarding alternative products such as Excellent Packaging & Supply (www.excellentpackaging.com), Ecoproducts (www.ecoproducts.com) and Seventh Generation (www.seventhgeneration.com). Steele Park Resort is working with its product suppliers to choose the best replacement products at competitive prices.

There are no underground storage tanks within Steele Park Resort. All fuel storage and delivery systems meet requirements and fall under main Procedures SP-004 Legal and Other Requirements, SP-008 Monitoring and Measurement, and their accompanying sub-procedures. The Resort will evaluate upgrading to the latest fuel delivery systems as part of its regular review of environmental aspects especially with regard to the Clean Marinas Program.

The Resort will continue to participate in the Napa County bilge pad distribution and recovery program as well as the local oil recycling program. The Resort has a used motor oil collection station, installed and serviced by Napa County which available to all customers and local residents.

Steele Park Resort has always used utmost care in its use of herbicides and pesticides. The Resort will develop a formal Integrated Pest Management Program although it does not have a major pest problem. Only minor "insect deterrent products" are used within the Resort. Steele Park Resort's IPM, developed with the assistance of the UC Davis program described previously, will be an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties.

Element 8: Solid Waste Reduction and Recycling (Steele Park 4R Environment) (Program)

The Steele Park 4 R Environment Program (Reduce, Reuse, Recycle, Restore) intends to educate our guests and staff about the benefits of waste reduction, recycling, and composting. Steele Park Resort diverts about 25% (800 cubic yards in 2006) of its more than 3,000 cubic yards of annual solid waste. Our goal is to reduce the amount of solid waste generated and increase the amount diverted. Recycling is notoriously difficult in a resort environment. Most people are on vacation and often don't want to deal with trash beyond getting rid of it, especially if they have a bag of mixed trash and recyclables when coming back to the dock after a day on the water.

REDUCE the waste that enters our resort. The Reduce element of this program focuses on waste reduction methods. Solid wastes are really just wasted solids.

REUSE, donate or exchange what's still usable. An example is to reuse demolition debris. This will be an important element in the redevelopment of the Resort.

RECYCLE is an act which should come naturally to all of us. The first step in recycling is to perform a waste audit - what are we actually throwing away? Recycling and waste reduction information will be provided as part of the Resort's environmental education efforts.

RESTORE connections to the world around us and responsibility for our actions. We have added a fourth R, Restore, to the familiar 3 R's. Restoring or repairing items to serviceable use should always be a part of our thinking. But it is just as important to restore a sense of responsibility towards our beautiful Lake Berryessa environment and to continually make it a better place.

Education (and convenience) will be critical elements of any program. Steele Park Resort's expanded recycling program has been initiated. The white recycling bins provided by Berryessa Garbage Company, which were only collecting bottles, cans and plastics, are now blue bins which will collect cardboard and paper products as well. The resort will provide additional blue recycling containers at various locations.

The Environmentally Preferable Purchasing Policy (EPPP) will tend to minimize excess solid waste. Also, the Resort has always had a good relationship with its solid waste and recycling company, Berryessa Garbage Services. The Recycling Guide provided by Napa County will be an important practical resource (www.co.napa.ca.us/GOV/Departments/40500/Forms/Recycleguidelowres2007.pdf).

In the near future, Harbor Cove Cafe and The Boathouse Restaurant will recycle their cooking oil to make biodiesel fuel. Biodiesel reduces air pollution and dependence on fossil fuels. It is non-toxic and biodegradable - it is an environmentally safe and cost-effective alternative fuel. The Resort will also consider co-sponsoring, with Berryessa Garbage Services and Napa County, hazardous material collection days for guests and local residents.

Steele Park Resort intends to apply for the California Integrated Waste Management Board's 2009 Waste Reduction Awards Program (WRAP) whose deadline is June, 2008. As part of that process data will be collected on volumes and types of products and waste generated, replaced, or avoided.

Element 9: Environmental Education Integration (Program)

Environmental Education can not be considered a stand-alone process. It must be integrated into the Resort's operations, the thematic marketing program, for example, in ways that affect the guest's consciousness without being overbearing or preachy. The intent is to give people a deeper understanding of the environment, inspiring them to take personal responsibility for its preservation and restoration. The previously-mentioned kayak/hike to Napa Land Trust property along Capell Cove is an example of how this can be accomplished.

Steele Park considers itself a family-oriented resort. There is a theory that today's youngest generations are suffering from "nature deficit disorder." Sometimes it means they are actually afraid to go outside. In other cases, it means they just have no interest in the natural world. Today's overscheduled kids are increasingly "plugged in" to electronic devices and unplugged from nature. Steele Park Resort wants to offer families time for unstructured play and interaction with the natural world to help reverse the nature-child disconnect.

The Resort will solicit interpretive programs and educational materials from regional environmental organization partners. There is an enormous amount of possible material on various web sites including that of the Environmental Protection Agency (www.epa.gov/teachers/).

Steele Park Resort's ISO 14001 EMS incorporates employee and customer education and communication of

environmental goals. Whether this is done through interpretive programs as guest activities or simple methods such as having electricity saver stickers placed in guestrooms as reminders to shut off lights when not in use, the Resort will explore and implement the best management practices for sustainable operations. Steele Park will incorporate environmental messages in its guest handouts and room information. An excellent resource is Reclamation's Concession Management Guidelines, Chapter 12 - Environmental Protection & Pollution Prevention, Section D. Sustainable Maintenance and Operations.

Element 10: Communication and Training (Program)

As discussed above in Element 4, Stakeholders Partnerships, Steele Park Resort intends to be a strong partner with the Bureau of Reclamation in support of Reclamation's Mission Statement and in implementing the various programs in support of the new concession contract. Steele Park Resort's Environmental Management Plan will be submitted to Reclamation annually for revision and approval. Steele Park Resort's NEPA compliance responsibilities during the development of new facilities will be met through a combination of detailed review of the legal requirements, use of expert consultants, and a close working relationship with the local Reclamation Area Manager. Since Reclamation is the governing "Lead Federal Agency" under NEPA definitions, Resort management will fully respect and respond to its directions.

The Resort will keep a direct and timely communication channel open to Reclamation and submit to the Area Manager any documentation required per the concession contract including, but not limited to, copies of all documents, reports, monitoring data, manifests, and other documentation required under applicable laws to be submitted to regulatory agencies including immediate written notice of any discharge, release, or threatened release of any hazardous or toxic substance. The Resort will also submit to the area manager any environmental plans for which coordination with area operations are necessary and appropriate, as determined by the Area Manager in accordance with applicable laws.

The Resort will coordinate pesticide use with Reclamation's Area Manager and the area's IPM coordinator, if available. This IPM coordinator will assist with identification of pests, recommend and approve pest-monitoring methods, obtain approvals for the use of pesticides, and provide other technical assistance. The Resort's internal IPM coordinator will meet annually with the area concession management specialist and IPM coordinator to discuss pest management issues and to project the requirements.

Communication and training clearly must be integrated into the rest of the Environmental Management Plan, especially the Environmental Education element, for it to be successful. This includes consideration of the needs of staff, guests, and local community. Procedure SP-010, Communication, Internal and External, defines the communication process within Steele Park Resort intended to make all staff members aware of the Environmental Management System and their important role in its implementation. Steele Park Resort, as documented by the release of this procedure, has also decided to communicate externally regarding its Environmental Management System and its positive impact on the local community. This procedure defines the process by which Steele Park Resort will receive, document, and respond to relevant communication from external interested parties.

Steele Park Resort identifies, plans, monitors and records training needs for personnel whose work may create a significant impact upon the environment. Steele Park Resort has an environmental procedure to train employees at each relevant function and level so they are aware of the environmental policy, significant environmental aspects, their roles and responsibilities in achieving conformance with the policy and procedures, and with the requirements of the environmental management system. The training coordinator is responsible for maintaining employee training records. Appropriate records are monitored and reviewed on a scheduled basis. Competency is determined by the employee's supervisor as specified in Procedure SP-006, Environmental Training and Awareness.

Internally, Steele Park Resort will monitor its own performance through self-audits, management reviews, and corrective and preventive action as defined in Procedures, SP-009 EMS and Regulatory Compliance Audits, SP-012 Non-Conformance and Corrective and Preventive Action, and SP-013 EMS Management Review.

