



April 18, 2023
Project No. M8014.01.079

Trevor Rowe
ZRZ Realty
3121 SW Moody Avenue
Portland, OR 97209

Re: Zidell Waterfront Property, 3121 SW Moody Avenue
Cleanup Status Summary

Dear Trevor Rowe:

On behalf of ZRZ Realty Company, Zidell Marine Corporation, and Tube Forgings of America, Inc. (collectively referred to in this document as Zidell), Maul Foster & Alongi, Inc. (MFA), has summarized the obligations and associated documents guiding environmental management of the Zidell Waterfront Property (site) located at 3121 Southwest Moody Avenue in Portland, Oregon (ECSI No. 689). The completed remedy manages contamination in soil and sediment beneath engineered caps, preventing human and ecological receptors' exposure. Because contamination remains in place, Zidell maintains its responsibility for satisfying the obligations with the State of Oregon and ensuring that the constructed remedy remains effective.

It is MFA's understanding that Zidell intends to submit a preliminary land division application to the City of Portland in order to subdivide the Zidell property into 12 lots and create necessary rights-of-way for street extensions through the property. Portland City Code (PCC) Chapter 33.635.200 requires that, where historic uses of the site indicate that a hazard may exist, the applicant must show that the proposed land division will result in lots that are suitable for development. As identified through this letter, the proposed lots should be considered developable despite existing contamination within the site, as long as future development activities are coordinated with the Oregon Department of Environmental Quality (DEQ), and necessary environmental work plans are prepared demonstrating how construction phase soil management will comply with existing management plans. The subsequent sections of this letter summarize the Zidell property's cleanup status to-date.

On April 14, 1995, Zidell entered into a voluntary agreement with the Oregon Department of Environmental Quality (DEQ) to conduct a remedial investigation and feasibility study at the site (DEQ No. WMCVC-NWR-94-23; ECSI No. 689). The remedial investigation was completed in 2003 (MFA 2003), and the feasibility study was completed in 2004 (MFA 2004). The remedial action, documented in the record of decision (ROD) (DEQ 2005), was selected by the DEQ in accordance with Oregon Revised Statutes 465.200 through 465.380 and Oregon

Administrative Rules 340-122-0090. The remedy was performed by Zidell in accordance with the General Judgment on Stipulation and Consent, Case No. 0609-09344 between the State of Oregon and Zidell, entered into on September 12, 2006, and as amended in January 2011. A Certification of Completion was issued for Case No. 0609-09344 between the State of Oregon and Zidell, and entered into on June 15, 2018, recognizing the completion of Zidell's cleanup activities consistent with the requirements of the ROD and documenting the public notice that was published in the Oregon Secretary of State's Bulletin, in the *Oregonian* newspaper, and in the Portland Harbor Cleanup bulletin.

The Zidell waterfront property remains fully capped, preventing direct contact with residual levels of contamination in soil. The protective capping remedy fully complies with the ROD and incorporates development features (building slabs, road surfacing, clean import fill) in addition to gravel and vegetated soil caps.

Development of future parcels will require coordination with DEQ and preparation of an environmental work plan to document how construction phase soil management will comply with the requirements of the ROD, which primarily requires conformance with the upland site management plan (MFA 2018a) and the inspection and maintenance plan (MFA 2018b), which were approved by DEQ. The upland site management plan summarizes residual contamination, soil management procedures for future development, groundwater and stormwater management requirements, site controls, and ongoing reporting requirements associated with the upland developable property, including the future South Waterfront Greenway area. The inspection and maintenance plan specifies the long-term inspection and maintenance requirements for the cap and other engineering controls. Additionally, to facilitate closure of the property cleanup, MFA prepared a letter report to the DEQ summarizing the cleanup activities, environmental management documents, and the ongoing obligations associated with the site (MFA 2018c). The letter is another resource to be used when developing the environmental work plan.

Please call if you have any questions relating to the information presented in this summary of the cleanup status for the Zidell Waterfront Property. MFA staff can be reached at 971.544.2139.

Trevor Rowe
April 18, 2023
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Sincerely,

Maul Foster & Alongi, Inc.

A handwritten signature in black ink, appearing to read 'Erik Bakkom'.

Erik Bakkom, PE
Principal Engineer

A handwritten signature in black ink, appearing to read 'Jacob Faust'.

Jacob Faust, PE
Senior Engineer

Attachments: Limitations
References
Developer Summary

LIMITATIONS

The services undertaken in completing this letter report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Information contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

REFERENCES

DEQ. 2005. *Remedial Action Record of Decision, Zidell Waterfront Property, ECSI No. 689*. Oregon Department of Environmental Quality, Northwest Region—Voluntary Cleanup Program: Portland, OR. June.

MFA. 2003. *Remedial Investigation and Risk Assessment, Zidell Waterfront Property, 3121 SW Moody Avenue, Portland, Oregon*. Prepared for ZRZ Realty Company. Maul Foster & Alongi, Inc.: Portland, OR. July 11.

MFA. 2004. *Feasibility Study Report, Zidell Waterfront Property, 3121 SW Moody Avenue, Portland, Oregon. ECSI #689*. Prepared for ZRZ Realty Company. Maul Foster & Alongi, Inc.: Portland, OR. December 2.

MFA. 2018a. *Upland Site Management Plan, Zidell Waterfront Property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689*. Prepared for ZRZ Realty Company. Maul Foster & Alongi, Inc.: Portland, OR. February 27.

MFA. 2018b. *Upland Cap Inspection & Maintenance Plan, Zidell Waterfront Property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689*. Prepared for ZRZ Realty Company. Maul Foster & Alongi, Inc.: Portland, OR. February 27.

MFA. 2018c. Erik Bakkom, PE, Maul Foster & Alongi, Inc. *Environmental Management Documents, Zidell Waterfront Property (ECSI No. 689)*, Letter to Madi Novak, Oregon Department of Environmental Quality. April 24.

DEVELOPER SUMMARY





DEVELOPER SUMMARY ZIDELL WATERFRONT PROPERTY INTERIM SITE MANAGEMENT PLAN



PIONEERING CHANGE WITH INNOVATIVE SOLUTIONS



MEMORANDUM

To: Dennis Allen, Zidell Yards Date: May 13, 2013
From: Erik Bakkom, PE Project: 8014.01.32

RE: Developer Summary of Zidell Waterfront Property Interim Site Management Plan

The Zidell waterfront property (the site) encompasses 29.67 acres on the west side of the Willamette River in the South Waterfront District of Portland. Zidell Marine Corporation currently builds, sells, and leases steel barges in the site's operational area, south of the Ross Island Bridge, which includes an office building and barge-building facilities. Barges are launched into the Willamette River approximately once each year from the slipway (the sloped ramp in the southeast part of the operational area).

Historically, the entire site was used for industrial activities related to ships (building, dismantling, converting, repairing, salvaging), as well as scrap metal operations, wire burning, aluminum smelting, and modular housing construction. The historical industrial activities resulted in chemical and asbestos impacts to soil and Willamette River sediment at the site.

In 1995, Zidell began the process of investigating the magnitude and extent of the impacts to the soil and sediment on site. As part of the remedial investigation, contaminants of concern (COCs) were identified for determining required cleanup actions. The following COCs identified at the site:

- Polychlorinated biphenyls
- Polycyclic aromatic hydrocarbons
- Metals (including lead, mercury, arsenic, cadmium)
- Butyltins
- Asbestos (in soil and in bulk)

In the ensuing years, the design for the remediation was developed. The cleanup objectives were selected by the Oregon Department of Environmental Quality in 2005 and formalized in a Record of Decision (ROD); design and permitting for the remedial action were then initiated. The following remedial actions have been completed at the site to date:

- Upland Hot Spot Removal—In 2010, Zidell completed removal of contaminated soils in the upland portions of the site (landward of the top of riverbank). Soils were excavated

at various depths (to a maximum depth of 5 feet) within defined boundaries (“hot spots”) where contaminant concentrations exceeded levels that pose a risk to the environment (ecological) or human health. Before excavations were backfilled with clean material, a layer of orange demarcation fabric was placed as a visible delineation boundary between clean fill and underlying impacted soil.

- **Bank and Sediment Remediation**—In 2011, Zidell completed remediation of the riverbank and in-water sediment, consisting of excavation and capping of human health and ecological hot spots on the riverbank, excavation and fill of portions of the riverbank for slope stability, and capping of contaminated in-water sediments adjacent to the bank. Demarcation fabric was installed over the existing bank soil before placement of fill on the bank slopes. No demarcation fabric was placed over the in-water sediment.
- **Greenway Soil Cap**—In 2012, Zidell completed construction of a clean soil cap in the potential greenway area (a 100-foot setback from the 2002 top of riverbank line), stretching from the northern property boundary to the south property line. The greenway cap area covers 4.1 acres and is a minimum of 2 feet thick. A portion of the greenway cap (0.8 acre) underneath and just north of the (currently under construction) TriMet Portland-Milwaukie Light Rail Bridge remains uncapped and will be capped following the completion of the bridge construction.
- **Upland Interim Cap**—In 2012 and early 2013, Zidell completed construction of an interim clean gravel cap over the upland portion of the site, west of the greenway soil cap, beginning in the Ross Island Bridge right-of-way and extending north to the TriMet bridge approach. Clean gravel was imported to the site and installed to a depth of 12 inches. The required final clean cap thickness is a minimum of 24 inches; therefore, the current cap is considered interim and will require installation of additional thickness by 2016 (consistent with the ROD) unless the site is developed by that date.

As mentioned previously, human health and ecological hot spot soils have been excavated; however, soil with chemical and asbestos impacts remains. The Interim Site Management Plan (ISMP) (MFA, 2013), a component of the remedial action, is intended to provide guidelines for assessing the potential environmental impacts and exposure potential associated with disturbing these impacted soils during future construction at the site. The ISMP identifies site COCs; excavation protocols; soil-handling procedures; waste characterization and disposal requirements; erosion-control, dust-control, and stormwater protection measures; and groundwater management. The ISMP Developer Summary is intended for use as a quick reference guide to the ISMP. The summary should be used as a companion document and should in no way substitute for the user’s reading and understanding the requirements of the complete ISMP document.

The guidelines and procedures outlined in the ISMP and ISMP Developer Summary are to be implemented during site management required as part of future site redevelopment or any

subsequent projects in the site area where impacted site soil (all soil beneath demarcation layer) is disturbed or groundwater is generated.

As a result of recent reconstruction and horizontal alignment shift of Moody Avenue by the City of Portland, Zidell acquired a portion of the Moody Avenue right-of-way. Zidell also recently acquired an adjacent property, located at 3030 SW Moody Avenue. The protocols outlined in the ISMP do not apply to the property formerly within the Moody Avenue right-of-way, to the 3030 SW Moody Avenue property, or to Zidell-owned properties located west of Moody Avenue.

Further information about the completed cleanup actions and the current site conditions can be found by requesting the following documents:

- Final Upland Remedial Design Report (MFA, 2010)
- Upland Remedial Action Completion Report (MFA, 2011)
- Bank and Sediment Remedial Action Design Report (MFA, 2012a)
- Construction Completion Report (bank and sediment) (MFA, 2012b)
- Greenway Cap Construction Completion Report (MFA, forthcoming)
- Upland Cap Construction Interim Completion Report (MFA, forthcoming)

Attachments: Limitations
References
Tables
Figure

LIMITATIONS

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Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

REFERENCES

- MFA. 2010. Final upland remedial design report, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon. July 19.
- MFA. 2011. Upland remedial action completion report, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon. April 7.
- MFA. 2012a. Bank and sediment remedial action design report, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon. February 22.
- MFA. 2012b. Construction completion report, Zidell bank and sediment remediation project, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon. April 26.
- MFA. 2013. Interim site management plan, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon. May 2.
- MFA. Forthcoming. Greenway cap construction completion report, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon.
- MFA. Forthcoming. Upland cap construction interim completion report, Zidell waterfront property, 3121 SW Moody Avenue, Portland, Oregon, ECSI No. 689. Maul Foster & Alongi, Inc., Portland, Oregon.

ZRR REALTY SOUTH WATERFRONT PROPERTY

Interim Site Management Plan Developer Summary



DEQ NOTIFICATION (Section 6.1)

Project Type	Required Notification	Timeframe Required
Small Projects (<10 cubic yards of soil managed)	Informal - Phone Call/Email to Cleanup Program manager to describe work actions and controls	One calendar week prior to start of work
Large Projects (>10 cubic yards of soil managed)	Periodic consultation with Cleanup Program manager	During work planning
	Submit Remedial Action Plan (RAP)	Submit RAP no later than 30 calendar days prior to the planned start of work. DEQ response to RAP expected 10 business days prior to start of planned construction activities.
	Asbestos Program - ASN-1 form	Submit 10 business days prior to start

Note: Volume of "soil managed" is the total volume of impacted soil that is to be excavated or moved on site or off site.

CONSTRUCTION CONTROLS

All work conducted below the demarcation fabric shall be consistent with the Health and Safety Plan that is approved for the project. (Section 5.2.1)

Air monitoring for the presence of asbestos fibers should be conducted for all large projects in Areas A and B that have the potential to disturb ACM/ACS. (Section 3.1.5)

Daily asbestos exposure monitoring of excavation workers during excavation activities shall be conducted by the certified asbestos abatement contractor in accordance with OAR 437-003. (Section 3.1.5)

All work activities that disturb impacted soils shall be monitored for the generation of dust. Dust shall be controlled through the application of water to minimize the generation of visible dust. (Section 5.2.3)

Soil and mud will be cleared from equipment before the equipment leaves the site. Vehicle tires that have traveled on uncapped soil shall be freed of soil by wheel wash or other equivalent method before leaving the site in order to prevent tracking onto city streets. (Section 5.2.4)

ZRZ REALTY SOUTH WATERFRONT PROPERTY

Interim Site Management Plan

Developer Summary



SOIL DISPOSAL (Section 3.3)

Asbestos Containing Soil (ACS)	Beneath the demarcation fabric, Areas A and B are presumed to contain soil that exceeds an allowable asbestos concentration of 1%, unless sampling is performed to demonstrate that soil does not exceed the allowable level. ACS shall be managed as asbestos containing material (ACM) and requires disposal at an approved landfill (Wasco County Landfill is preferred) or as otherwise approved by DEQ. Notify DEQ by ASN-1 form, prepare ASN-4 Form for disposal records, and obtain landfill disposal permit. (Section 3.3)
Chemical Contaminated Soil (Landfill Disposal)	Chemically impacted soil may or may not also be asbestos impacted (ACS, see above). Remaining soil onsite beneath demarcation fabric has the potential to exceed disposal limits - i.e. qualifying as hazardous or regulated waste. The local hazardous waste landfill (Chemical Waste Management of the Northwest, Arlington, Oregon) does not maintain staff who are asbestos trained. Therefore, there is a preference to perform onsite treatment on all excavated soil to levels that are below disposal limits (i.e. non-hazardous). Regulated waste does not require onsite treatment prior to disposal at the hazardous waste landfill (Section 3.3)
Chemical Contaminated Soil (Engineered Containment Cell)	Soil that is generated during remedial or development activities is allowed to be re-placed onsite in an engineered containment cell, as approved by DEQ. (Section 3.4.1)
Chemical Contaminated Soil (Alternative Placement)	Soil that is non-hazardous may qualify for controlled placement at an alternate site upon approval by DEQ, and must satisfy the DEQ limits for appropriate site uses (industrial, residential, or site specific criteria). (Section 3.2.5)
Unrestricted Use	Soil that is suspected to not be significantly contaminated may qualify for unrestricted use upon approval by DEQ, and must satisfy the requirement of Appendix C. (Section 3.3)

ZRZ REALTY SOUTH WATERFRONT PROPERTY

Interim Site Management Plan

Developer Summary



TRAINING REQUIREMENTS (Section 5.2.2)

Within 2 Feet of the Demarcation Fabric	All personnel performing any excavation activities on the site that have the potential to occur within two feet of the demarcation fabric should receive site specific safety training. Training must include basic awareness of the demarcation fabric and a statement that soil below this orange fabric layer is contaminated and shall not be disturbed.
Below Demarcation Fabric (Areas A and B)	All personnel that are required to excavate below the demarcation fabric shall have training that satisfies the site awareness training protocols required by Oregon OSHA. The training shall at a minimum include a description of the nature of the asbestos and chemical contamination at the site, as appropriate to the area where work is being conducted. Additional occupational training is required by OSHA and DEQ as follows: • 40 hour HAZWOPER Training - for all workers who may reasonably be expected to be exposed to chemical contamination (contact, inhale, ingest) • Asbestos Worker Training - for all workers who are conducting work with asbestos containing material and/or asbestos containing soil. Asbestos workers must be under the direction of a licensed asbestos supervisor
Below Demarcation Fabric (Area C)	All personnel that are required to excavate below the demarcation fabric shall have training that satisfies the site awareness training protocols required by Oregon OSHA for work on hazardous sites. The training shall at a minimum include a description of the nature of the chemical contamination at the site, as appropriate to the area where work is being conducted. Additional occupational training is required by OSHA as follows: • 40 hour HAZWOPER Training - for all workers who may reasonably be expected to be exposed to chemical contamination (contact, inhale, ingest)

CLEAN CAP

Soil Caps	A clean cap consisting of two feet of vegetated soil or other non-erodible equivalent material over demarcation fabric is required over all contaminated soil remaining at the site. (Section 3.4)
Asphalt or Concrete Caps	Caps consisting of other engineered non-erodible materials (ex. concrete or asphalt) may be substituted for a two foot soil cap. (Section 3.4)
Utility Corridors	Soil or fill placed within a public right-of-way or utility corridor must be clean within a five foot thickness from the final street grade. (Section 3.6)
Temporary Cap	A temporary cap for protection of construction workers may be constructed to reduce worker training requirements on top of the cap. The temporary cap shall consist of 12 inches of crushed rock over demarcation fabric. (Section 3.4.4)

ZRZ REALTY SOUTH WATERFRONT PROPERTY

Interim Site Management Plan

Developer Summary



ASBESTOS OVERSIGHT

Soil Handling	All excavation work within ACS areas shall be conducted with the oversight of a licensed asbestos supervisor and shall be conducted by asbestos trained workers. (Section 3.1)
Asbestos Pits	Asbestos pits (identified by the persistence of abundant bulk ACM for more than five cubic yards) have been historically noted to be present on riverbanks. Asbestos pits must be excavated and managed by a certified asbestos abatement contractor. (Section 3.1.1)
Bulk Asbestos	ACMs that are readily observable/recoverable (to the extent practicable) during the course of excavation work should be removed from soil by trained asbestos workers. (Section 3.1.2)
Regulated Areas	All earthwork activities with the potential to disturb ACM/ACS must be completed within a designated "regulated area" in accordance with OSHA requirements. (Section 3.1.4)

SITE CONTROLS

Fencing & Signage	Fencing is required to prevent public access to areas that have not been capped in accordance with this plan. Fencing should be consistent with existing site fencing. Signage shall be posted at regular intervals on the fence stating "Warning! Hazardous Materials - No Trespassing" (Section 5.1)
	Site fencing may be removed following the placement of a final engineered cap or equivalent. (Section 5.1)

GROUNDWATER

Discharge Requirements	Groundwater generated during construction will require treatment or discharge to the sanitary sewer, under the terms of the Batch Discharge Permit. (Section 4.2)
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STORMWATER

Recontamination Analysis	If a new stormwater outfall discharges onto the ZRZ sediment cap, then a recontamination evaluation is required for the sediment cap. (Section 4.3.1))
Stormwater Runoff	Stormwater runoff shall be managed consistent with the City of Portland Stormwater Management Manual as well as the City Sewer and Drainage Facilities Manual, City Plumbing Code and any other relevant regulation. (Section 4.3.2)
Stormwater Infiltration	Infiltration of stormwater generated at the site is not prohibited, though DEQ approval is required prior to construction of infiltration facilities.(Section 4.3.3)

ZRZ REALTY SOUTH WATERFRONT PROPERTY

Interim Site Management Plan

Developer Summary



SOIL MANAGEMENT TABLE

ZRZ Area	Depth of Contamination Below Demarcation Fabric (Section 2.2 & 2.3)	Chemical Impacts	Asbestos Impacts	Training Requirement (Section 5.2.2)	Handling Priority ¹	Waste Characterization ² (Section 3.3.2)	Disposal (Section 3.3)
Area A	0 - 30 feet	Yes	Yes	Asbestos/HAZWOPER	Asbestos	PCBs, TCLP - Cd, Cr, Hg, Pb	Asbestos and Hazardous or Non-Hazardous
Area B	0 - 30 feet	Yes	Yes	Asbestos/HAZWOPER	Asbestos	PCBs, TCLP - Cd, Cr, Hg, Pb	Asbestos and Hazardous or Non-Hazardous
	3 - 30 feet	Yes	No	HAZWOPER	Chemical	PCBs, TCLP - Cd, Cr, Hg, Pb	Hazardous or Non-Hazardous
Area C	0 - 3 feet	Yes	No	HAZWOPER	Chemical	PCBs, TCLP - Cd, Cr, Hg, Pb	Hazardous or Non-Hazardous
	3 - 30 feet	No	No	HAZWOPER	Dust	NA	Non-Hazardous

Notes: ¹Air monitoring for the presence of asbestos fibers should be conducted for all large projects in Areas A and B that have the potential to disturb ACM/ACS. All approved soil activities require application of water to prevent the generation of visible dust. Dry excavation, shoveling or sweeping is not allowed.

²Asbestos is assumed to be greater than 1% in specified soil unless asbestos sampling is performed and approved by DEQ.

NA = Not Applicable

APPROVED SOIL ACTIVITIES (3.2)

- Excavation
- Onsite hauling and dumping
- Sorting
- Screening
- Backfilling
- Compaction
- Grading
- Stockpiling
- Onsite treatment for metals in soil (Section 3.3.5)
- Rock/concrete crushing
- Crushed concrete reuse

- Note:**
1. All activities with contaminated soil require the development of a Remedial Action Plan and DEQ approval.
 2. The activities in this table are allowed for contaminated soil with appropriate control and procedures, as described in the Interim Site Management Plan.
 3. All approved soil activities require application of water to prevent the generation of visible dust. Dry excavation, shoveling or sweeping is not allowed.
 4. See Asbestos Oversight (page 4) if asbestos is encountered during approved soil activities.



**Figure 2-2
Distribution of
Asbestos in Soil**

Interim Site Management Plan
ZRZ Realty Company
Portland, Oregon
2012

NOT FOR CONSTRUCTION

Legend

- ROD Greenway Boundary
- Existing Top of Bank
- Existing Ordinary High Water (18 ft)
- Former Ordinary Low Water (3 ft)
- Zidell Property Boundary
- Possible Historical Asbestos Handling Areas
- AREA A**
Asbestos Contamination Observed at all Depths
- AREA B**
Shallow Asbestos Contamination in Operationally Disturbed Zone (at 3 ft depth)
- AREA C**
No Asbestos Contamination Observed Below Existing Asphalt

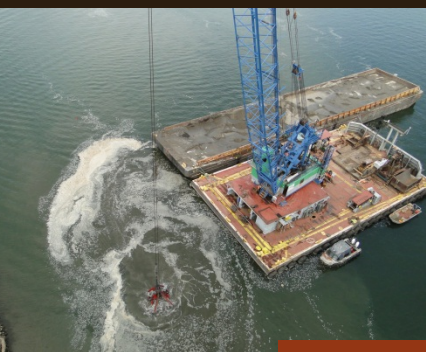
0 125 250
Feet



Source: Aerial photograph (2011) obtained from Metro Data Resource Center; property boundary surveyed by Olson Engineering (2007); Top of Bank obtained from City of Portland.

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