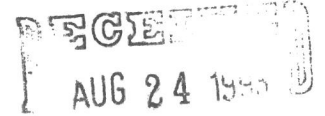




CITY OF
PORTLAND, OREGON
BUREAU OF PLANNING


Charlie Hales, Commissioner
Robert E. Stacey, Jr., Director
1120 S.W. 5th, Room 1002
Portland, Oregon 97204-1966
Telephone: (503) 823-7700
FAX (503) 823-7800

August 24, 1993



MEMORANDUM

TO: John Sewell, Bureau of Parks

FROM: Gail Curtis, City Planner 

RE: Winmar Trail

Please consider the following trail proposal and make additions or deletions and return to me as soon as possible. We would like to propose something to Rick Holt this week. Rick is available to meet this Friday at 9:00 am (10th floor). Myself and hopefully, Cece will be the only staff present representing the Planning Bureau. Are you and/or others available?

Note: It has been determined that the water level will be maintained below the trail level.

PROPOSAL

1. Winmar builds a 6- foot wide "fibar" trail in the location they have proposed with modification for a connection to the boardwalk (ie Nancy's drawing).
2. Winmar pays for the trail system as necessary; and contributes to the boardwalk based on the standard trail rate of \$16.00/lineal foot. ($\$16.00 \times 250' = \$4,000$ or approximately 1/3 of the cost). The balance of the boardwalk is paid for by the City and constructed no more than one year after the trail is constructed.
3. Winmar has maintenance responsibility for the trail for 3 years. The City has maintenance for the boardwalk portion only. The City has immediate liability for the trail and boardwalk.
4. At the end of the 5 year trail-demonstration period, the City has maintenance responsibility for the trail understanding that at this time the City has the option to abandon the trail or its' use temporarily or permanently because of the ~~potential~~ failure of the "fibar" system.



PORTLAND PARKS AND RECREATION



1120 SW FIFTH AVE, SUITE 1302, PORTLAND, OREGON 97204-1933
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CHARLIE HALES, COMMISSIONER

CHARLES JORDAN, DIRECTOR

FAX COVER SHEET

Date AUG. 26. 1993

To SISAN DESAMP &
CELE HUGHLEY

Fax # 823-3014

From Nancy Gronowski
Portland Parks and Recreation

Phone 823-6005

Fax # (503) 823-5297

Comments COPIES OF CARDS WEND TO
BOB STREET & PARKS MEMO TO
SHELLA PRUGOLI ON CONDITIONS FOR
ACCEPTING TRAIL. CALL IF YOU NEED
MORE INFO.

This transmission consists of _____ pages including this cover sheet.

PORTLAND PARKS AND RECREATION



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CHARLIE HALES, COMMISSIONER

CHARLES JORDAN, DIRECTOR

August 24, 1993

MEMORANDUM

To: Sheila Frugoli

From: John Sewell
Jim Sjulín
Nancy Gronowski

Subject: **PARKS CONDITIONS FOR ACCEPTING TRAIL AT WINMAR
PROPERTY IN COLUMBIA SOUTH SHORE SLOUGH AREA**

Parks will accept future maintenance of the recreation trail on the Winmar property if it is built to the following standards, on the following alignment, and with the following conditions:

At the intersection of Airport Way and the paved driveway for the BES pump station, the trail can go on the BES paved and graveled access road (per conversation with Russ Lawrence) for a distance of 600'. No maintenance by Parks is required here. This provides a connection to the trail section on Airport Way which is not shown on the applicant's plans.

The trail will go to the south end of the gravel access road. At this point, it will stay on the top of the treatment pond embankment at an elevation of approximately 14' for a distance of 300'. The trail will be constructed to Parks soft-surface trail standard of a 6' width on an 8' base.

At this point the trail follows the alignment shown on the applicants drawings with the following differences - the walking surface of the trail is to be built to a 6' width using the Fibar System 300 or equal. The applicant can either taper the Fibar material to meet the ground or use a containment system recommended by the manufacturer. If applicant deviates from manufacturer's recommendations, he must guarantee that the system will work. The elevation along this alignment is shown at 11' or 12' NGVD (mean sea level) and will be above the water level of the slough, although it will be within the wetland area and it is expected to be very wet during much of the year. Thick stands of reed canary grass grow now on the site at the 11' - 12' elevation.

Based on examination of the applicant's drawings and planting plans, Parks expects it will be necessary in future to mow the edges of the trail to provide visual access to the water and the resource. Unless there are heavy plantings of other materials to crowd out the reed canary grass and other undesirable plants, hand mowing will be required to keep down the canary grass which is presently growing on the site.

Because of the uncertainty of the accessibility of the site by the public during much of the year and the potential for seasonal loss of connectivity, Parks feels that the applicant should provide access to the resource by the public. This should be in the form of a 250' section of boardwalk leading to a small observation platform. If the Fibar system should fail over time, there would at least be some amenity on the site to make up for the public having to use the sidewalk on Airport Way as the connection to the rest of the 40 Mile Loop Trail.

Because this is an experimental application of a trail system in a wetland area, Parks will only take over the maintenance of it when it has been demonstrated that it can be successfully maintained for a period of 3 years, from the time of trail and planting installations.

If this is not acceptable to the applicant, the trail alignment should go along the edge of the resource outside the wetland area along the back of the applicants property consistent with trail requirements for other property owners in the Sough Shore area.

cc: Gail Curtis

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CHARLIE HALES, COMMISSIONER

CHARLES JORDAN, DIRECTOR

August 13, 1993

MEMORANDUM

To: Bob Stacey

From: Charles Jordan 

Subject: RECREATION TRAIL STANDARDS

After careful review of the requirements for recreation trail standards in the Columbia South Shore Slough area and an examination of the particular conditions on the Winmar-Pacific site, Parks has determined that it is important for the trail standards as written in the Columbia South Shore Slough Trail Master Plan to remain in effect for the following reasons.

This area is particularly deficient in park and recreation facilities. The recreation trail is the one of the few public recreation facilities in the area. To build it to less than standard condition would deprive the public of what little recreation opportunities there are now.

Typical recreation trail standards in other parts of the City require construction of an 8' to 12' paved trail. The recreation trail standards in the Columbia South Shore are considerably less than those requirements. Because of resource protection considerations, the trail standards here are for a 6' wide soft surface trail on an 8' gravel base. This allows access to the slough and wildlife areas while discouraging use by cyclists. The 8' base is to allow access by Park vehicles for maintenance.

The particular trail section on the Winmar-Pacific property is in a wetland area which makes it even more important to have the trail constructed on a gravel base. The base provides for drainage of the trail which will allow the public access during most of the year. Construction of a 5' trail with no sub-base will prevent access during many months of wet and rainy weather.

Maintenance considerations provide additional reasons for building the trail to standards. The 8' gravel base allows access by standard park vehicles to maintain and patrol the trail. It allows for litter pick-up, trail surface replenishment and removal of encroaching trees and shrubs.

Recreation Trail Standards

Page 2

A trail built to a 5' width with no sub-base in any area will deteriorate quickly. In an area which is wet much of the time, it will deteriorate even more quickly. Because there is no sub-base for vehicle access, replenishment of the trail surface will be much more difficult.

Additionally, public safety will be compromised if the trail is built to a 5' width. A narrow trail with no sub-base will prevent access by emergency vehicles for fire suppression and emergency rescue.

If the trail is built to the standards in the Columbia South Shore Trail Master Plan, Parks is willing to accept its future maintenance as specified in the City Code. However, if it is not built to those standards, it is not in the public interest for Parks to be burdened with it or for it to be a public recreation trail.

Parks and Recreation recommends that the developer build the trail to standard.

cc: Charlie Hales, Commissioner of Public Affairs
Sheila Frugoli, Planning
Connie Lively, PDC
John Sewell, Parks
Jim Sjulín, Parks
Nancy Gronowski, Parks

FYI - Cece Hughley



CITY OF

PORTLAND, OREGON

BUREAU OF PLANNING


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Robert E. Stacey, Jr., Director
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Portland, Oregon 97204-1966
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FAX (503) 823-7800

September 2, 1993

RECEIVED
SEP 03 1993

Memorandum

TO: Elizabeth Normand, Hearings Officer

FROM: Sheila Frugoli, AICP, City Planner 

RE: Alternatives and additional information regarding
LUR 93-00295 EN Appeal

After numerous concerns and suggestions were raised at the appeal hearing for the Winmar property, the hearing was continued to September 7, 1993. You asked staff, the applicant and other interested parties to investigate other alternatives, to those proposed by Planning staff.

Before I provide an analysis of two new alternative, I must clarify an issue you brought up at the hearing. You noticed that the staff recommendation of moving the trail to Airport Way seemed to conflict with the mapping designation. You were correct. I erred in suggesting this as an alternative. This alternative would require a Zoning Map amendment to move the trail from the resource area to the right-of-way. The adopted **South Shore Recreational Trail Master Plan** identifies Airport Way as a bicycle route but states the decision for the pedestrian alignment must be made through this land use review. There is nothing available in this Environmental Review which would give us authority to move it off of the site.

The attached memorandum from the Parks Bureau staff describes one alternative in detail and briefly describes the other. The attached site plan illustrates the two alternatives. A description and staff analysis of those alternatives is provide on the following pages:

Alternative 1: Fibar Trail and Boardwalk Viewpoint

This alignment is similar to that proposed by the applicant however the trail would follow the access road used by the Bureau of Environmental Services, west of the water treatment facility. Then a soft surface trail must be constructed at the top of the treatment pond embankment. At this point the alignment will follow that of the applicants. A Fibar trail would be constructed at a width of six feet with a containment system. The Parks Bureau states they would take over the maintenance and liability responsibilities if it is found that the Fibar system can be maintained for a three year period.

Because of the maintenance and durability concerns, as well as concerns that the trail would not be usable during certain time of the year, a boardwalk and viewing area should also be developed. This boardwalk would extend from the pond embankment, south 250 feet, to the edge of the emergent wetlands. This walkway would allow the public to be close to this enhanced habitat area, while not directly impacting it.

Staff Comments: This alternative addresses the applicants concerns about future maintenance and liability responsibilities. It satisfies the neighborhood and trail advocates request that the trail extend into the resource area. It provides adequate assurance for the Parks Bureau that the alignment and surfaces can be maintained and that a viewing area is available when the trail is not passable during the rainy season.

This alternative alignment, with the wider Fibar trail (from five feet to six feet) and the boardwalk will not require any additional fill. This new alternative will not significantly differ in impacts to the environmental resource area. This alignment would have fewer impacts than the original proposal because the western segment of the trail will be moved upland outside of the enhancement area. Any impact to the resource would be found in the placement of pilings to support the boardwalk. However, if the structure were built at the same time as the wetlands are created, then the planting pattern could be place around the pilings so that the impacts to the habitat values would be minimal.

The impacts to the resource would be greater than not building the trail inside of the resource area. But, Section 33.430.340 G. 1. provides criteria which states that the recreational trail should have as few significant detrimental environmental impacts on functional values as it practical. The proposal has reduced the impacts while appreciably enhancing the recreational experience.

Alternative 2: Recreational Trail Provided Along Edge of Development Sites

Retain the trail on the site. But, move it north of the enhancement area, at the edge of the water treatment facility and Lots 6 through 8. The trail would be located away from the slough, however; it would provide a separation from auto and truck traffic and would provide a natural setting on the southern side of the trail. If built to the City's soft surface standards, the Parks Bureau would take maintenance and liability responsibilities.

Staff Comments: Because the trail remains on the site, a Zoning Map amendment would not be necessary. This alignment would probably not satisfy the desires of the trail advocates or neighborhood. The Winmar Corporation does not favor this alternative. However, the Parks Bureau would have assurance that the trail could be maintained. Because the trail would be located outside of the enhancement area, there would be no resource impacts.

Alternative 3: Build Trail along proposed alignment at Park Bureau Standards

There have been inter-agency discussions regarding whether Fibar constitutes fill. If there is the determination that it does, then the Winmar Corporation will have to request a fill permit for the development of a trail inside the enhancement area. The Parks Bureau suggest that if a fill permit is necessary, that the applicant request the necessary amount of fill so that the trail can be built to the City's standards.

Staff Comments: The Planning Bureau's findings in the original decision state that a trail built to standards would create significant detrimental impact to the resource area. The report findings state (page 6):

As proposed, with the small width and lack of sub-grade, the construction of the trail will result in minimal disturbance possible to trees, tree roots, and other significant vegetation. . . The impacts to trees and tree roots would be greater with the construction of a trail with a subgrade. The greater width would also result in further disturbance to the site. The trail as proposed by the applicant will have fewer significant detrimental environmental impacts on the functional values of the site.

The Planning Bureau finds that a eight foot wide, 4-inch deep gravel base would be of greater impact and should not be built in this environmentally-sensitive area. Therefore, the Planning Bureau continues to find that Alternative 1 meets

the trail requirements and satisfies the concerns of the applicant and neighborhood groups.

attach: Parks Bureau memorandum
 Site Plan - trail alignment alternatives

cc: Richard Holt, Holt and Haugh
 Nancy Gronowski, Parks
 Jim Sjulín, Parks
 John Sewell, Parks
 Susan Descamp, Assistant, Commissioner Hales
 Cece Hughley, Assistant, Commissioner Hales
 Alice Blatt
 Connie Lively, PDC
 Tim Hayford, Water District
 Gail Curtis, Long Range Planning

PORTLAND PARKS AND RECREATION



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CHARLIE HALES, COMMISSIONER

CHARLES JORDAN, DIRECTOR

August 24, 1993

MEMORANDUM

To: Sheila Frugoli

From: John Sewell
Jim Sjulín
Nancy Gronowski

Subject: **PARKS CONDITIONS FOR ACCEPTING TRAIL AT WINMAR
PROPERTY IN COLUMBIA SOUTH SHORE SLOUGH AREA**

RECEIVED

AUG 24 1993

CITY OF PORTLAND
BUREAU OF PARKS AND RECREATION

Parks will accept future maintenance of the recreation trail on the Winmar property if it is built to the following standards, on the following alignment, and with the following conditions:

At the intersection of Airport Way and the paved driveway for the BES pump station, the trail can go on the BES paved and graveled access road (per conversation with Russ Lawrence) for a distance of 600'. No maintenance by Parks is required here. This provides a connection to the trail section on Airport Way which is not shown on the applicant's plans.

The trail will go to the south end of the gravel access road. At this point, it will stay on the top of the treatment pond embankment at an elevation of approximately 14' for a distance of 300'. The trail will be constructed to Parks soft-surface trail standard of a 6' width on an 8' base.

At this point the trail follows the alignment shown on the applicants drawings with the following differences - the walking surface of the trail is to be built to a 6' width using the Fibar System 300 or equal. The applicant can either taper the Fibar material to meet the ground or use a containment system recommended by the manufacturer. If applicant deviates from manufacturer's recommendations, he must guarantee that the system will work. The elevation along this alignment is shown at 11' or 12' NGVD (mean sea level) and will be above the water level of the slough, although it will be within the wetland area and it is expected to be very wet during much of the year. Thick stands of reed canary grass grow now on the site at the 11' - 12' elevation.

Based on examination of the applicant's drawings and planting plans, Parks expects it will be necessary in future to mow the edges of the trail to provide visual access to the water and the resource. Unless there are heavy plantings of other materials to crowd out the reed canary grass and other undesirable plants, hand mowing will be required to keep down the canary grass which is presently growing on the site.

Because of the uncertainty of the accessibility of the site by the public during much of the year and the potential for seasonal loss of connectivity, Parks feels that the applicant should provide access to the resource by the public. This should be in the form of a 250' section of boardwalk leading to a small observation platform. If the Fibar system should fail over time, there would at least be some amenity on the site to make up for the public having to use the sidewalk on Airport Way as the connection to the rest of the 40 Mile Loop Trail.

Because this is an experimental application of a trail system in a wetland area, Parks will only take over the maintenance of it when it has been demonstrated that it can be successfully maintained for a period of 3 years, from the time of trail and planting installations.

If this is not acceptable to the applicant, the trail alignment should go along the edge of the resource outside the wetland area along the back of the applicants property consistent with trail requirements for other property owners in the Sough Shore area.

cc: Gail Curtis

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CHARLIE HALES, COMMISSIONER

CHARLES JORDAN, DIRECTOR

September 3, 1993

TO: Sheila Frugoli
Bureau of Planning

FROM: John Sewell
Jim Sjulín
Nancy Gronowski Nancy

RE: Trail at Winmar Property in Columbia South Shore Slough Area
(LUR 93-00295 en)

Information received this week from the Division of State Lands indicating that organic material such as Fibar is considered by the State to be fill material has prompted Parks and Recreation to re-state its recommendations regarding the required trail on the Winmar property. This memo supercedes our memo to you dated August 24th.

Parks and Recreation staff prefers the following alignment: At the intersection of NE Airport Way and the paved driveway for the BES pump station, the trail should follow the BES paved and graveled access road (per conversation with Russ Lawrence) for a distance of 600 feet. No trailbed construction and little maintenance would be needed here. This provides a connection to the trail section on Airport Way which is not shown on the applicant's plans. From the south end of the gravel access road, the trail runs on the top of the treatment pond embankment at an elevation of approximately 14 ft. for a distance of 300 feet. From the east end of the preceding segment, the trail should run east skirting the north edge of the resource area, remaining in the "eg-2" area to avoid developable land and to avoid the resource area, running approximately 1,800 feet to the toe of the Airport Way embankment. The trail should then run south close to the toe of the Airport Way embankment approximately 500 feet to a point which enables a turn to the east for a segment underpassing the Airport Way bridge over the Columbia Slough. Except for the first 600 foot segment, the entire trail as described here should be built to the standard specification found in the *Columbia South Shore Slough Trail Master Plan*.

In order to provide access to the Slough desired by the neighborhood, Parks and Recreation remains supportive of a 200-250 foot boardwalk spur from the above alignment to a wildlife observation viewpoint. Parks and Recreation recognizes that this boardwalk may exceed what is required from the applicant, but now asks for an easement to enable its future development and would welcome any contribution toward its implementation.

Parks and Recreation would also consider accepting a boardwalk trail along the mitigation site next to the Slough, but having concerns about longer term maintenance of substantial lengths of boardwalk, we would want to utilize a reasonable construction standard. Recognizing that the applicant still has the option of applying for fill permits needed for a trail built along the mitigation site next to the Slough, Parks and Recreation would accept a trail in this alignment if built to Master Plan standard specifications.

c: Charlie Hales, Commissioner of Public Safety
Charles Jordan, Director of Parks and Recreation

Friday, October 15, 1993

11:56

From:

Name: Rick Holt

Company: Holt & Haugh, Inc.

Phone: (503) 222-5522

Fax: (503) 222-6649

To:

Name: Ms. Cece Hughley

Company: City Of Portland, Oregon

Phone: (503) 823-4686

Fax: 823.3014

Total number of pages, including cover: 15

Message:

CECE, I AM FORWARDING AN UPDATE ON THE CORRESPONDENCE RE. THE TRAIL ROUTING IN SOUTH SHORE AND PARKS ACCEPTANCE OF THE MAINT. AND LIABILITY. PLEASE CALL...222-5522

Rick Holt } 10/18/93

Parks

↓ live up to their end of the deal on pay'g for maintenance as per our conversation earlier

Trail Master Plan appeal

→ Parks needs to defend their maintenance standards

27 September 1993

Mr. John Sewell
Portland Parks and Recreation
1120 SW Fifth Avenue
Portland OR 97204-1933

RE: COLUMBIA SOUTH SHORE TRAIL MAINTENANCE

Dear John:

Contrary to testimony made before the hearings' officer by Metro's Ralph Rogers, Ken Bierly, at the Department of State Lands (DSL) is not only prepared to modify the existing fill permit to accommodate the wetland route of the Trail, he indicated a preference of that route to the alternatives. The U. S. Corps of Engineers does not regulate organic fill, however they will be notified of our planned actions as a courtesy.

The only remaining issue, then, is Portland Parks' acceptance of the Trail maintenance. There is a five year FIBAR/SOF-FAL (or like product) warranty as we discussed in our meeting at Commissioner Hales' office. There is also a \$1,000,000 product liability insurance that comes with the contract and is assignable to Parks.

Sincerely,

Richard E. Holt

cc Gail Curtiss
Cece Hughley
Steve Pfeiffer
Tom Kuper
Tim Puryear

SUMMARY

The permit modification requested should be approved because of the:

- minimal organic fill for the "soft trail;
- intent to avoid impact on wetland resources;
- greater educational access with minimal impact; and
- consensus by the majority of interested parties.

Sincerely,

Richard E. Holt

cc Tim Puryear
Tom Kuper
Steve Pfeiffer

Attachments

CONSENSUS BUILDING

Alternatives that were considered for the trail took into account routing, composition, use (purpose), environmental impact and cost. The work group participants that considered the alternatives, besides yourself, included the design engineer, City Planning staff, East Side Coalition of Neighborhoods, trail coordinator, land use attorney, Commissioner Hales' office and the Bureau of Parks.

TRAIL ROUTES

The Cities Comprehensive Trail Plan route was shown schematically in the center of the Columbia Slough. The initial concept by Trail Planners was to route the trail from Four Corners near the pump station on the West side of the Slough going South until turning East...at which time the trail would continue East on the South side of the Slough crossing under the Airport Way overpass to the Spada property.

The second route proposed was in response to ODFW's concerns that too much intrusion into the mitigation area planned in the initial concept would hinder its development and use by wildlife. The trail would also avoid the Four Corners area and be moved to the East side of the Slough and cross behind Water Quality Pond #5, then along the North side of the Slough on the "soft trail" to the Spada property.

The third route for the nature trail would avoid the environmental area altogether by not going through any habitat but instead being routed along the southernmost portions of the development land adjacent to the parking areas.

The second and third routes are what was approved by the Hearings' Officer. The second route would use the "soft trail" to minimize impact, yet provide superior educational and maintenance access. The second route has the support of:

- City Planning;
- East Side Coalition of Neighborhoods;
- Commissioner Hales' office;
- Portland Trail Planning; and
- Wetland Planning and Engineering Design professionals.

SOFT TRAIL

The FIBAR trail that is proposed through the environmental zone would be six inches thick and six feet wide on top of graded, native soil. The trail would be in the ecotone designed between the forested wetland edge and the riparian wetland. The ecotone, by necessity, will be an elevated berm to maintain the hydrologic integrity of the forested wetland and would prevent the introduction of Slough water.

The FIBAR was selected because it is a manufactured organic material that meets ADA requirements, and, in addition, is also a leading-edge material used to minimize environmental impact. It requires no gravel sub-base, therefore no inorganic fills; it requires no excavation, therefore the adjacent tree roots are not disturbed. Lastly, FIBAR is easily maintained and can be installed by the manufacturer with a five year warranty.



21 September 1993

Mr. Randall Jones
Scientific Resources, Inc.
11830 SW Kerr Parkway
Lake Oswego OR 97035

RE: WINMAR WETLAND PERMIT MODIFICATIONS
TRAIL ROUTE & DESIGN; USCOE NOTIFICATION OF
DELAY

Dear Randy:

Thank you for your counsel and support in making the "Trail" presentation to Ken Bierly on September 20.

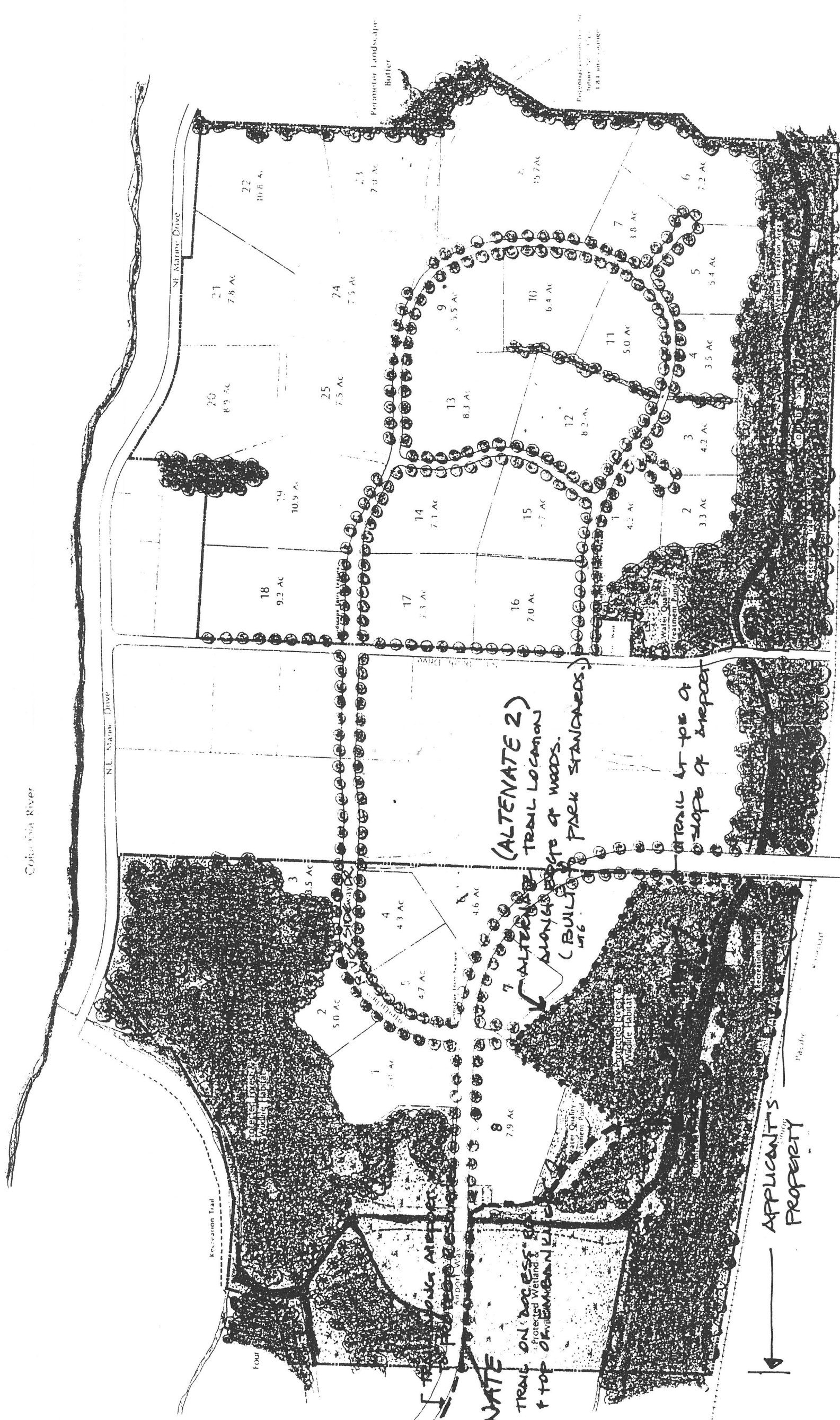
In keeping with Ken's direction, the following is provided for your use in preparing a request for permit modification and notice of mitigation delay. Additionally, please prepare a Notification of Intent for the U. S. Corps of Engineers (Corps) indicating our intention to modify the DSL permit, placing approximately 400 cubic yards of organic FIBAR trail surface necessary to complete the City of Portland's Recreational Trail. The Corps does not regulate activity such as the organic "Trail" work. We recognize the sensitivity of any activity in the area and wish to keep them informed. Please stress our intent in constructing the trail and placing the FIBAR material during the mitigation work, thereby minimizing environmental impact. The trail would be constructed during the mitigation work.

Lastly, the initiation of the mitigation plan has been delayed one season because of the process of gaining an Environmental Review for resource enhancement approval (File Number 93-00295EN; approved 17 September 1993). The wetland fill will not be complete until the mitigation work is well under way with a 1994 "date certain" of October 30 for completion of the mitigation grading. All preliminary work has been completed, anticipating construction to begin in 1993.

BACKGROUND - DSL Permit Modification

As a component of the combining of two permit actions (water quality pond #5 and the "egg" mitigation plan), the trail routing has been changed to answer ODFW and DSL's concerns. Final approval at the City level has been delayed as a result of the issues surrounding the recreational trail routing. Both permits were at risk pending this final determination under the Environmental Review. Neither of the State nor Federal permits related wetland impacts to trail placement. The new route keeps the trail on the development side of the Slough, provides educational access to a portion of the environmental area through use of a "soft trail" and provides a beautiful amenity for the Columbia South Shore.

Colorado River



(ALTERNATE 1) TRAIL ON ACCESS TO TOP OF WETLANDS

(ALTERNATE 2) TRAIL LOCATION AWAY FROM WOODS. (BUILT TO PARK STANDARDS)

TRAIL TO TOP OF SLOPE OF SLOPE



WINMARE TRAIL ALIGNMENT
8/26/93



1" = 550'