



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

November 16, 2021

Robert Bobosky
Wolverine Financial, LLC
6770 SW Canyon Dr.
Portland, OR 97225-3650

RE: Lead-Contaminated Soils Area
at Former Vanderzanden Farm in Banks
ECSI #5918

Dear Mr. Bobosky:

The Department of Environmental Quality (DEQ) has been in contact with Green Banks, LLC regarding potential wetlands mitigation work at the former Vanderzanden Farm site, located between Highway 6 and Cedar Canyon Road on the west side of Banks, Oregon.

A portion of the former Vanderzanden Farm is impacted with lead shot from the adjacent Banks Gun Club. An investigation report completed by Farallon Consulting in 2019 estimated that 117,000 square feet of surface soils at the farm had lead concentrations exceeding DEQ's risk-based concentrations (RBCs) for occupational exposures. The extent of contamination exceeding ecological screening-level values (SLVs) has not been determined.

DEQ understands that a portion of the former Vanderzanden Farm along West Fork Dairy Creek is being proposed for use as a wetlands mitigation bank. DEQ also understands that a parking lot will be established on the farm site to provide increased access to West Fork Dairy Creek for mitigation work.

DEQ originally agreed to delay cleanup of the lead shot contamination with the understanding that you were in contact with the Banks Gun Club regarding liability for the contamination, and with the understanding that the contamination was in an unused, isolated area. With the increase in activities at the site, it is time to address the contamination.

Please work with your environmental consultant to prepare a plan to limit public access to the contaminated area, and to prepare a sampling and analysis plan (SAP) to determine if the contamination has impacted the proposed wetlands mitigation bank. If contamination has impacted a portion of the mitigation bank, you may be able to fund the associated cleanup and restoration costs as part of the enhancement of the wetlands.

Please contact me by phone at (503) 229-5369, or via e-mail at kevin.dana@deq.state.or.us, if you have any questions about this letter or about the path forward at your property. DEQ looks

forward to working with you to revitalize the former Vanderzanden Farm and to address the contamination at the site.

Sincerely,

A handwritten signature in blue ink that reads "Kevin Dana". The signature is written in a cursive, flowing style.

Kevin Dana, Project Manager
Northwest Region Cleanup Program

cc: C. Jonas Moiel, Green Banks LLC
Jennifer Whaler, Farallon Consulting
Haley Teach, DEQ