



October 22, 2025

Project No. M1419.14.007

Lorenzo Danielson, J.D.  
PPA Coordinator and Legal Policy Analyst  
Oregon Department of Environmental Quality  
Sent via email to [Lorenzo.Danielson@deq.oregon.gov](mailto:Lorenzo.Danielson@deq.oregon.gov)

Donald E. Hanson, RG  
Project Manager, Hydrogeologist  
Oregon Department of Environmental Quality  
Sent via email to [don.hanson@deq.oregon.gov](mailto:don.hanson@deq.oregon.gov)

Re: Closeout Report – Tax Lots 500 and 600, North Central Avenue and Rossanley Drive, Medford  
Oregon, ECSI Site Identification Number 537

Dear Lorenzo Danielson and Donald Hanson:

Maul Foster & Alongi, Inc. has prepared the attached document for tax lots 372W24500 and 372W24600 located northwest of the corner of North Central Avenue and Rossanley Drive, in Medford, Oregon (the Property) pursuant to Section 12 of the Order on Consent issued by the Director of Oregon Department of Environmental Quality (DEQ No 23-03), as signed by DEQ on May 8, 2024.

The remedial work described in this Closeout Report involved recording the easement and equitable servitudes for the Property, installing fencing to control access, installing landscaping around the boundary of the Property, decommissioning of the stormwater sewer system, and developing a Site Management Plan. With submittal of this document and following approval, the Property owner, Roseburg Forest Products Company, requests that DEQ initiate the certification decision and Order on Consent termination process specified in Section 12 of the Order on Consent.

We appreciate your continued involvement and support on this project.

Sincerely,

Maul Foster & Alongi, Inc.

Caitlin Bryan  
Principal Environmental Scientist

Andrew Vidourek, RG  
Senior Geologist

## Attachments

Closeout Report — Tax Lots 500 and 600, North Central Avenue and Rossanley Drive, Medford  
Oregon, ECSI Site Identification Number 537

cc: Gabrielle Thompson, Roseburg Forest Products (gabrielle.thompson@rfpco.com)

# Attachment

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## Closeout Report



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# Closeout Report

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Tax Lots 500 and 600, North Central Avenue  
and Rossanley Drive, Medford Oregon

ECSI Site Identification Number 537

*Prepared for:*

**Roseburg Forest Products Company**

October 22, 2025

Project No. M1419.14.007

*Prepared by:*

Maul Foster & Alongi, Inc.

3140 NE Broadway, Portland, OR 97232

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# Draft Closeout Report

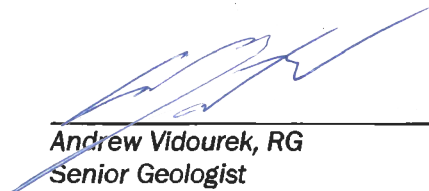
Tax Lots 500 and 600, North Central Avenue and Rossanley Drive, Medford  
Oregon

## ECSI Site Identification Number 537

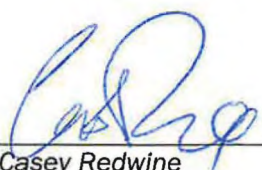
*The material and data in this report were prepared under the supervision and direction of the undersigned. As stated in this report, the undersigned certify that the closeout actions for tax lots 372W24500 and 372W24600 were completed in accordance with the Order on Consent issued by the Director of Oregon Department of Environmental Quality (DEQ No 23-03), as signed by DEQ on May 8, 2024.*

*Maul Foster & Alongi, Inc.*

\_\_\_\_\_  
Garrick Kalmeta, PE  
Project Engineer

  
\_\_\_\_\_  
Andrew Vidourek, RG  
Senior Geologist

*Roseburg Forest Products Company*

  
\_\_\_\_\_  
Casey Redwine  
Forest Manager

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Easement and Equitable Servitudes

# Abbreviations

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Closeout Report	remedial action final closeout report
DEQ	Oregon Department of Environmental Quality
EES	Easement and Equitable Servitudes recorded on September 30, 2025 by Roseburg Forest Products and Oregon Department of Environmental Quality (2025-021032)
EPA	U.S. Environmental Protection Agency
GPR	ground penetrating radar
MFA	Maul Foster & Alongi, Inc.
MFC	Medford Fence Company
the Order	Order on Consent. DEQ No. 23-03 (Jackson County Official Records 2024-009329)
the Property	tax lots 372W24500 and 372W24600 (referred to as tax lots 500 and 600), located northwest of the corner of North Central Avenue and Rossanley Drive, in Medford, Oregon
RFP	Roseburg Forest Products Company
SMP	Site Management Plan
SOW	Remedial Action Scope of Work attached to and incorporated by reference as Exhibit C to the Order on Consent

# 1 Introduction

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Pursuant to Section 12 of the Order on Consent (the Order, DEQ No 23-03) issued by the Director of Oregon Department of Environmental Quality (DEQ) to Roseburg Forest Products Company (RFP) (DEQ 2024a), Maul Foster & Alongi, Inc. (MFA) has prepared this remedial action final closeout report (Closeout Report) for tax lots 372W24500 and 372W24600 (referred to as tax lots 500 and 600), located northwest of the corner of North Central Avenue and Rossanley Drive, in Medford, Oregon (the Property; see Figure 1-1). The remedial work described in this Closeout Report was completed for the Property in accordance with the DEQ approved Site Management Plan (SMP, MFA 2024a), the Stormwater System Decommissioning Work Plan (MFA 2024b), the Vegetation Plan Request for ECSI Site 537 Memorandum (MFA 2025), the relevant provisions of the Order (DEQ 2024a), and in recognition of the timeline extension granted by DEQ (DEQ 2024b).

RFP has completed the Remedial Action Scope of Work attached to and incorporated by reference as Exhibit C to the Order (SOW) that is summarized as follows:

- fence the Property to control access;
- install and maintain landscaping to limit dust migration off-site;
- decommission the stormwater sewer system;
- develop a Site Management Plan; and,
- restrict groundwater use at the Property.

With submittal of this document and following approval, the Property owner, RFP, requests that DEQ initiate the certification decision and the Order termination process specified in Section 12 of the Order.

## 1.1 Background

The Property was previously the central portion of a 104-acre lumber mill (typically referred to as the “MEDCO site”) that operated from the 1920s until 1988. Historical aerial imagery indicates that structures on the Property that were associated with the MEDCO mill were cleared sometime between 1988 and 2000; previous structures included storage sheds, racks, mills, garages, and a portion of a 10-acre log pond. The Property is currently bare land, partially paved, and partially vegetated with grasses, scrub trees, and shrubs. Figure 1-2 shows current and previous Property features of environmental interest.

Multiple investigations have been conducted on the Property in response to releases or as part of the closure and demolition of the previously existing lumber mill. Remaining concentrations in soils and groundwater of dioxins/furans, oil-range hydrocarbons (groundwater only), arsenic, chromium (groundwater only), lead, and benzo(a)pyrene and pyrene (soil only), as well as the prior use of pentachlorophenol on the Property, are managed under the SMP. The presence of these contaminants is also addressed through the institutional and engineering controls required by the

Easement and Equitable Servitudes (EES). The Property was purchased by RFP in 2024, after the Order was issued.

## 2 Completed Actions

Actions required by or relevant to the Order that were completed by RFP at the Property are summarized in the table below and detailed in Sections 2.1 through 2.5.

**Table: Completed Actions Summary**

Action	Completion Date
Prepare SMP	December, 2024
Install perimeter fencing and signage	December, 2024
Complete geophysical survey of stormwater system	December, 2024
Complete 2024 annual site inspection	December, 2024
Decommission stormwater system	February, 2025
Install fire water line	February, 2025
Install infrared security cameras	March, 2025
Plant landscape vegetation	February and September, 2025
Restrict groundwater use	September, 2025

This Closeout report describes the finished actions and the completion dates for the work performed. Additionally, per the Order, during each calendar quarter following the effective date of the Order, and until remedial actions were complete, RFP submitted quarterly progress reports to DEQ via email correspondence, summarizing the following:

- Activities conducted by RFP during the previous three months.
- A summary of sampling, test results, and any other data generated or received during the previous three months.
- A description of any problems experienced by RFP, and actions taken to resolve them.
- Activities scheduled during the next three months.

To date, three quarterly reports have been submitted to DEQ for the Property (MFA 2024a, 2025a, 2025b).

### 2.1 Property Access Controls

Fencing installation, in addition to other access control mechanisms, were completed as described below.

### 2.1.1 Fence Installation

RFP hired Medford Fence Company (MFC) to install fencing around the perimeter of the Property (see Figure 2-1). MFC began the project in August and completed the installation of 7-foot-tall chain link fence topped with barbed wire in December 2024 (see photos in Appendix A). No trespassing signage and gates were installed at key areas along the perimeter. MFC employed mechanical methods, such as an electric auger and other equipment for drilling the post holes and setting the fence poles. No work was performed in the treated soil stockpile area. Less than five cubic yards of soil were impacted as part of the project, and all soil disturbed remained on the Property.

### 2.1.2 Water Line Installation

In February 2025, a water line to be used for fire protection at the active portion of the RFP mill facility was installed by general contractor, Tom Willis. The line was constructed on the northeast portion of the Property and just north of the northern Property boundary (see Figure 2-1). The work began in mid-February and was completed by February 25, 2025.

### 2.1.3 Additional Site Security

Prior to completion of the fence, RFP retained a private security company to provide 24/7 security on the Property (July through December 2024). As an additional security measure beyond the installation of fencing and gates on the perimeter of the Property, two infrared cameras were installed on the active portion of the RFP mill facility to overlook the Property (see photo in Appendix A). The cameras were installed by RFP personnel between March 10 and 14, 2025, and their locations are indicated on Figure 2-1.

## 2.2 Perimeter Landscaping

In February and September, 2025, the RFP Resources Department planted landscape vegetation (ponderosa pine and incense cedar) along the western, southern, eastern, and a portion of the northern Property boundary. The perimeter vegetation is irrigated by a drip irrigation system and visually monitored by the RFP team.

On behalf of RFP, MFA submitted a request to DEQ on June 17, 2025, seeking approval to incorporate the existing vegetation on the soil berm located along the northern portion of the Property into the final landscaping and vegetation plan. DEQ conditionally approved the request on June 23, 2025. As part of the approval, DEQ requested that RFP complete the required landscaping in accordance with the Order and document the work performed—including any deviations, such as the inclusion of the vegetated soil berm—in a memorandum for DEQ review and approval. In response, MFA has prepared a memorandum, included as Appendix B of this report.

The location of planted landscape vegetation is shown on Figure 2-1, and a representative photo of the plantings is included in Appendix A.

## 2.3 Stormwater System Decommissioning

RFP decommissioned the existing stormwater system in accordance with the DEQ-approved *Stormwater Decommissioning Work Plan* (MFA 2024b) as described below.

### 2.3.1 Geophysical Surveys and Work Plan

In May 2022, MFA subcontracted a camera scope and geophysical surveyor to identify the locations of stormwater utility lines, catch basins, and potential discharge points (e.g., outfalls). A portion of the stormwater system was located in May 2022. An additional geophysical survey was conducted in December 2024 to further define the extent of the stormwater system and confirm earlier survey results. Utility features were approximately located using ground penetrating radar (GPR) (see photos in Appendix A). Subsurface anomalies identified with the GPR during the May 2022 and December 2024 surveys were evaluated using a magnetometer to confirm if the feature was metallic, or non-metallic.

### 2.3.2 Decommissioning

Based on geophysical surveys and visual observations conducted in May 2022 and December 2024, the extent of the remaining stormwater system was delineated.<sup>1</sup> Subsequently, the stormwater system was decommissioned by general contractor, Tom Willis, from February 12 through 14, 2025 as per the *Stormwater Decommissioning Work Plan*. The work was observed and documented by MFA field staff. Soil generated during the work was placed back into the excavations after stormwater features (piping runs, manholes/catch basins, etc.) were grouted in place (see photos in Appendix A). The locations of decommissioned stormwater features are shown on Figure 2-1.

## 2.4 Site Management Plan

On December 10, 2024, a final draft of the SMP for the Property was submitted electronically to the DEQ, and on December 20, 2024, DEQ approved the plan via email correspondence. The final SMP (MFA 2024c) fulfills requirements to specify material handling and health and safety requirements for contaminant-related activities on the Property, as outlined in the Order. The guidelines and procedures outlined the SMP are to be implemented during any work at the Property in which contaminated soil is disturbed or identified, or in which groundwater management is required. The SMP identified the Property's contamination information, contaminated media management procedures, and Property-wide controls.

Key provisions detailed in the SMP are as follows:

- Land use restrictions, including restrictions on working regularly on the Property.
- How the Property can be used and developed.
- Management of contaminated soil and groundwater at the Property.
- Worker health and safety.

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<sup>1</sup> It is acknowledged that if any utilities remain underneath the soil berm that they would not have been observable due to the size of the berm, though decommissioning of the observed portions of the stormwater system would have reduced the likelihood for offsite connection of any utilities under the berm, if any.



- Inspection and reporting.

## 2.5 Site Inspections

On December 9, 2025, Andrew Vidourek, RG, of MFA conducted an inspection of the Property per the procedures outlined in the SMP. The Property was observed to be in compliance with the guidelines of the SMP. Andrew Vidourek also inspected completed portions of the perimeter fencing. On February 12, 13, and 14, Gina Baragona of MFA conducted inspection of the completed fencing and completed portions of the perimeter landscaping. On September 30<sup>th</sup>, 2025, Bonny Nichols of RFP completed final inspection of the perimeter landscaping, providing additional photographic documentation to MFA.

## 2.6 Groundwater Use Restrictions

The EES was recorded with Jackson County, Oregon on September 30, 2025 (Appendix C). The EES describes the institutional and engineering controls required at the Property. The EES outlines the following required actions and restrictions (in addition to general right of entry for DEQ, release of restriction provisions, and general provisions):

- **Land Use Restrictions.** The following operations and uses are prohibited on the Property:
  - The Property or portions of the Property may not be developed for commercial, residential, or agricultural use without further investigation and/or cleanup under DEQ oversight and approval.
  - Regardless of the buildings on the Property, workers should not be present at the Property on a day-to-day basis to prevent exposure to elevated levels of contamination in the shallow soils.
- **Access Restrictions.** Owner must install and maintain a fence around the Property to restrict entry to the Property to reduce or limit human exposure to contaminated surface soil.
- **Site Management Plan.** Owner shall implement and adhere to the requirements prescribed in the DEQ approved Site Management Plan (“SMP”) dated December 10, 2024 and approved by DEQ.
- **Use of the Property.** Owner may not occupy or allow other parties to occupy the Property unless the controls listed in this Section 3 are maintained.

# References

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- DEQ. 2024a. State of Oregon Department of Environmental Quality in the Matter of Roseburg Forest Products Co. Order on Consent. DEQ No. 23-03 2024-009329. May 15.
- DEQ. 2024b. Donald E. Hanson, RG, Oregon Department of Environmental Quality. Extension Granted: Roseburg Forest Products PPA Consent Judgment - DEQ No. 23-03. Email to Gabrielle Thompson, Roseburg Forest Products Company. September 12.
- MFA. 2024a. Caitlin Bryan and Andrew Vidourek, RG, Maul Foster & Alongi, Inc. *Quarterly Progress Report for ECSI Site 537—Quarter 3, July to September, 2024*. Memorandum to Donald Hanson, RG, Oregon Department of Environmental Quality. October 10.
- MFA 2024b. *Stormwater System Decommissioning Work Plan, Tax Lots 500 and 600, North Central Avenue and Rossanley Drive, Medford, Oregon*. Prepared by Maul Foster & Alongi, Inc. for Roseburg Forest Products. July 23.
- MFA 2024c. *Site Management Plan, Tax Lots 500 and 600, North Central Avenue and Rossanley Drive, Medford, Oregon, ECSI Site Identification Number 537*. Prepared for Roseburg Forest Products. Maul Foster & Alongi, Inc.: Portland, OR. December 10.
- MFA. 2025a. Caitlin Bryan and Andrew Vidourek, RG, Maul Foster & Alongi, Inc. *Quarterly Progress Report for ECSI Site 537—Quarter 4, October to December, 2024*. Memorandum to Donald Hanson, RG, Oregon Department of Environmental Quality. January 13.
- MFA. 2025b. Caitlin Bryan and Andrew Vidourek, RG, Maul Foster & Alongi, Inc. *Quarterly Progress Report for ECSI Site 537—Quarter 1, January to March 2025*. Memorandum to Donald Hanson, RG, Oregon Department of Environmental Quality. April 11.
- MFA. 2025c. Caitlin Bryan and Andrew Vidourek, RG. *Maul Foster & Alongi, Inc. Vegetation Plan Request for ECSI Site 537 Memorandum to Don Hanson, Oregon Department of Environmental Quality*. September 5.

# Limitations

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The services undertaken in completing this 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.

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.

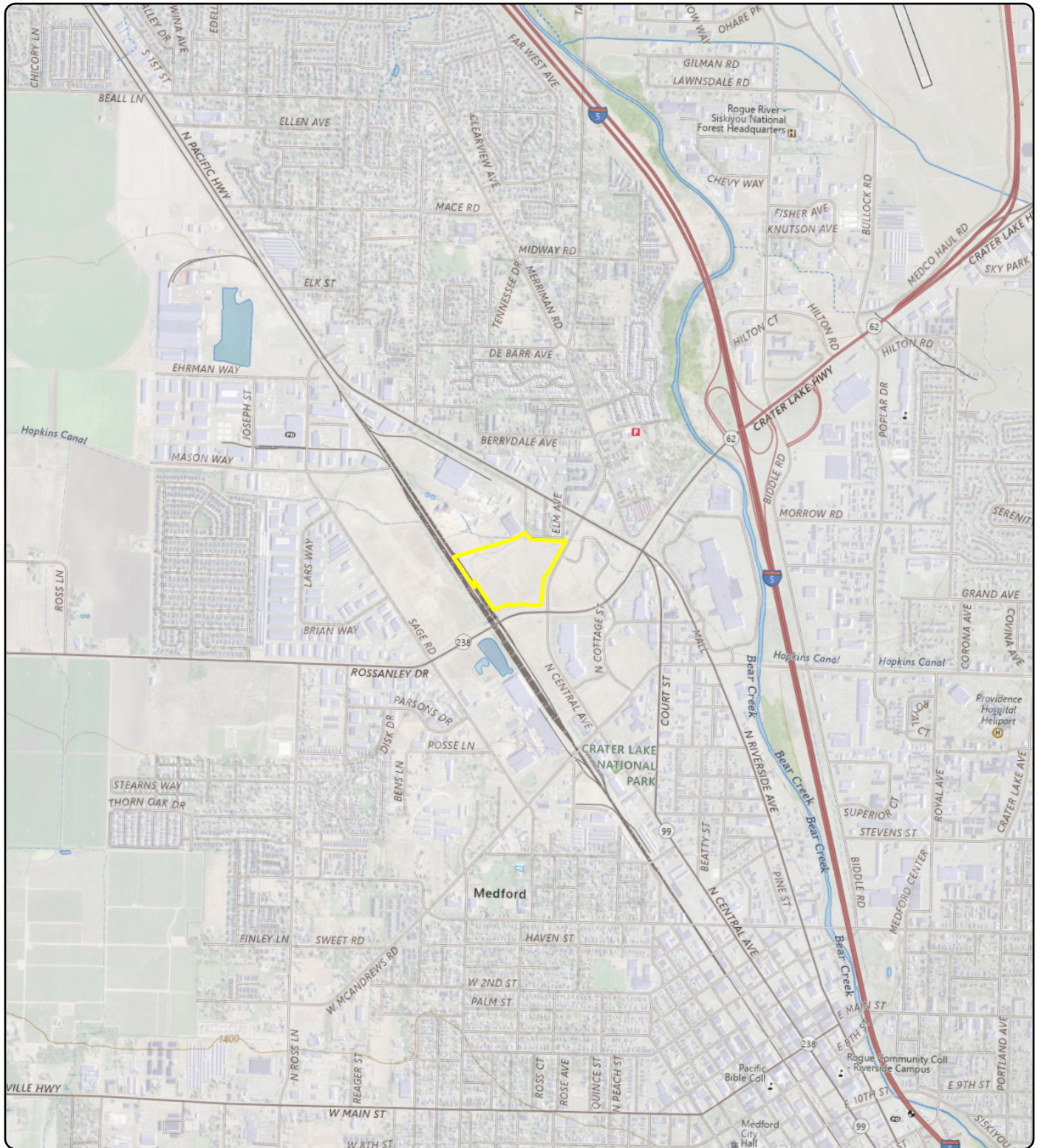
# Figures

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**Notes**  
U.S. Geological Survey (2021) 7.5-minute topographic quadrangle: Medford West; Township 37 south, range 2 west, sections 13 and 24;

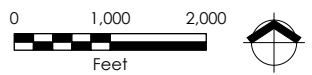
**Data Source**  
Property boundary obtained from Jackson County.

 **MAUL FOSTER ALONGI**  
p. 971 544 2139 | [www.maulfooster.com](http://www.maulfooster.com)

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**Legend**  
 Property Boundary

**Figure 1-1**  
**Property Location**  
Roseburg Forest Products  
Tax Lots 500 and 600  
North Central Avenue  
and Rossanley Drive  
Medford, OR





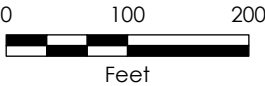


## Figure 1-2 Property Features

Roseburg Forest Products  
Tax Lots 500 and 600  
North Central Avenue  
and Rossanley Drive  
Medford, OR

### Legend

- Former Log Pond (approximate)
- Former refuse Burner (approximate)
- Former Truck Shop (approximate)
- Treated soil stockpile (approximate)
- Property Boundary



**Data Sources**  
Aerial photograph obtained from the U.S.  
Department of Agriculture.



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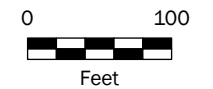
**Figure 2-1  
Completed  
Remedial Actions**  
Roseburg Forest Products  
Tax Lots 500 and 600  
North Central Avenue  
and Rossanley Drive  
Medford, OR

**Legend**

- IR Camera
- Outfall
- Water Pipe Vault
- 2025 Decommissioned Manhole/  
Catch Basin/Vault
- Metallic Utility Line (Potential Non-  
stormwater Water Line)
- City Sanitary Sewer
- Fire Water Line
- Previously Decommissioned  
Stormwater Line (Non-metallic)
- 2025 Decommissioned Stormwater  
Line (Non-metallic)
- Grass / Mowed Area
- Gravel Access Road
- Landscape Vegetation
- Paved Surface
- Vegetated Berm
- Perimeter Fencing
- Property Boundary

**Note**

All utility features are approximate.  
Utility features have been identified using ground  
penetrating radar and a magnetometer.  
Based on the geophysical survey, available  
documentation, employee knowledge, and visual  
observations, the extent of the stormwater system  
appears to be delineated, however, additional  
stormwater features may be present on the  
property.  
The line decommissioned in 2025 was done by filling  
portions of the line at each catch basin/vault/  
manhole.  
IR = infrared.



**Data Sources**

Aerial photograph obtained from the US Department of  
Agriculture; property boundary obtained from Jackson  
County.



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for legal, engineering, or surveying purposes. Users of this information should review or  
consult the primary data and information sources to ascertain the usability of the information.  
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# Appendix A

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## Photo Log



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# Photographs

Project Name: Roseburg Forest Products Medford Remedial Action  
Construction Summary Report

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and 372W24-500,  
Medford, Oregon

## Photo No. 1.

### Description

Fence constructed on the west property boundary, facing southeast. Photo date: December 9, 2024.



## Photo No. 2.

### Description

Fence with signage constructed on the north and east property boundaries, facing southwest. Photo date: December 9, 2024.



# Photographs

Project Name: Roseburg Forest Products Medford Remedial Action  
Construction Summary Report

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and 372W24-500,  
Medford, Oregon

## Photo No. 3.

### Description

Infrared camera  
installed near north  
property boundary.  
Photo date: April 2,  
2025.



## Photo No. 4.

### Description

Planted trees near  
northeast corner of the  
property, facing east.  
Photo date: April 2,  
2025.





# Photographs

Project Name: Roseburg Forest Products Medford Remedial Action  
Construction Summary Report

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and 372W24-500,  
Medford, Oregon

## Photo No. 5.

### Description

View of example tree  
planting near the  
northwest corner of the  
property. Photo date:  
September 30, 2025.



## Photo No. 6.

### Description

Stormwater pipe  
discharge location to  
Hopkins Canal on the  
northeast portion of the  
property, facing south,  
prior to stormwater  
system  
decommissioning.  
Photo date: December  
9, 2025.





# Photographs

Project Name: Roseburg Forest Products Medford Remedial Action  
Construction Summary Report

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and 372W24-500,  
Medford, Oregon

## Photo No. 7.

### Description

Contractor decommissioning former stormwater system vault, facing northwest. Photo date: February 12, 2025.



## Photo No. 8.

### Description

Contractor decommissioning former stormwater system line, facing west. Photo date: February 13, 2025.



## Appendix B

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### 2025 Vegetation Plan Request Memorandum



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# Memorandum

To: Oregon Department of Environmental Quality      Date: September 5, 2025  
Donald Hanson, RG

From: Caitlin Bryan and Andrew Vidourek, RG      Project No.: M1419.14.007

Re: Vegetation Plan Request for ECSI Site 537

---

Maul Foster & Alongi, Inc. (MFA) has prepared this memorandum on behalf of Roseburg Forest Products (RFP) to request approval from the Oregon Department of Environmental Quality (DEQ) for the proposed vegetation plan (see attached Figure) for ECSI Site 537, tax lots 372W24-600 and 372W24-500, located northwest of the intersection of North Central Avenue and Rossanley Drive in Medford, Oregon (the Property).

Per the requirements of the Remedial Action Scope of Work described in the Order on Consent dated May 15, 2024, RFP is required to install landscaping around the perimeter of the Property to limit windblown transport of contaminated surface soils.

## Vegetation Plan

### Completed Landscaping

From February 19 to 21, 2025, the RFP Resources Department planted landscape vegetation along the west, south, and east Property boundaries. The location of planted landscape vegetation is shown with green shading on the Figure, and a representative photograph is shown in the attached Photo Log (Photo No. 9).

### Site Security

As an additional security measure, two infrared cameras were installed on the active portion of the RFP mill facility to overlook the Property. The cameras were installed by RFP personnel between March 10 and 14, 2025, and their locations are indicated on the attached Figure.

### Existing Property Features

Because infrared cameras have been installed, planting trees along the north Property boundary is not feasible, as they would obstruct the cameras' view. Therefore, RFP requests approval to use existing features on the Property as part of the vegetation plan. The following are located on the north portion of the Property:

- Pavement is present at two locations, at the northeast Property entrance, and the north central portion of the Property (yellow areas on the Figure and Photo No. 1, 4, and 5).

- A gravel access road parallels the north Property boundary. The road is routinely maintained (graveled and graded) for emergency and fire prevention purposes (blue area on the Figure and Photo No. 2 and 3).
- Vegetated berm on the north portion of the Property is covered with grass, shrubs, and small trees (orange area on the Figure and Photo No. 4, 6, 7, and 8).
- Grass near the north Property boundary is present and is routinely maintained/mowed (purple area on the Figure and Photo No. 8).

All these features reduce the potential for transportation of windblown surface soils and are therefore an acceptable alternative to planting new, landscape vegetation (e.g., trees).

### **Remaining Landscaping**

There are two areas remaining that will require landscaping located on the northeast and northwest portions of the north Property boundary (see red areas on the Figure). These areas will have trees planted similarly to the landscaping completed on the west, south, and east Property boundaries (see Photo No. 9). Due to the likelihood of trees planted in the summer months of dying, RFP plans to plant trees on these two portions of the Property in September 2025.

## **Summary**

RFP requests DEQ approval of this vegetation plan. If approved, RFP will include this memorandum as an attachment to the forthcoming construction summary report.

## **Attachments**

Limitations

Figure

Attachment—Photographs

## Limitations

The services undertaken in completing this memorandum 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 memorandum 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.

Opinions and recommendations contained in this memorandum 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 memorandum.



# Figure

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Project: M1419-14.007 Produced By: sturner Reviewed By: avidourek Print Date: 8/18/2025 Path: X:\1419\_14\07\_Pro\M1419-14\_007\_002.aprx\Fig Vegetation Plan Request



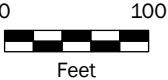
# Figure Vegetation Plan Request

Tax Lots 372W24-600  
and 372W24-500  
Medford, OR

## Legend

- IR Camera
- Landscape Vegetation
- Grass / Mowed Area
- Gravel Access Road
- Landscape Vegetation to be Planted September, 2025
- Paved Surface
- Vegetated Berm
- Property Boundary

**Note**  
IR = infrared.



**Data Sources**  
Aerial photograph (2024) obtained from the Oregon  
Statewide Imagery Program; property boundary obtained  
from Jackson County.



This product is for informational purposes and may not have been prepared for, or be suitable  
for legal, engineering, or surveying purposes. Users of this information should review or  
consult the primary data and information sources to ascertain the usability of the information.  
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# Attachment

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## Photographs



MAUL  
FOSTER  
ALONGI



# Photographs

Project Name: Roseburg Forest Products—Vegetation  
Plan Request

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and  
372W24-500, Medford, Oregon

Date: December 2024 through July 2025

## Photo No. 1.

### Description

Paved property  
entrance, facing  
west/southwest.



## Photo No. 2.

### Description

Vegetated berm and  
gravel access road from  
the paved property  
entrance shown in Photo  
No. 1, facing west.







# Photographs

Project Name: Roseburg Forest Products—Vegetation  
Plan Request

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and  
372W24-500, Medford, Oregon

Date: December 2024 through July 2025

## Photo No. 3.

### Description

Graveled access road  
(continued from Photo  
No. 2) between the  
north property boundary  
and the vegetated berm,  
facing west/southwest.



## Photo No. 4.

### Description

Paved area between the  
north property boundary  
and the vegetated soil  
berm, west of the gravel  
access road shown in  
Photo No. 3. Photo  
facing south/southwest.







# Photographs

Project Name: Roseburg Forest Products—Vegetation  
Plan Request

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and  
372W24-500, Medford, Oregon

Date: December 2024 through July 2025

## Photo No. 5.

### Description

Paved area between the  
north property boundary  
and the vegetated soil  
berm. Photo facing west.



## Photo No. 6.

### Description

South side of the  
vegetated berm, facing  
east/northeast.







# Photographs

Project Name: Roseburg Forest Products—Vegetation  
Plan Request

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and  
372W24-500, Medford, Oregon

Date: December 2024 through July 2025

## Photo No. 7.

### Description

South side of the  
vegetated berm, facing  
west/northwest.



## Photo No. 8.

### Description

Grass area between the  
north property boundary  
and the vegetated berm  
(see purple area on the  
Figure). Photo facing  
east.





# Photographs

**Project Name:** Roseburg Forest Products—Vegetation Plan Request

**Project Number:** M1419.14.007

**Location:** ECSI Site 537, tax lots 372W24-600 and 372W24-500, Medford, Oregon

**Date:** December 2024 through July 2025

## **Photo No. 9.**

### **Description**

Vegetation (trees) planted along the northeast property fence line in spring 2025. Remaining areas shown in red on the attached Figure to receive similar planting in September, 2025.





## Appendix C

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### Easement and Equitable Servitudes



MAUL  
FOSTER  
ALONGI

Jackson County Official Records	<b>2025-021032</b>
R-E	<b>09/30/2025 12:41:01 PM</b>
Stn=4 SIMPSOHP	
\$45.00 \$10.00 \$13.00 \$13.00 \$11.00	<b>\$156.00</b>
\$60.00 \$4.00	
I, Christine Walker, County Clerk for Jackson County, Oregon, certify that the instrument identified herein was recorded in the Clerk records.	
Christine Walker - County Clerk	

Space above this line for Recorder's use.

After recording, return to:

**Grantee**

Oregon DEQ  
165 E. 7<sup>th</sup> Avenue, Suite 100  
Eugene, OR 97401  
Attention: Don Hanson

**Grantor**

Roseburg Forest Products Co.  
3660 Gateway Street  
Springfield, OR 97477

**EASEMENT AND EQUITABLE SERVITUDES**

This grant of Easement and acceptance of Equitable Servitudes ("**EES**") is made on September 29 2025, between Roseburg Forest Products Co., an Oregon corporation ("**Grantor**") and the State of Oregon, acting by and through the Oregon Department of Environmental Quality ("**DEQ**" or "**Grantee**").

**RECITALS**

A. Grantor is the owner of certain real property located in Medford, in Jackson County, Oregon, Tax Map 372W24, Tax Lot 500 and 600 (the "**Property**") the location of which is more particularly described in Exhibit A to this EES. The Property is a portion of the site referenced under the name Medford Corp.- North Medford, Cleanup Site ID No. 0537, in the files of DEQ's Environmental Cleanup Program at Western Region office located at 165 E. 7<sup>th</sup> Avenue, Suite 100, Eugene, Oregon, and telephone 541-686-7838. Information about the Property can be found online at DEQ's electronic data management system, at <https://ordeq.org/ECSI0537>.

B. On May 8, 2024, the Director of DEQ entered into a Consent Order for a prospective purchaser agreement with Grantor. The remedial action prescribed in the Consent Order requires, among other things, site and land use restrictions on the Property, restrictions on groundwater use, and development and implementation of a Site Management Plan.

C. This EES is intended to further the implementation of the selected remedial action and protect human health and the environment.

D. Nothing in this EES constitutes an admission by Grantor of any liability for the contamination described in this EES.

**581028041**  
**AmeriTitle** WAS REQUESTED TO  
RECORD THIS INSTRUMENT AS  
AN ACCOMMODATION. IT HAS NOT  
BEEN EXAMINED FOR SUFFICIENCY  
OR ITS EFFECT UPON THE TITLE.

## **1. DEFINITIONS**

- 1.1 "DEQ" means the Oregon Department of Environmental Quality, and its employees, agents, and authorized representatives. "DEQ" also means any successor or assign of DEQ under the laws of Oregon, including but not limited to any entity or instrumentality of the State of Oregon authorized to perform any of the functions or to exercise any of the powers currently performed or exercised by DEQ.
- 1.2 "Ecological receptor" has the meaning set forth in OAR 340-122-0115.
- 1.3 "Hazardous substance" has the meaning set forth in ORS 465.200
- 1.4 "Owner" means any person or entity, including Grantor, who at any time owns, occupies, or acquires any right, title, or interest in or to any portion of the Property or a vendee's interest of record to any portion of the Property, including any successor, heir, assign or holder of title or a vendee's interest of record to any portion of the Property, but excluding any entity or person who holds such interest solely for the security for the payment of an obligation and does not possess or control use of the Property.
- 1.5 "Remedial Action" has the meaning set forth in ORS 465.200 and OAR 340-122-0115.

## **2. GENERAL DECLARATION**

2.1 Grantor, in consideration of Grantee's approval of the Consent Order scope of work elements described above, grants to DEQ an Easement for access and accepts the Equitable Servitudes described in this instrument and, in so doing, declares that the Property is now subject to and must in the future be conveyed, transferred, leased, encumbered, occupied, built upon, or otherwise used or improved, in whole or in part, subject to this EES.

2.2 Each condition and restriction set forth in this EES touches and concerns the Property and the equitable servitudes granted in Section 3 and easement granted in Section 4 below, runs with the land for all purposes, is binding upon all current and future owners of the Property as set forth in this EES, and inures to the benefit of the State of Oregon. Grantor further conveys to DEQ the perpetual right to enforce the conditions and restrictions set forth in this EES.

## **3. EQUITABLE SERVITUDES (REQUIRED ACTIONS AND RESTRICTIONS ON USE)**

3.1. **Land Use Restrictions.** The following operations and uses are prohibited on the Property:

- a. The Property or portions of the Property may not be developed for commercial, residential, or agricultural use without further investigation and/or cleanup under DEQ oversight and approval.

- b. Regardless of the buildings on the Property, workers should not be present at the Property on a day-to-day basis to prevent exposure to elevated levels of contamination in the shallow soils.

3.2. **Access Restrictions.** Owner must install and maintain a fence around the Property to restrict entry to the Property to reduce or limit human exposure to contaminated surface soil.

3.3. **Site Management Plan.** Owner shall implement and adhere to the requirements prescribed in the DEQ approved Site Management Plan (“**SMP**”) dated December 10, 2024 and approved by DEQ.

3.4. **Use of the Property.** Owner may not occupy or allow other parties to occupy the Property unless the controls listed in this Section 3 are maintained.

#### **4. EASEMENT (RIGHT OF ENTRY)**

During reasonable hours and subject to reasonable security requirements, DEQ may enter upon and inspect any portion of the Property to determine whether the requirements of this EES have been or are being complied with. Except when necessary to address an imminent threat to human health or the environment, DEQ will use its best efforts to notify the Owner 72 hours before DEQ entry to the Property. DEQ may enter upon the Property at any time to abate, mitigate, or cure at the expense of the Owner the violation of any condition or restriction contained in this EES, provided DEQ first gives written notice of the violation to Owner describing what is necessary to correct the violation and Owner fails to cure the violation within the time specified in such notice. Any such entry by DEQ to evaluate compliance or to abate, mitigate, or cure a violation may not be deemed a trespass.

#### **5. RELEASE OF RESTRICTIONS**

5.1. Owner may request release of any or all of the conditions or restrictions contained in this EES by submitting such request to the DEQ in writing with evidence that the conditions or restrictions are no longer necessary to protect human health and the environment. The decision to release any or all of the conditions or restrictions in this EES will be within the sole discretion of DEQ.

5.2. Upon a determination pursuant to Subsection 5.1, DEQ will, as appropriate, execute and deliver to Owner a release of specific conditions or restrictions, or a release of this EES in its entirety.

#### **6. GENERAL PROVISIONS**

6.1. **Notice of Transfer/Change of Use.** Owner must notify DEQ within 10 days after the effective date of any conveyance, grant, gift, or other transfer, in whole or in part, of Owner's interest in or occupancy of the Property. Such notice must include the full name and address of the Party to whom Owner has transferred an interest or right of occupancy. In addition, Owner must notify DEQ a minimum of 10 days before the effective date of any change in use of the Property

that might expose human or ecological receptors to hazardous substances. Such notice must include complete details of any planned development activities or change in use. Notwithstanding the foregoing, Owner may not commence any development inconsistent with the conditions or restrictions in Section 3 without prior written approval from DEQ as provided in Subsection 3 of this EES or removal of the condition or restriction as provided in Subsection 5.1. This subsection does not apply to the grant or conveyance of a security interest in the Property.

6.2. **Zoning Changes.** Owner must notify DEQ no less than 30 days before Owner's petitioning for or filing of any document initiating a rezoning of the Property that would change the base zone of the Property under the Jackson County zoning code or any successor code. As of the date of this EES, the base zone of the Property is Medford-Light Industrial (I-L, tax lot 500) and Medford-General Industrial (I-G, tax lot 600).

6.3. **Cost Recovery.** Owner will pay DEQ's costs for review and oversight of implementation of and compliance with the provisions in this EES, including but not limited to periodic review and tracking of actions required by this EES. This EES constitutes the binding agreement by the Owner to reimburse DEQ for all such eligible review and oversight costs. DEQ will establish a cost recovery account for tracking and invoicing DEQ project costs. DEQ will provide the Owner with a monthly statement and direct labor summary. DEQ costs will include direct and indirect costs. Direct costs include site-specific expenses and legal costs. Indirect costs are those general management and support costs of the State of Oregon and DEQ allocable to DEQ oversight of this EES and not charged as direct site-specific costs. Indirect charges are based on actual costs and are applied as a percentage of direct personal services costs.

6.4. **Inspection and Reporting.** Owner will immediately notify DEQ of any condition or occurrence at the Property that does not conform with provisions of this EES. In addition, Owner will maintain records documenting inspection and reporting as outlined in the DEQ approved Site Management Plan. Owner will submit inspector records to DEQ within 30 days of receipt of a written request from DEQ of its periodic review of compliance with this EES. Reports provided to DEQ in response to this notification must include sufficient detail to allow DEQ to determine compliance with EES requirements, and include a photographic log that supports the report's narrative.

6.5. **Reference in Deed.** A reference to this EES, including its location in the public records, must be recited in any deed conveying the Property or any portion of the Property. Each condition and restriction contained in this EES runs with the land so burdened until such time as the condition or restriction is removed by written certification from DEQ, recorded in the deed records of the County in which the Property is located, certifying that the condition or restriction is no longer required to protect human health or the environment.

6.6. **Effect of Recording.** Upon the recording of this EES, all future Owners are conclusively deemed to have consented and agreed to every condition and restriction contained in this EES, whether or not any reference to this EES is contained in an instrument by which such person or entity occupies or acquires an interest in the Property.

6.7. **Enforcement and Remedies.** Upon any violation of any condition or restriction contained in this EES, the State of Oregon, in addition to the remedies described in Section 4, may

enforce this EES as provided in the Consent Order or seek available legal or equitable remedies to enforce this EES, including civil penalties as set forth in ORS 465.900.

6.8. IN WITNESS WHEREOF Grantor and Grantee have executed this Easement and Equitable Servitude as of the date and year first set forth above

*[signatures and acknowledgements appear on following page(s)]*



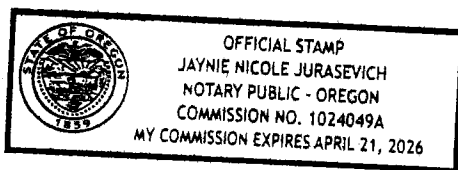
BY SIGNATURE BELOW, THE STATE OF OREGON APPROVES AND ACCEPTS THIS  
CONVEYANCE PURSUANT TO ORS 93.808.


**GRANTOR:** Roseburg Forest Products Co., an Oregon corporation

By:  Date: 9/17/2025  
Matthew Lawless, General Counsel

STATE OF OREGON            )  
  ) ss.  
County of Lane             )

The foregoing instrument is acknowledged before me this 17<sup>th</sup> day of  
September, 2025, by Matthew Lawless, General Counsel of Roseburg Forest Products Co., an  
Oregon corporation, on its behalf.



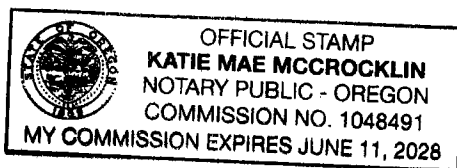
  
NOTARY PUBLIC FOR OREGON  
My commission expires: April 21, 2026

GRANTEE: State of Oregon, Department of Environmental Quality

By: Mary Camarata Date: 9-29-25  
Mary Camarata, Western Region Cleanup and Emergency Response Manager (Acting)

STATE OF OREGON )  
County of Jackson ) ss.

The foregoing instrument is acknowledged before me this 29<sup>th</sup> day of September, 2025, by Mary Camarata of the Oregon Department of Environmental Quality, on its behalf.



[Signature]  
NOTARY PUBLIC FOR OREGON  
My commission expires: June 11, 2028

## EXHIBIT A

### Legal Description of Property

**TRACT A:** Commencing at the southwest corner of Donation Land Claim (DLC) No. 60 in Township 37 South, Range 2 West, Willamette Meridian, in Jackson County, Oregon; thence along the south boundary of said DLC No. 60, South 89°59'48" East 764.72 feet to the True Point of Beginning; thence continue along said south boundary, South 89°59'48" East 517.65 feet to the westerly right of way line of that land acquired for the State of Oregon by and through its Department of Transportation by Circuit Court Final Judgment, Case No. 994180E2; thence along said westerly right of way, South 27°17'01" West 483.39 feet; thence South 36°41'52" West 141.17 feet; thence South 02°54'38" West 381.74 feet; thence South 40°52'20" West 34.75 feet; thence North 88°31'53" West 302.82 feet; thence South 77°26'32" West 96.40 feet; thence, leaving said State of Oregon right of way, North 12°33'28" West 68.02 feet to the southeast corner of that tract of land described in No. 99-21518, Official Records; thence along the easterly boundary of said tract, North 15°05'50" East 929.24 feet to the True Point of Beginning.

(Code 49-01, Account #1-042914-3, Map #372W24, Tax Lot #500)

**TRACT B:** Commencing at the southwest corner of Donation Land Claim (DLC) No. 60 in Township 37 South, Range 2 West, Willamette Meridian, in Jackson County, Oregon; thence along the south line of said DLC No. 60, South 89°59'48" East 764.72 feet to the northeast corner of that tract of land described in No. 99-21518, Official Records for the True Point of Beginning; thence along the easterly boundary of said tract, South 15°05'50" West 929.24 feet to the southeast corner thereof; thence South 12°33'28" East 68.02 feet to the northerly right of way line of that tract of land acquired by the State of Oregon, by and through its Department of Transportation by Circuit Court Final Judgment, Case No. 994180E2; thence along said right of way line, South 77°26'32" West 87.66 feet; thence South 65°09'13" West 162.23 feet; thence South 51°20'56" West 4.54 feet to the easterly right of way line of the Central Oregon and Pacific Railroad Company; thence leaving said State of Oregon right of way and along the railroad right of way, North 35°08'29" West 524.83 feet; thence South 00°23'36" East 120.82 feet; thence North 35°15'10" West 540.38 feet to the most westerly corner of that tract of land described in No. 98-41740, Official Records; thence along the northerly boundary of said tract, North 71°51'56" East 889.01 feet (record North 71°52'33" East 889.08 feet) to a 5/8" iron pin; thence North 57°20'50" East 187.63 feet (record North 57°18'23" East 187.56 feet) to the westerly right of way line of Lynn Road; thence along said right of way line, South 44°58'35" East 104.55 feet to the point of beginning.

(Code 49-01, Account #1-038559-1, Map #372W24, Tax Lot #600)

# EXHIBIT B

## SITE MAP

