



November 2, 2017

City of Detroit Department of Public Works
City Engineering & Street Maintenance Divisions
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 611
Detroit, Michigan 48226

Re: Notice of Migration of Contamination
From 537, 541, 551, 557, 561, 567, 577, 585, 593, 599 S. Post Street, Detroit, MI, Tax ID 18008628-37
(MDOT Parcels 5145, 5146, 5232, 5233)
Potentially toward S. Post Street right-of-way to the west and/or alley right-of-way to the east
Notification No. 5145.5146.5232.5233-ROW

To whom it may concern:

The Mannik Smith Group, Inc. ("MSG"), on behalf of the Michigan Department of Transportation ("MDOT"), has directed or conducted underground environmental testing at 537, 541, 551, 557, 561, 567, 577, 585, 593, 599 S. Post Street, Detroit, Michigan ("the Site") in relation to the Gordie Howe International Bridge project underway in the vicinity of the right-of-ways referenced above ("the subject properties").

The Michigan Department of Environmental Quality ("MDEQ") requires distribution of the enclosed a Notice of Migration of Contamination form when there is evidence that environmental contamination at one property has or may have affected nearby properties. Hazardous substance(s) were identified in soil and/or groundwater sample(s) collected at the Site at concentration(s) that exceed Generic Residential Cleanup Criteria and Screening Levels established by the MDEQ.

At this time, it is not known if the subject properties have been affected by the environmental contamination at the Site. Also, the identification of hazardous substance(s) at the Site does not necessarily mean a hazardous situation or immediate danger currently exists. MSG, on behalf of the MDOT, is providing this notice to you as a precautionary measure and for your general awareness of environmental conditions at the Site.

Please review the enclosed document and if you have any questions regarding the Notice of Migration of Contamination please contact Karen Williams of the MDEQ at 586-753-3884. If you have general questions regarding the contents of this letter please contact Walter Bolt of MSG at 734-397-3100, extension 6025 or Jim Woodruff of the MDOT at 517-241-9115.

Sincerely,

Walter J. Bolt, CPG
Project Manager
Environmental Owners Representative Consultant
Gordie Howe International Bridge Project

CC: Jim Woodruff – MDOT
Karen Williams – MDEQ RRD Project Manager
Paul Max – General Manager, Environmental Affairs, City of Detroit BSEED
Anita Harrington – Environmental Specialist II, City of Detroit BSEED

TECHNICAL SKILL.
CREATIVE SPIRIT.

5145.5146.5232.5233.Notice Cover Letter.DetroitDPW.docx

2365 Haggerty Road South, Canton, Michigan 48188 Tel: 734.397.3100 Fax: 734.397.3131 www.MannikSmithGroup.com

RECEIVED NOV - 9 2017



| |
|--|
| For DEQ Use Only ITS # _____ Site ID # _____ Category Code: _____ |
|--|

NOTICE OF MIGRATION OF CONTAMINATION (FORM EQP4482 REV. 4/16)

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL324.20107a, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.51017(1) and MCL 324.20114(1)(b)(ii) & (iii) to notify the Michigan Department of Environmental Quality (DEQ) and affected property owners. Submission of this notice does not fulfill the notification requirements of MCL 324.21309a.

The notice must be provided within 45 days (MCL 324.20107a) or within 30 days (MCL 324.20114) after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 for exceptions that apply to parties subject to MCL 324.20107a).

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114(1)(b)(ii) & (iii). This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/deqducare, or by calling the Remediation and Redevelopment Division's Lansing office at 517-284-5187. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 299.51017(1) or MCL 324.20114(1)(b)(ii) & (iii) are available at www.michigan.gov/deqducare.

THIS NOTICE IS PROVIDED PURSUANT TO: R 299.51017 MCL 324.20114(1)
(check both, if applicable)

Please provide the following information as completely as possible.

- | | |
|--|--|
| 1. Name and location of the property that hazardous substances are emanating from: | 2. Status relative to the property: (Check one or both, as applicable.) |
|--|--|

| | |
|---|---|
| Name: MI Dept. of Transportation (MDOT) Parcels 5145, 5146, 5232, 5233 | Owner <input checked="" type="checkbox"/> |
| Address: 537, 541, 551, 557, 561, 567, 577, 585, 593, 599 S. Post St. | Operator <input type="checkbox"/> |
| Location: Michigan | |
| City/County: Detroit/Wayne | |
| Property Tax Identification Number, or if applicable, the ward and item number: 18008628-37 | |

Latitude (decimal degrees): 42.297920 N Longitude (decimal degrees): -83.106942 W

Reference Point for Latitude and Longitude:
Center of Site: Main/front door: Front gate/main entrance: Other:

Collection Method: Survey: Interpolation: GPS:



2. Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

GHIB MDOT Parcels 5145, 5146, 5232, & 5233; MERA Site ID# 82002800; CNTS-RRD-16-001

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:

Name: MDOT Bureau of Development, Environmental Services Section

Address: 425 W. Ottawa Street, P.O. Box 30050

City/State: Lansing, MI, 48909

Telephone Number: 517-241-9115

4. Name, address and telephone number of a contact person familiar with the content of the notice:

Name: Walter Bolt of The Mannik & Smith Group, Inc. Environmental Owner's Rep Consultant to MDOT

Address: 2365 Haggerty Rd South

City/State: Canton, MI 48188

Telephone Number: 734-397-3100 x. 6025

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the adjacent property(s) onto which contamination is migrating, has migrated, or is likely to migrate.

If this Notice is provided pursuant to MCL Section 324.20114(1), provide the address and other location information for each property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (e.g., a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Contaminated Site Specialist, Environmental Services Section, MDOT-Bureau of Development, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48909. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.).

Address: 605 S. Post St. Notified? No Yes Date: November 2, 2017
 City/State: Detroit, MI
 Property Tax ID number: 18008622-7
 Other: Detroit Produce Terminal, Attn: Samuel J. Serra, 7201 W. Fort Street, Detroit, MI, 48209

Address: 537 S. Post St. Notified? No Yes Date: November 2, 2017
 City/State: Detroit, MI
 Property Tax ID number: 18008637
 Other: MDOT Parcel 5234

Address: 2 Woodward Avenue, Ste. 611 Notified? No Yes Date: November 2, 2017
 City/State: Detroit, MI, 48226
 Property Tax ID number: NA
 Other: City of Detroit (S. Post Street and alley adjoining 537, 541, 551, 557, 561, 567, 577, 585, 593, & 599 S. Post St./18008628-37)

Address: 735 Randolph Notified? No Yes Date: November 2, 2017
 City/State: Detroit, MI, 48226
 Property Tax ID number: NA
 Other: Detroit Water & Sewerage Department (utility holder)

Address: One Energy Plaza, Ste. 1935 Notified? No Yes Date: November 2, 2017
 City/State: Detroit, MI, 48226
 Property Tax ID number: NA
 Other: Detroit Edison, DTE (utility holder)



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIATION AND REDEVELOPMENT DIVISION

Address: 27175 Energy Way
City/State: Novi, MI, 48377
Property Tax ID number: NA
Other: International Transmission Company (ITC)
(utility holder)

Notified? No Yes Date: November 2, 2017

Address: 735 Randolph Street, Ste. 1900
City/State: Detroit, MI, 48226
Property Tax ID number: NA
Other: Great Lakes Water Authority (utility holder)

Notified? No Yes Date: November 2, 2017

Address: 12775 Lydon Street
City/State: Detroit, MI, 48227
Property Tax ID number: NA
Other: Comcast/Xfinity (utility holder)

Notified? No Yes Date: November 2, 2017

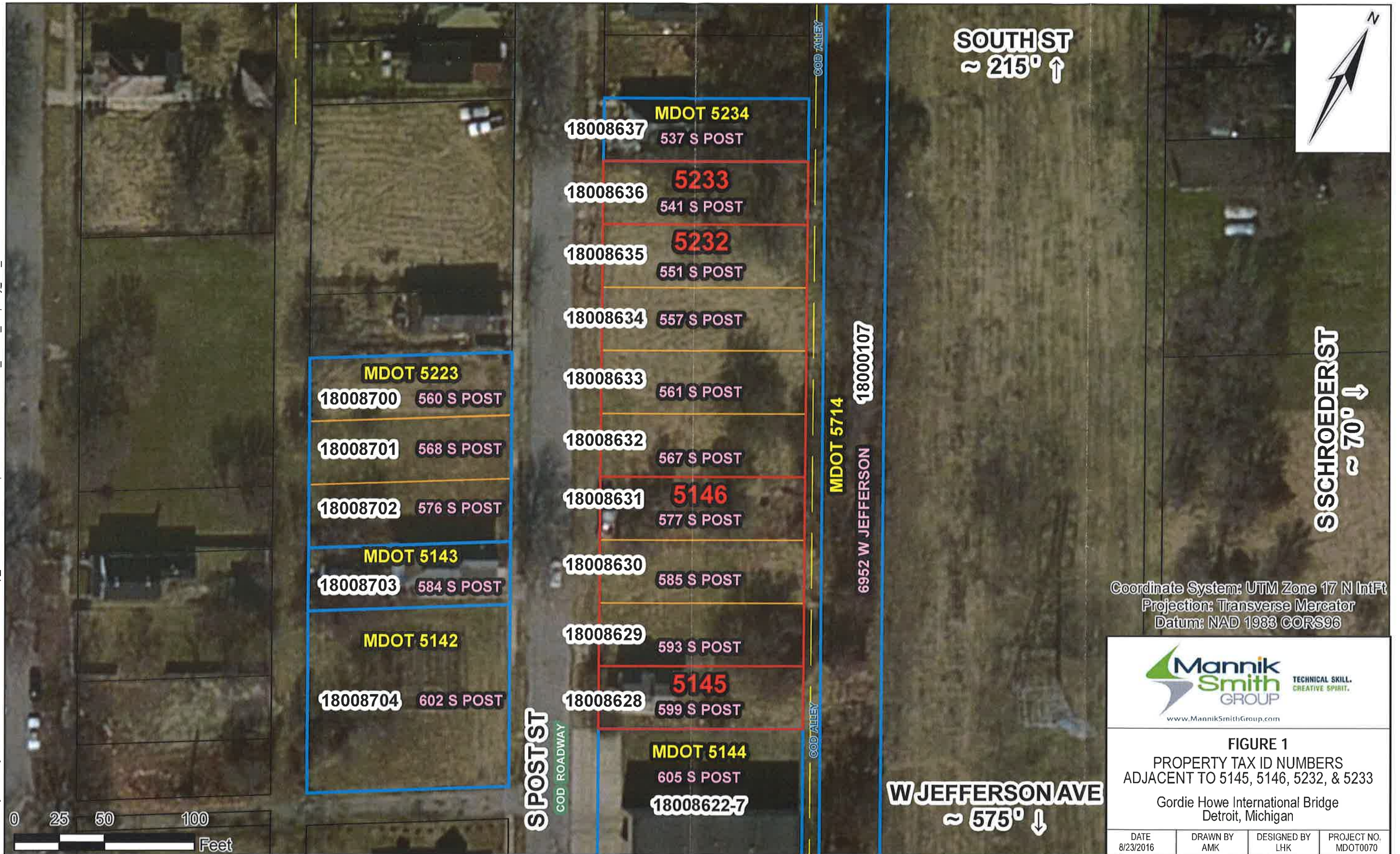
Address: 208 S. Akard Street
City/State: Dallas, TX, 75202
Property Tax ID number: NA
Other: AT&T Headquarters (utility holder)

Notified? No Yes Date: November 2, 2017

(Attach additional pages as needed) **PLEASE SEE ATTACHED MAP OF PROPERTY TAX ID NUMBERS.**

MAP OF PROPERTY TAX ID NUMBERS

Date Saved: 8/23/2016 5:14:32 PM
Path: S:\Projects\Project K-OMDOT0070\ENGAPP\GIS\Map_Files\Notification Maps\5145.5146.5233.5232_Offsite_Property_Tax_ID.mxd





6. Complete the Table on Page 6 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 6, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 6, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to MCL 324.20114(1).
7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds the generic residential criteria developed by the DEQ pursuant to MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.
8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here:

NA

YES NO

9. Is this notice being submitted within the timeframes established under R 299.51017 and/or MCL 324.20114(1), as applicable?
10. Is this notice in addition to a notice that was submitted prior to *December 21, 2002*? (R 299.51017(4)(c))
11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #:
12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors *must* receive this notice.)
13. Has surface water been affected (R 299.51017(1))? (If yes, please identify the affected surface water body.)

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to \$25,000 for each violation.

Signature Walter Bolt
(Owner or person legally authorized to bind the person making this report)

Date 11/2/2017

Name (Typed or Printed) Walter G. Bolt

Title (Typed or Printed) Project Manager, Environmental Owners Representative Consultant, Gordie Howe International Bridge Project



See Item 6 on Page 5 of this Form for instructions to be used in completing this table. Attach additional pages if necessary. The information to be included in each column of the table is:

- Column A Name of hazardous substance.
- Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
- Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
- Column D Sample location for Column C (relate to label on map).
- Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
- Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
- Column G Direction of contaminant migration, if known.
- Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column H to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
- Column I Sample location for Column H (relate to label on map).
- Column J Environmental medium for measurement reported in Column H, if applicable.

PLEASE SEE ATTACHED TABLE 1

| A Hazardous Substance | B CAS Number | C Maximum Concentration | D Sample Location for "C" | E Environmental Medium for "C" | F Distance to Property Boundary | G Direction of Migration | H Boundary Concentration | I Sample Location for "H" | J Environmental Medium for "H" |
|--------------------------|-----------------|----------------------------|------------------------------|-----------------------------------|------------------------------------|-----------------------------|-----------------------------|------------------------------|-----------------------------------|
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| | | | | | | | | | |

Total Number Samples Collected: _____ Total Number of Samples Exceeding Criteria: _____

**A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice
PLEASE SEE ATTACHED FIGURE 2**

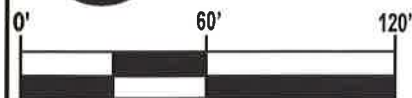
TABLE 1

DEQ NOTICE OF MIGRATION ATTACHMENT

| A | B | C | D | E | F | G | H | I | J |
|---------------------------|------------|-----------------------|-----------------------------------|------------------------------|-------------------------------|------------------------|------------------------|-------------------------|------------------------------|
| Hazardous Substance | CAS Number | Maximum Concentration | Sample Location for "C" | Environmental Medium for "C" | Distance to Property Boundary | Direction of Migration | Boundary Concentration | Sample Location for "H" | Environmental Medium for "H" |
| Benzene | 71-43-2 | 730 | 5146_SB08_3-3.5_S_SME_20151118 | Soil | 5' | Unknown | - | - | - |
| Acenaphthene | 83-32-9 | 42,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Anthracene | 120-12-7 | 61,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Benzo(a)anthracene | 56-55-3 | 85,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Benzo(a)pyrene | 50-32-8 | 73,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Benzo(b)fluoranthene | 205-99-2 | 89,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Dibenzo(a,h)anthracene | 53-70-3 | 13,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Fluoranthene | 206-44-0 | 200,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Fluorene | 86-73-7 | 37,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Indeno(1,2,3-cd)pyrene | 193-39-5 | 61,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| 2-Methylnaphthalene | 91-57-6 | 18,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Naphthalene | 91-20-3 | 54,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Phenanthrene | 85-01-8 | 250,000 | 5146_SB05_0.5-1_S_SME_20151118 | Soil | 35' | Unknown | - | - | - |
| Arsenic | 7440-38-2 | 100,000 | 5232_SB-08_5-6_S_SME_20151117 | Soil | 15' | Unknown | - | - | - |
| Lead | 7439-92-1 | 1,500,000 | 5232_SB-04_0.5-1_S_SME_20151117 | Soil | 40' | Unknown | - | - | - |
| Lead - Total (calculated) | 7439-92-1 | 1,000,000 | 5232_SB-04_0.5-1_S_SME_20151117 | Soil | 40' | Unknown | - | - | - |
| Lead - Fine Fraction | 7439-92-1 | 1,900,000 | 5232_SB-04_0.5-1_S_SME_20151117 | Soil | 40' | Unknown | - | - | - |
| Lead - Coarse Fraction | 7439-92-1 | 620,000 | 5232_SB-01_0.5-1_S_SME_20151117 | Soil | 25' | Unknown | - | - | - |
| Mercury | 7439-97-6 | 900 | 5232_SB-09_3.0-3.5_S_SME_20151117 | Soil | 10' | Unknown | - | - | - |
| Selenium | 7782-49-2 | 890 | 5232_SB-11_3-3.5_S_SME_20151117 | Soil | 10' | Unknown | - | - | - |

Total Number of Samples Collected: 43

Total Number of Samples Exceeding Criteria: 15



GRAPHIC SCALE: 1" = 60'



www.sme-usa.com

Project

**MDOT PARCELS
5145, 5146, 5232
AND 5233**

Project Location

**DETROIT,
MICHIGAN**

Sheet Name

**SOIL EXCEEDANCES
LOCATION
DIAGRAM**

No. Revision Date

Date **12-21-15**

CADD **GM**

Designer **CEB**

Scale **1" = 60'**

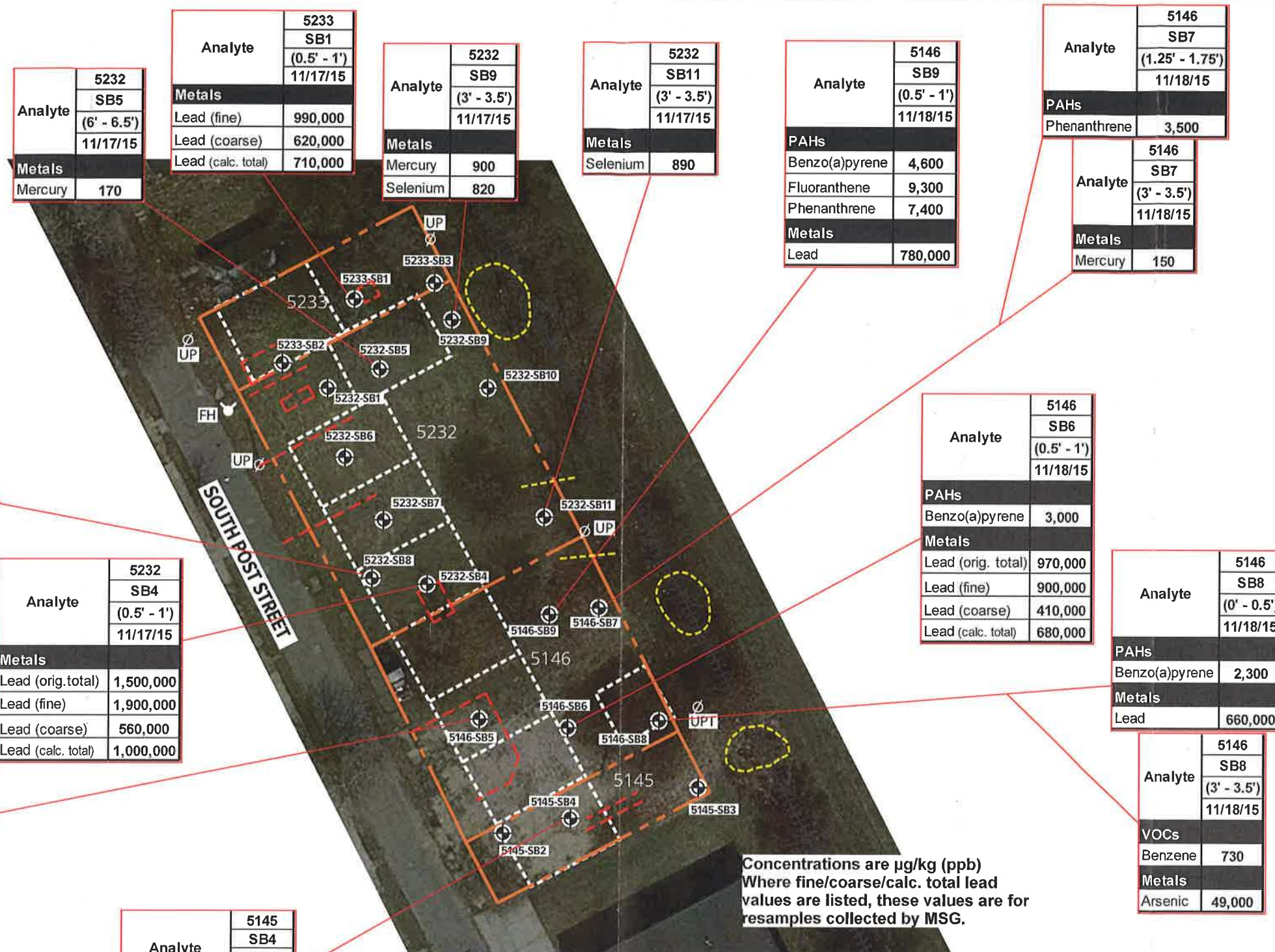
Project **073213.04.008.003**

Figure No.

2

DRAWING NOTE: SCALE DEPICTED IS MEANT FOR 11" X 17" AND WILL SCALE INCORRECTLY IF PRINTED ON ANY OTHER SIZE MEDIA.

NO REPRODUCTION SHALL BE MADE WITHOUT THE PRIOR CONSENT OF SME © 2015



Concentrations are µg/kg (ppb)
Where fine/coarse/calc. total lead
values are listed, these values are for
resamples collected by MSG.

LEGEND

- APPROXIMATE MDOT PARCEL BOUNDARY
- PROPOSED BORING LOCATION
- FEATURE (INFERRED FROM GEOPHYSICAL SURVEY)
- RAILWAY SPUR
- UTILITY POLE
- UTILITY POLE WITH TRANSFORMER
- FIRE HYDRANT
- POTENTIAL FORMER FOUNDATIONS (INFERRED FROM HISTORICAL AERIALS)

| | |
|---------|-------------|
| Analyte | 5232 |
| | SB8 |
| | (0.5' - 1') |
| | 11/17/15 |
| Metals | |
| Lead | 900,000 |

| | |
|---------|-----------|
| Analyte | 5232 |
| | SB8 |
| | (5' - 6') |
| | 11/17/15 |
| Metals | |
| Arsenic | 100,000 |

| | |
|------------------------|-------------|
| Analyte | 5146 |
| | SB5 |
| | (0.5' - 1') |
| | 11/18/15 |
| PAHs | |
| Acenaphthene | 42,000 |
| Anthracene | 61,000 |
| Benzo(a)anthracene | 85,000 |
| Benzo(a)pyrene | 73,000 |
| Benzo(b)fluoranthene | 89,000 |
| Dibenzo(a,h)anthracene | 13,000 |
| Fluoranthene | 200,000 |
| Fluorene | 37,000 |
| Indeno(1,2,3-cd)pyrene | 61,000 |
| 2-Methylnaphthalene | 18,000 |
| Naphthalene | 54,000 |
| Phenanthrene | 250,000 |
| Metals | |
| Lead | 510,000 |

| | |
|--------------------|-------------|
| Analyte | 5232 |
| | SB4 |
| | (0.5' - 1') |
| | 11/17/15 |
| Metals | |
| Lead (orig. total) | 1,500,000 |
| Lead (fine) | 1,900,000 |
| Lead (coarse) | 560,000 |
| Lead (calc. total) | 1,000,000 |

| | |
|----------------|-------------|
| Analyte | 5145 |
| | SB4 |
| | (0.5' - 1') |
| | 11/18/15 |
| PAHs | |
| Benzo(a)pyrene | 5,300 |
| Fluoranthene | 9,800 |
| Phenanthrene | 5,900 |

| | |
|---------|-------------|
| Analyte | 5232 |
| | SB5 |
| | (6' - 6.5') |
| | 11/17/15 |
| Metals | |
| Mercury | 170 |

| | |
|--------------------|-------------|
| Analyte | 5233 |
| | SB1 |
| | (0.5' - 1') |
| | 11/17/15 |
| Metals | |
| Lead (fine) | 990,000 |
| Lead (coarse) | 620,000 |
| Lead (calc. total) | 710,000 |

| | |
|----------|-------------|
| Analyte | 5232 |
| | SB9 |
| | (3' - 3.5') |
| | 11/17/15 |
| Metals | |
| Mercury | 900 |
| Selenium | 820 |

| | |
|----------|-------------|
| Analyte | 5232 |
| | SB11 |
| | (3' - 3.5') |
| | 11/17/15 |
| Metals | |
| Selenium | 890 |

| | |
|----------------|-------------|
| Analyte | 5146 |
| | SB9 |
| | (0.5' - 1') |
| | 11/18/15 |
| PAHs | |
| Benzo(a)pyrene | 4,600 |
| Fluoranthene | 9,300 |
| Phenanthrene | 7,400 |
| Metals | |
| Lead | 780,000 |

| | |
|--------------|-----------------|
| Analyte | 5146 |
| | SB7 |
| | (1.25' - 1.75') |
| | 11/18/15 |
| PAHs | |
| Phenanthrene | 3,500 |

| | |
|---------|-------------|
| Analyte | 5146 |
| | SB7 |
| | (3' - 3.5') |
| | 11/18/15 |
| Metals | |
| Mercury | 150 |

| | |
|--------------------|-------------|
| Analyte | 5146 |
| | SB6 |
| | (0.5' - 1') |
| | 11/18/15 |
| PAHs | |
| Benzo(a)pyrene | 3,000 |
| Metals | |
| Lead (orig. total) | 970,000 |
| Lead (fine) | 900,000 |
| Lead (coarse) | 410,000 |
| Lead (calc. total) | 680,000 |

| | |
|----------------|-------------|
| Analyte | 5146 |
| | SB8 |
| | (0' - 0.5') |
| | 11/18/15 |
| PAHs | |
| Benzo(a)pyrene | 2,300 |
| Metals | |
| Lead | 660,000 |

| | |
|---------|-------------|
| Analyte | 5146 |
| | SB8 |
| | (3' - 3.5') |
| | 11/18/15 |
| VOCs | |
| Benzene | 730 |
| Metals | |
| Arsenic | 49,000 |

NOTE:

1. PROPERTY FEATURE LOCATIONS ARE APPROXIMATE.
2. AERIAL PHOTO IS DATED 2015 AND WAS OBTAINED FROM GOOGLE EARTH PRO.
3. THE LOCATIONS OF POSSIBLE FORMER FOUNDATIONS WERE INFERRED FROM HISTORICAL AERIAL PHOTOS VIEWED AT <http://www.historicaerials.com>.
4. GPR FEATURES ARE APPROXIMATE AND WERE SURVEYED BY WORK SMART ON 11-16-2015.

THIS DIAGRAM WAS MADE IN COREL DRAW.