

EXHIBIT F

**Supplemental Narrative
New Horizon Utility Construction
Section 39.6570(A) - Surfacing Improvements**

February 4, 2025

The purpose of this supplemental narrative is to provide additional documentation regarding the applicant's request to deviate from the surfacing requirement of Section 39.6570(A) to allow parking to be located on existing gravel surfaces. As detailed below, a deviation to the surfacing requirement in this section is warranted and should be approved.

39.6570 - Improvements**(A) Surfacing**

(1) Except as otherwise provided in this section, all areas used for parking, loading or maneuvering of vehicles, including the driveway, shall be surfaced with at least two inches of blacktop on a four inch crushed rock base or at least six inches of Portland cement, unless a design providing additional load capacity is required by the fire service provider.

(2) The Approval Authority may permit and authorize a deviation from the surfacing standard in paragraph (A)(1) of this section and thereby authorize, alternate surfacing systems that provide a durable dustless surface, including gravel. A deviation under this paragraph may be permitted and authorized only upon finding that each parking area supporting the existing and the proposed development meets the following standards in subparagraphs (a) and (b) and, for parking areas of four or more required parking spaces, also meets the following standards in subparagraphs (c) and (d):

Response: *The applicant requests approval of a deviation to allow parking to be located on existing compacted gravel surfaces rather than requiring these surfaces to be paved as required by Section (A)(1) above.*

(a) The authorized provider of structural fire protection services verifies that the proposed deviation complies with such provider's fire apparatus access standards, or, if there is no such service provider, the building official verifies that the proposed deviation complies with the Oregon Fire Code;

Response: *Exhibit 1 to this narrative provides documentation from the authorized fire provider, Brandon Baird, Deputy Fire Marshal, Life Safety Division, Gresham Fire Department indicating a site Fire Access Plan has been approved without any additional paving required (January 29, 2025). This standard is met.*

(b) The County Engineer verifies that the proposed deviation complies with the County Road Rules and the County Design and Construction Manual Standards. Alternative surfacing can be considered for all areas used for parking, loading and maneuvering, including the driveway; however, approaches to paved public right-of-way shall be paved for a minimum of 21 feet from the fog line, or for a greater distance when required by the County Engineer;

Response: *Exhibit 2 to this narrative contains a memorandum dated January 21,*

2025 stating that County Transportation has no concerns with the proposal for onsite gravel parking instead of the required paved parking surface. This standard is met.

(c) Authorization of the proposed deviation would not:

1. be materially detrimental to the public welfare;
2. be injurious to property in the vicinity or in the base zone in which the property is located; or
3. adversely affect the appropriate development of adjoining properties; and

Response: *Most of the properties adjoining the subject property contain parking on existing gravel surfaces and there is no evidence to suggest the proposal would be detrimental to the public welfare, injurious to property in the vicinity or in the base zoned (OCI) in which the property is located, or adversely affect development of adjoining properties. This standard is met.*

(d) Any impacts resulting from the proposed resurfacing are mitigated to the extent practical. Mitigation may include, but is not limited to, such considerations as provision for pervious drainage capability, drainage runoff control and dust control. A dust control plan is required when a dwelling, excluding any dwelling served by the driveway, is located within 200 feet of any portion of the driveway for which gravel or other similar surfacing materials is proposed. Common dust control measures include, but are not limited to, reduced travel speeds, gravel maintenance planning, establishment of windbreaks and use of binder agents

Response: *All parking will be located on either existing paved or compacted gravel surfaces and no mitigation has been identified or is required. This standard is met.*

Exhibits:

1. Fire Marshal Approval
2. County Transportation Approval

6928 SE 282nd Avenue

Brandon Baird <brandon.baird@greshamoregon.gov>
To: Tracy Brown <tbrownplan@gmail.com>
Cc: Scott Johnson <scott@newhorizonutility.com>

Wed, Jan 29, 2025 at 3:38 PM

Tracy,

I have updated the fire letter and referenced the gravel lot not being required fire access. The plan is approved by fire. The expectations are that moving forward as you move through the permit process you will comply with the comments provided. I have attached our gate policy and Knox ordering form. Please let me know if you have any questions. Thanks.

[Quoted text hidden]

3 attachments

 **6928 SE 282nd Ave - BB 10-16-23.doc**
34K

 **Gates Policy.pdf**
449K

 **Lockbox Order Form.pdf**
719K

Project: New Horizon

6928 Se 282nd Ave

Gresham, OR 97080

FROM: Brandon Baird, Gresham Fire (Brandon.Baird@GreshamOregon.gov)

DATE: 10/16/2023

FIRE COMMENTS: This is an existing building that is going through the permit process with Multnomah County. No structural work or additions proposed during this submittal.

NOTE: Building permit plans shall include a separate "FIRE ACCESS AND WATER SUPPLY PLAN" indicating all of the following!

1. No Parking Fire Lane signage or curb marking will be required. Fire access roads 20' – 26' wide require the marking on both sides. Fire access roads 26' – 32' wide require the marking on one side. Indicate fire access on the building permit plans. I can email you our policy. ***OFC D 103.6 – Fire access demonstrated off public roads adjacent to the building in review. The parking lot is not required fire access.***
2. Provide fire flow per Oregon Fire Code Appendix B. Prior to applying for a building permit provide a fire flow test and report. The fire flow report will verify that the correct fire flow is available and will be required to have been conducted within the last 12 months. ***OFC 507.3 & B-101.1***
3. Prior to the building finals a 10" permanent address will be required high on the building, facing the address street, per Gresham Fire Addressing Policy. I can email the policy to you. ***OFC 505 & 1401***
4. The building address shall meet the Gresham Fire Addressing Policy. ***OFC 505.1***
5. Without knowing the current fire flow, a PUBLIC fire hydrant is required to be within 225 feet of the main entrance driveway. The furthest point on each building shall be no more than 500 feet from a hydrant. Private fire hydrants shall be installed along the entire length of the fire access road with spacing no more than 450 feet apart. Show on the building plans where the nearest existing and new hydrants are located. ***OFC Appendix C and 507***
6. Each public or private fire hydrant used for fire flow for this property shall have a 5-inch **Storz** adapter with National Standard Threads installed on the 4 ½ -inch fire hydrant outlet. ***OFC 507***
7. Fire hydrant locations shall be identified by the installation of reflective markers. The markers shall be BLUE. They shall be located adjacent and to the side of the centerline

of the access roadway that the fire hydrant is located on. In case that there is no center line, then assume a centerline, and place the marker accordingly. **OFC 508.5.4**

8. Required Fire Dept. Access Roads on site shall be designed to support an apparatus weighing 75,000 lb. gross vehicle weight. Provide an engineer's letter stating the access road meets those requirements at time of building permit submittal. **OFC, Appendix D, Section D102.1 - Fire access demonstrated off public roads adjacent to the building in review. The parking lot is not required fire access and does not need to meet the above requirement. A deviation proposed for gravel parking lot is approvable by fire due to it not being required fire access.**
9. **If** a gate is installed on a fire access road, it must meet the requirements of the Gresham Fire Gate Policy. This policy can be emailed to you if requested. **OFC 506. Per email on 1-29-25 gates access the property located off Powell Valley and 282nd will comply with GFD gate policies.**
10. Fire access roads shall be within 150' of all portions of the building. This is measured as the hose stretches from where the fire engine is parked. **OFC 503**
11. Dead-end fire apparatus access roads in excess of 150 feet shall be provided with width and turnaround provisions in accordance with **Table D103.4. D103.4**
12. The turning radius for all emergency apparatus roads shall be: 28' inside and 48' outside radius. **OFC 503.2.4**
13. The fire code official is authorized to require a key box to be installed in an approved location. Knox policy and ordering form can be emailed on request.
14. A fire access and water supply plan shall be submitted at the time of permit submittal. The plan needs to include fire hydrant locations and hydraulic calculations, proposed fire apparatus access, location of fire lanes and fire apparatus turnarounds. This plan shall be drawn to scale. This plan shall be approved prior to construction. **OFC 501.3 -Access plan provided and approved – BB 9-28-23**

TPR-2023-0002 and T2-2024-0031

Right of Way Permits <row.permits@multco.us>

Tue, Jan 21, 2025 at 3:58 PM

To: Tracy Brown <tbrownplan@gmail.com>

Cc: Rick Buen <rick.buen@multco.us>, Kelli Grover <kg@firwooddesign.com>, Scott Johnson <scott@newhorizonutility.com>, Marisol Cervantes <marisol.cervantes@multco.us>

Hi Tracy

County Engineering has no concern with the gravel parking area instead of a paved surface. See memo attached. Please note the previous review (TPR-2023-0002) requirement to fully close all accesses except the single, main access to the site. Please ensure that all new site plans submitted to land use planning meet this requirement.

Marisol from Land Use Planning is copied in to this email for their knowledge.

thanks,

Graham

Right-of-Way Permits
Multnomah County Transportation Division 503.988.5050
Bridges: 1403 SE Water Ave | Portland, Oregon 97214
Roads: 1600 SE 190th Ave | Portland, Oregon 97233


Please note: our permitting process has moved online, please go to our new [Permit Portal](#) for online submissions.

Further information/requirements for permits can be found at the following links.

[ROW Website](#)
[Learn about the Transportation Development Review Process](#)
[Road and Bridge Permit Applications](#)

On Thu, Jan 9, 2025 at 1:31 PM Right of Way Permits <row.permits@multco.us> wrote:

[Quoted text hidden]

 **TPR-2023-0002 rev - 6928 SE 282nd memo.pdf**
156K

MEMORANDUM

TO: Applicant

FROM: Graham Martin, Senior Planner (email: row.permits@multco.us)

DATE: January 21, 2025

ADDRESS: 6928 SE 282nd (R994191280)

SUBJECT: Transportation Development Review - Deviation to Paving Eight Parking Spaces - County Code Section 39.6570 A.2

Multnomah County Transportation has reviewed the above proposal and provides the following comments.

The comments provided in this memorandum are based on the preliminary project description provided to County Transportation. While every effort has been made to identify all related standards and issues, additional issues may arise and other standards not listed may become applicable as more information becomes available.

County Transportation Standards:

- Road Rules (MCRR): https://multco.us/file/multnomah_county_road_rules/download
- Design & Construction Manual (DCM): https://multco.us/file/multnomah_county_design_and_construction_manual/download

PROPOSAL Applicant requests County Engineering sign-off for deviation to Paving Eight Parking Spaces pursuant to County (Land Use) Code Section 39.6570 A.2.

County Transportation Engineering has no concerns with the proposal for on-site gravel parking instead of the required paved parking surface, as there are no conflicts with County Transportation Standards.

Applicant remains bound by the TPR-2023-0002 requirement to have one access to the property on SE Powell Valley Rd and close all other existing accesses. All new site plans should reflect the required changes.

ROW PERMITS **After Land Use approval, applicant will be required to apply for a driveway (ROW/General) permit ([MCRR 18.250](#)) on the [Permit Portal](#). A paved apron 20 feet from the roadway edge into the driveway must be provided.**