



**Multnomah Rural
Fire Protection
District No. 10**



To: Alan Rapplelea, Hearing Officer
Lisa Estrin, Senior Planner
Multnomah County Land Use and Planning Division
From: Rural Fire Protection District 10, Board of Directors

Date: August 3, 2023

Subject: T-3-2022-16220- Supplemental Testimony In Opposition

Multnomah Rural Fire Protection District 10 (RFPD10/the District) is submitting this supplemental testimony in opposition to the Portland Water Bureau's (PWB) proposed construction and operation of a water treatment and filtration plant, raw and finished water pipelines.

RFPD10 is a special district organized and existing under Chapter 478 of the Oregon Revised Statutes to provide fire and related services to territory within the District. The District's primary service area includes rural residential, agricultural and forestry uses and includes the proposed industrial water treatment plant site and all of the proposed raw and finished water pipelines.

1. In the written testimony dated June 26, 2023, the Board stated the Applicant misrepresented the availability of fire services for the proposed water filtration plant. Conditional Use Application Narrative, Winterbrook Planning | September, 2022 | page 84 states:

"Fire Protection (Appendix L.10.a): Gresham Fire and Emergency Services ("Gresham Fire") and Rural Fire Protection District 10 (the "District") provided the Fire Service Agency Review form in Appendix L.10a along with a cover letter from the District and a January 25, 2022 "Fire Service Agency Review" letter from Gresham Fire. The Fire Service Agency Review form confirms that the property is inside service boundaries. The January 2022 Gresham Fire letter describes, among other things, fire access, fire flow, and fire hydrant installation standards necessary to comply with the Fire Code requirements. The Water Bureau has incorporated these requirements from the January 2022 letter into the plans for the filtration facility proposed with this application. **Therefore, adequate fire protection public services are existing in the area.**"

In response, the RFPD10 testimony, dated June 26, 2023 states:

“Applicant alleges that the completion of a Fire Service Agency Review Form is the sole requirement for a conclusion that adequate fire protection services are existing in the area. In fact, the Fire Service Review Form is a limited scope review dealing with a small number of fire code requirements. **Nowhere, in the the Fire Service Review Form or the Fire Marshal’s letter is there any statement that could possibly be interpreted to support Applicant’s conclusion.....**” The RFPD10 cover letter (dated September 21, 2022) that accompanied the Fire Service Review Form stated: “As you know, the Board of Directors for RFPD10 authorized the release of the Fire Service Agency Review Form at its September 13, 2022 meeting. Additionally, **the Board directed that it be made clear to the Portland Water Bureau and Multnomah County Land Use Planning Division that release of this limited review form should in no way be interpreted as an approval or implied approval of the proposed facility by RFPD10...**”

In support of our previous testimony challenging the veracity of Applicant’s unsupported statement (see testimony dated 6/26/2023), RFPD10 is re-submitting as **Exhibit 1**, the Fire Service Review Form, the letter from the Gresham Fire Marshal and the cover letter from RFPD10. Review of these documents confirm the limited nature of the Fire Service Review Form. The Fire Service Review Form does not address numerous other Fire Code requirements, evaluate hazardous conditions created on rural roads or at the proposed filtration plant site, or RFPD10’s limitations related to specialty response capabilities, etc. These documents make clear that Applicant has absolutely no basis to make the claim that: **“adequate fire protection public services are existing in the area.”**

Additionally, the RFPD10 would like to point out that the Applicant was challenged on this matter at the District’s public hearing on November 29, 2022. At the conclusion of testimony on behalf of the PWB, David Peters, PWB Engineer, was read the entire passage from the application narrative that concluded with the statement noted above. Mr. Peters (who was well aware of the lengthy RFPD10 process to evaluate the Applicant’s proposed project and poised to approve a resolution and detailed report recommending denial of PWB land use application) was then asked directly if he felt that the application narrative and conclusion was an accurate reflection of the facts. Mr. Peters responded that the fire agency review form only asks for limited items and that is what went into the record with the land use application. Then Ms. Zoe Powers, attorney for the PWB at the time, spoke up and was asked the same question.

Ms. Powers indicated that the statement in the application was accurate. RFPD10 Board disagrees. RFPD10 put PWB on notice in its cover letter (dated September 21, 2022) and then again in the November 29, 2023 public hearing that the Fire Service Review Form was limited in scope and was not to be construed as an approval of their proposed project. Rather than obtain an affirmative statement of fire service adequacy from Gresham Fire and Emergency Services (GFES) or RFPD10, Applicant has continued to push the unsupported conclusion that adequate fire protection public services are existing in the area. This is not what the evidence shows.

Instead, Applicant chose to imply that the RFPD10 lacked “expertise” and made the unsupported claim that the District’s role was limited to requiring “conditions of approval to ensure compliance with fire code requirements.” (See RFPD10 written testimony dated 6/26/23 pgs. 2-4 and Winterbrook testimony dated May 8, 2023)

This proposed project is located entirely within the RFPD10 service area and RFPD10’s ability to serve evaluation is not constrained solely to fire code requirements.

RFPD10 Board wishes to make clear that we vigorously dispute any assertion that:

- **adequate fire protection public services are existing in the area; and/or**
- **RFPD10 is constrained in its ability to participate in this land use process in matters it has determined relate to emergency services and/or public safety in its service area.**

2. The following testimony responds to various Applicant statements made in their pre-submission statement dated June 29, 2023.

A. **Reference pg 4, “Transportation Planning Proposed Condition 5”** . This section proposes amendments to proposed conditions that RFPD10 has not responded to in previous testimony but wishes to do so now. Construction impacts are not limited to only those areas where pipeline construction is proposed but must include maintenance and restoration obligations on all County roads that will experience damage as a result of PWB construction activities. The listed road segments are insufficient to address the full impact area of the hundreds of thousands of heavy truck trips that would be required if the proposed projects were granted approval. RFPD10 has previously detailed concerns regarding the impact of heavy truck traffic on

rural roads that are not intended by design or policy to be used for this purpose thereby creating hazardous conditions that cannot be remediated. It is evident in the proposed condition that both the County Transportation Division and the Applicant are blatantly ignoring the obvious fact that the proposed heavy truck traffic will have to travel on additional segments of these same rural roads and cause the same damage and hazards to arrive at or upon leaving the proposed project areas. Consequently, the condition, as written, is inadequate and fails to meet the hazardous conditions criterion.

- B. **Reference pgs. 4,5,6 “Transportation Planning Proposed Condition 6”**
In this section, Applicant proposes to perform “full depth reclamation”(i.e. complete rebuild) of 4 road segments (approximately 1.6 miles) prior to use as “ a primary or detour through truck haul route.” Then an additional 2.6 +/- miles of rural roads are proposed to be re-built after the lengthly disruption caused by pipeline construction. While the District recognizes the current substandard condition of the rural roads, the Applicant’s proposal only makes the hazardous conditions created by their proposed project components worse. Applicant’s “fix it first” proposal **creates additional heavy truck traffic, road closures, detours, delays and concentrations of displaced traffic onto other substandard rural roads.** Consequently, hazardous conditions are exacerbated rather than remediated or even partially mitigated.

Applicant goes on to propose a definition of a “primary or detour through truck haul route” to mean a route “used for more than 2 months duration..... A 2 month period reflects the time period in which there is potential for material degradation of the road surface.” Applicant provides no evidence to support this claim. Degradation of surface is related to intensity of use not duration. For example, a substandard rural road that sees 100 heavy truck trips per day for 60 days (i.e. 6,000 trips) will suffer considerably more surface damage than the same road surface with 10 heavy truck trips per day for 60 days (i.e. 600 trips)

Applicant concludes this section by claiming: “applicant believes that staff’s goal to ensure that the transportation network maintains a condition that is safe, does not create a safety hazard for the traveling public, nor creates an on-going maintenance problem” is met.

As explained above and in previous testimony, the RFPD10 disagrees. Hazardous conditions will be created on rural roads during the extended construction period related to hundreds of thousands heavy truck trips, hundreds of thousands of work force trips, extended road closures, detours, traffic delays and then subsequently by the transport of approximately 1,000 deliveries of hazardous materials and haul off of many hundreds of loads of sludge every year, all of which jeopardize the health and safety of rural motorists, farm equipment operators, farm workers, pedestrians, bicyclists,

equestrians, and first responders. The Applicant's assertion that fixing some roads first or repairing some later eliminates safety hazards for the traveling public is misguided, lacks any supporting evidence and will actually exacerbate hazardous conditions.

The Applicant has failed to meet their burden. The Hazardous Conditions criterion is not met.

C. Reference pg. 8, **II. CONSTRUCTION-RELATED TRAFFIC AND OTHER CONSTRUCTION CONCERNS**

Applicant states: "The Water Bureau understands the concerns about construction traffic and has and will continue to work with neighbors and Multnomah County to ensure that impacts are minimized. Since 2017, the Water Bureau has been using a robust public outreach process to share information about the project and gather input from interested parties. Drawing on information received from over 60 local farms, schools, businesses, and others, the Water Bureau has already taken action to adapt the construction activities to help limit community disruption. For example, the Water Bureau has organized the timing of certain lane and roadway closures needed to safely install the new pipelines so that farm detours can be minimized during seasonal peaks for agricultural traffic and has instructed contractors to avoid school zones prior to and just after start and end times of school. If there are additional specific ways to adapt construction activities to help limit community disruption, the Water Bureau is open to that feedback."

We are aware that a variety of testimony has already been submitted by others that challenges Applicant's assertions related to robust outreach that "minimize" impacts. However, RFPD10 would like to point out that, to date, there has been no specific plan presented by the Applicant that provides any assurance that Emergency Response apparatus/staff will have un-delayed passage through the many construction zones their proposed project will create. We cannot over-emphasize the importance of every second and minute where someone's life or loss of one's home hangs in the balance.

RFPD10's previous testimony (December, 2022) noted that our response times are already affected by the size of our primary service area (14 sq. mi.) (see page 6)

Consider this scenario: Dodge Park Blvd. is closed for pipeline installation. More than one lane is impassable because there's a 15' to 20' wide trench excavated to depth of 15' on average. Next to this trench is a large semi-truck

with 40' segments of 72" steel pipes that are in the process of being off-loaded and lowered into the trench. Emergency Response vehicle approaches..... How long will it take to clear a lane? Any amount of time is too long! In this rural setting, detouring to another route is not a viable option. We don't have city blocks. An alternate route may be a mile or more away.

Additionally, our review of the proposed raw and finished water pipelines revealed at least 6 (possibly 7) different locations where proposed pipelines will cross rural roads thereby making them completely impassable. Applicant provides no information regarding how long these roads will remain impassable for these full road crossings. Included are:

- Lusted Rd. (Raw water)
- Cottrell Rd. (Finished water)
- Dodge Pk. Blvd. (Finished water)
- Lusted Rd. (Finished water)
- Altman Rd. (Finished water)
- Pipeline Rd. (Finished water)
- Oxbow Dr.(possible) (Finished water)

Again, Applicant has provided nothing more than vague comments that only pay lip service to RFPD10's fundamental requirement that first responders have un-delayed access to/through all rural roads and adjacent properties at all times. "Minimizing" or "limiting as much as possible" disruptions to this access is unacceptable and represents an indisputable hazardous condition that cannot be addressed with a condition that might be attached to an approval of this application.

D. Reference pg.11, **II. CONSTRUCTION-RELATED TRAFFIC AND OTHER CONSTRUCTION CONCERNS**

Applicant states: "Moreover, it is the applicant team's experience with Multnomah County – and indeed with all Oregon land use jurisdictions – that they have not previously interpreted general land use review approval criteria that do not reference construction or construction concepts to require evidence about construction, such as construction TIAs. **Note, for example, that no evaluation of the construction activities or construction traffic was even suggested when the significant change to farm practices standard was applied to Lusted Hill's lattice tower. (Staff's Exhibit B.11, page 4)....**"

Regarding the portion of the above quote in "**bold**", it is our understanding that the referenced land use process was for the construction of a 125' tall lattice tower to support radio antenna and that it involved only a tiny fraction of the

total 14.55 acre site. We are unaware of any portion of this tower construction project that required any excavation in rural road ROWs for the installation of pipelines or caused extended road closures, detours or delays for local traffic or Emergency Response equipment/staff or resulted in ongoing hazardous conditions or required emergency services beyond those available or planned for in the future. By comparison, the subject of this application has been reported by KGW News to be the “largest or second largest public works project in Portland’s history” and described to the City Council by PWB staff not as “large” or “big” but as a “mega-project.” This proposed “mega-project” **will** require services beyond those provided by RFPD10 and **will** create unavoidable hazardous conditions during its lengthy construction and ongoing operation.

Reference pg. 10, **III. FIRE PROTECTION**

Applicant states: “In response to concerns from Rural Fire Protection District No. 10, enclosed as Attachment 7 to this Pre-Hearing Statement is a Bull Run Filtration Facility Fire Protection Strategy memorandum that describes the filtration facility fire protection design and internal emergency response capabilities. As described in the memorandum, the facility includes multiple layers of fire and chemical protection and containment. Staff are also trained to address emergency situations. Those facility features and staff training collectively reduce the likelihood of a situation that would require any outside response or fast response times.”

It is to be expected, if not required by various codes, that the litany of facility design elements and staff training topics are included in this proposed industrial scale filtration plant. These design elements and training topics are typical in similar industrial developments where a variety of hazardous conditions exist on a daily basis. As the Applicant suggests, these features are intended to “**reduce the likelihood** of a situation that would require any outside response or fast response times.” Obviously, even the Applicant understands these features **do not eliminate** the need for outside response or timely response. They are intended to be “stop-gap”, not “in-lieu-of” a timely response from a professional, fully equipped emergency response agency. To suggest otherwise is mis-guided and implies that Applicant is willing to disregard the health and safety of the staff that would be tasked with operating the proposed plant in order to gain this land use approval. As noted in previous testimony from RFPD10, despite all the design features to ensure safety, best management practices, aggressive training, adherence to applicable local, state and federal regulations etc., all too frequently, human error and/or mechanical failures result in serious incidents that cause injuries, fatalities or environmental damage. **Industrial developments like this proposal should be located within the**

Urban Growth Boundary where they are in proximity to appropriate urban scale emergency services.

Notwithstanding our comments above, none of the design features and staff training detailed by Applicant address the District's previous testimony regarding the ongoing transport of a variety of hazardous materials on substandard rural roads in all weather conditions. This issue represents an ongoing hazardous condition that cannot be avoided, remediated or mitigated. Applicant has failed to meet its burden. This proposed project simply does not belong in this rural area.

E. Reference Attachment 3, Construction Transportation Demand Management Plan

This document is inadequate for the following reasons:

- It is focused solely on peak hour traffic.
- It is reactive as opposed to proactive (i.e. requires traffic to exceed so-called "peak hour" maximums before remedies implemented.)
- The primary measure relied upon is the direction of "commuter traffic" to "the Bluff Road access. **NOTE: Clackamas County has denied the use of Bluff Road for ALL construction access.** PWB did not appeal this decision thereby undercutting all the measures proposed in this plan
- Lacks details about proposed shuttles, incentives, staggered start times etc. Instead, these details are left to some vague future time which suggests the plans required for implementation would only be developed after a problem is identified thereby adding time to a potential solution that may have already existed for 2 or more weeks (proposed report frequency).
- Lacks any evidence to support a conclusion that the proposed measures will actually achieve the stated objective.
- Provides no rationale for the proposed termination of the TDM Plan if "there is a 150 vehicle trip reduction from the "peak total daily traffic accessing the site for a one month period. There are any number of reasons that could cause a work slow down including, but not limited to weather, labor issues, supply chain issues etc.
- Fails to consider the impact of the finished water pipeline that will be installed in Dodge Park Blvd. that requires crossing Cottrell Rd (eliminating the only remaining construction access via Carpenter Ln.) resulting in road closures, detours, and delays.

These inadequacies provide further evidence in support of RFPD10's previous testimony that this project will create hazardous conditions that cannot be avoided, remediated or even partially mitigated.

F. Reference Attachment 4, T-3-2022-16220- Filtration Facility and Pipelines Construction Activities

Attachment 4 purports to provide clarity regarding the “phasing and timelines” of various project components. It is inadequate and fails to accomplish its objective for the following reasons:

- It fails to address the specific requirement included in the Fire Marshall’s limited review of the proposed project (letter dated January 25, 2022, see Exhibit 1) that states: “5. Required fire flow from nearest fire hydrant is 1,500 gpm. at 20 psi. for 3 hours for the buildings being protected per 903.3.3.1.1 NFPA 13 based 28,615 sq. ft. V-B building square feet. Fire flow is calculated from Oregon Fire Code App. B. **Please keep in mind the required fire flow is required to be on site and approved prior to the building being built and or combustible materials come on site for building the buildings 507.3 & Appendix B.**” (emphasis added)

This work/approval would appear to be required before Mobilization/Site Setup is permitted to begin but is not even mentioned.

- It splits the pipeline elements and filtration plant elements into 2 separate projects when the reality is that work on both will be occurring concurrently. This bifurcation makes it impossible to determine the complete impact on rural roads that provide the sole means of access to emergency calls for RFPD10 first responders. There are other formats that should have been used to provide project phasing/timeline information in a coherent manner that actually shows which project elements are underway concurrently and the duration of each.
- The document spreads certain project elements over multiple phases. For example, offsite disposal of materials is spread over at least 3 phases that total up to 46-52 months (4+years). The document provides no detail about how the massive amount of traffic this project element is to be coordinated with all the traffic related to other filtration and pipeline project elements.
- Total amount of time indicated for the pipeline project elements is 157 months (13+ years). As noted in the document, multiple phases of the pipelines project will be occurring concurrently, however it’s impossible to determine how Applicant is proposing to coordinate these various elements. If approved, the scale and scope of just the pipeline projects will have significant impacts on RFPD10’s ability to provide timely response to emergency calls which is already strained by the size of our primary service area. As noted in previous testimony, the massive increase in traffic coupled with major and lengthily detours, road closures, and delays is also likely to increase call load at RFPD10 Station 76.

Applicant filed this land use application in October, 2022. RFPD10 has been raising issues related to the use of substandard rural roads for construction and on-going operations well in advance of that submission. Ample time has been available for Applicant to provide meaningful responses to RFPD10's concerns but Applicant has failed to do so. Instead, Applicant has submitted vague, confusing and misleading information as noted above with its request that "conditions of approval" allow the details to be left for some future time. We urge this approach be rejected.

G. Conclusion

RFPD10 has completed in-depth and thorough due diligence regarding Applicant's proposal. Our sole interest has been and continues to be public safety and our ability to provide emergency services within our primary service area. The experience of this Board in consultation with GFES provides us with unparalleled perspective related to emergency services in this rural community.

RFPD10's process to evaluate this land-use application has spanned more than 2 years. It included meaningful public involvement (including the PWB) and investigations into all aspects of the proposed project including both construction and on-going operations. Our initial testimony (December, 2022) explained, in detail, how the proposal would require services beyond those currently available or planned for the future. It also identified and explained, in detail, the numerous hazardous conditions that would be created on substandard rural roads and at the proposed filtration plant. Based on our due diligence, RFPD10 made 20 Findings that support our recommendation that this Application be denied.

Subsequently, additional testimony was submitted (June, 26, 2023) which challenged Applicant's assertion that "adequate fire services are available" and provided detailed response to Applicant's consultant memorandum from Winterbrook (May 8, 2023). This testimony provides further evidence supporting our recommendation that this application be denied because it will require public services beyond those currently provided or planned for in the future; it will create hazardous conditions that cannot be remediated and it is inconsistent with policies contained in Chapter 12 (Transportation System Plan) of the Multnomah County Comprehensive Plan.

This supplemental testimony provides detailed response to variety of assertions/information presented in Applicant's Pre-Hearing Statement (dated June 29, 2023) that provides further support for our conclusion that this Application fails to meet specific criteria included in MCC 39.7515.

Therefore, RFPD10 Board of Directors recommends denial of Application T-3-2022016220.

Thank you for the opportunity to submit this additional testimony.



**Multnomah Rural
Fire Protection
District No. 10**

Supplemental Testimony in Opposition dated August 3, 2023

Exhibit 1

- Fire Service Agency Review Form
- Letter from Gresham Fire Marshal
- Cover Letter from RFPD#10 – September 21, 2022



Land Use Planning Division
 1600 SE 190th Ave, Ste 116
 Portland OR 97233
 Ph: 503-988-3043 Fax: 503-988-3389
 multco.us/landuse

**FIRE SERVICE AGENCY
 REVIEW**

TO THE APPLICANT: Take this form to the Structural Fire Service Provider* that serves your property along with the following:

- A site plan drawn to scale showing the subject property, its improvements, location of fire hydrants and driveway information; **A - Site Plan.pdf**
- A floor plan of the proposed development; and **B - Floor Plans.pdf**
- A fire flow report from your water purveyor (if applicable) [Not applicable for Properties served by MCRFD#14 customers] **C - Water Supply TM.pdf**
- After the fire official signs this form, include it with your application material. See Fire Code Application Guide for fire-related access standards and fire flow information.

*If your property is not served by a structural fire service provider, your project is to be reviewed by the appropriate building official serving your property.

Address of Site Unassigned, SE Carpenter Lane (Located across from 35319 SE Carpenter Lane)

Map & Tax Lot: SECTION 22 1S 4E, TL 400 56.87 ACRES
SECTION 22 1S 4E, TL 100 36.62 ACRES 'R' number R994220980 & R994220820

Description of Proposed Use: Water filtration facility including admin and maintenance buildings, communications facilities, treatment processes, and general, chemical, and equipment storage.
 Total Square Footage of Building (including roof projections, eaves & attached structures): varies, see Table in A

Applicant Name: City of Portland Water Bureau - Attn: Lyda Hakes Phone: 503-865-4713

Mailing Address: 1120 SW 5th Avenue Rm 405

City: Portland State: OR Zip Code: 97204 Email: lyda.hakes@portlandoregon.gov

STRUCTURAL FIRE SERVICE AGENCY REVIEW

Fire Agency completing this form: Gresham Fire Emergency Services Date of Review Jan 25, 2022

- The subject property is located within our service boundaries or is under contract.
- The subject property is outside of our service boundaries and will not be providing fire protection services via contract. (Additional review is not needed.)

**** Access Review by Structural Fire Service Agency Providing Service ****

- The proposed development is in compliance with the fire apparatus access standards of the Oregon Fire Code standards as implemented by our agency.
- The following access improvements must be completed prior to issuance of the building permit and be re-inspected by our agency before flammable materials are placed on the property.

See the attached document

- The proposed development is not in compliance with the adopted Fire Service Agency's access standards. The proposed building/structure is required to have a fire sprinkler system installed in compliance with Section 903.1.3 (NFPA 13D) of the Oregon Fire Code.

Fire Official: Please sign or stamp the presented site plan & floor plan and attach it to this form.

Robert Mottler DFMU

Signature & Title of Fire Official

STRUCTURAL FIRE SERVICE AGENCY REVIEW, cont.

**** Fire Flow by Structural Fire Service Agency Providing Service ****

The structure, building or addition is exempt from the fire flow standards of the OFC B-105.2.

- The proposed non-commercial structure is less than 3,600 sq. ft. (including the horizontal projections of the roof) and there is 1,000 gallons per minute of fire-flow available at 20 psi from public water lines. No mitigation measures are necessary.
- The proposed non-commercial structure is more than 3,600 sq. ft. (including the horizontal projections of the roof) and the fire-flow & flow duration at 20 psi is available from public water lines or private well and is in compliance with minimums specified in Appendix B, Table B105.1 of the Oregon Fire Code. No mitigation measures are necessary.
- The existing fire-flow & flow duration available from public water lines or private well is not adequate to serve the proposed non-commercial structure in compliance with Appendix B of the Oregon Fire Code. The following mitigation measures are necessary* and must be installed prior to occupancy or use of the structure.
 - A monitored fire alarm must be installed.
 - Class A or non-combustible roof materials must be installed.
 - Defensible space of 30 feet around the structure/building/addition.
 - A defensible space of 100 feet around the structure/building/addition due to slopes greater than 20 %.
 - A fire sprinkler system meeting Section 903.1.3 (NFPA 13D) of the Oregon Fire Code shall be installed.
 - Other _____

* The above required structural features are required by the Oregon Fire Code and shall be shown clearly on all building plans.

Commercial/Industrial Buildings & Uses.

- The minimum fire flow and flow duration is available from public water lines or private well as specified in Appendix B, Table B105.1. No mitigation measures are required.
- The minimum fire flow & flow duration is not available from public water lines or private well as specified in Appendix B, Table B105.1. The following mitigation measures are required:

See attached

Robert D. Matus DFMU

Signature & Title of Fire Official

To the Fire Official:

- Land Use Planning has determined that the proposed building will qualify as an Exempt Farm Structure and the property owner has indicated that the building will be used solely for farm purposes and they intend on using the provision under ORS 455.315 and will not be obtaining a building permit for its construction.

Multnomah County Land Use Planning



1333 NW Eastman Parkway, Gresham, Oregon 97030-3813
Phone 503-618-2355 • Fax 503-666-8330
GreshamOregon.gov/fire

Fire Service Agency Review:

January 25, 2022

Portland Water Bureau
Filtration Facility
SE Carpenter Lane
Gresham, Oregon

Plan Review Comments / Multnomah County

1. Prior to construction material arriving on site, provide a temporary address of 6" at the property entrance. Prior to building final, a permanent 6" address shall be installed. Refer to the Addressing Guide attached. ***OFC 505 & ORSC319***
2. Access roads shall be a minimum of 20 feet wide, or where the building height exceeds 30 feet to the highest roof surface the fire access roadway shall be 26 feet wide or where a fire hydrant is placed along the fire access roadway. Fire access around buildings that exceed 30 feet in height shall have clear aerial apparatus access that is within 15 feet and no more than 30 feet of the building along the entire length of the buildings over thirty feet in height. A clear height of 13 feet 6 inches shall be provided off the road surface. The roadway shall be all weather driving capabilities and support fire apparatus weighing 75,000lbs. ***503.2***
3. A secondary emergency access road is required based on the size of this project and square footage of the buildings being proposed. The requested or proposed ten-foot road surface and five-foot shoulders is **not allowed for commercial projects** the minimum width of the roadways shall be 20 feet wide and shall be all weather surface and able to support 75,000 lbs. Fire hydrants shall be spaced along this roadway every 1000 feet where no buildings are built and then the roadway width shall be increase to 26 feet wide twenty feet on each side of the fire hydrant. Two separate fire access roads are required and shall be separated by at least ½ the diagonal lot distance **See appendix D**
4. The fire access roadway grade shall not exceed 10%. ***503.2.7***
5. Required fire flow from the nearest fire hydrant is 1,500 gpm at 20 psi for 3 hours for the buildings being protected per 903.3.1.1 NFPA 13 based 28,614 square feet V-B building square feet. Fire flow is calculated from the Oregon Fire Code App B. Please keep in mind the required fire flow is required to be on site and approved prior to the building being built and or combustible materials come on site for building the buildings. ***507.3 & Appendix B***

6. If a gate is installed across the driveway, it must meet the Gresham Fire Gate Policy. Fire access will need to be reviewed and approved prior to gate installation. A Knox lock box is to be required where the gate is a power operated gate or where a manual gate is used shall have a Knox pad lock installed and a gate keeper style multiple pad lock device installed where more than one pad lock is installed. **503.5**
7. Fire Lane marking will be required along the fire access roads and shall either be sign and or painted curbs or a combination of both. The layout shall be approved by GFES. OFC D103.

Thanks,

Robert Mottice
Captain DFM II
Gresham Fire & Emergency Services
GFES@GreshamOregon.gov
503-618-2355



**Multnomah Rural
Fire Protection
District No. 10**

September 21, 2022

Mr. David Peters, P.E.
Bull Run Filtration Project
Portland Water Bureau
1120 SW 5th Ave. 106544
Portland OR 97204

Dear Mr. Peters,

Please find enclosed the completed Fire Service Agency Review Form related to the Portland Water Bureau's proposed water filtration plant within the service area of Multnomah Rural Fire Protection District 10 (RFPD 10).

As you know, the Board of Directors for RFPD 10 authorized the release of the Fire Service Agency Review Form at its September 13, 2022 meeting. Additionally, the Board directed that it be made clear to the Portland Water Bureau and Multnomah county Land Use Planning Division that release of this limited review form should in no way be interpreted as an approval or implied approval of the proposed facility by RFPD 10.

Consistent with the Multnomah County Comprehensive Plan (Strategy 11.17-2), RFPD 10 Directors are continuing to evaluate the proposed plant and its impacts on the service we provide and the health and safety of the residents of the rural community and our first responders. At the appropriate time, RFPD 10 intends to submit testimony for consideration in the land use process.

Submitted on Behalf of the Board

Michael McKeel, Chair

cc: Ms. Lisa Estrin, Multnomah County Land Use Planning Division