

VE RESPOND *Always Ready Always There*

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Date: January 23, 2015

To: Planning and Sustainability Commission

From: Merrill Gonterman

Subject: 2035 Comprehensive Plan

The Comprehensive Plan update provides a rare opportunity to guide future development and investments in Portland. Toward the goal of protecting and enhance the health and safety of all Portlanders, Portland Fire & Rescue offers the following comments and suggestions:

- 1. The draft Citywide Systems Plan should clarify that the need for more fire and rescue stations or other facilities/equipment will be affected by the impacts of growth on emergency "response time" and "response reliability". These factors reflect geography, call volume, and other drivers. As population and development density increase, increased call volumes, traffic and congestion on emergency response routes will increase response time and reduce response reliability.
- 2. Where Comprehensive Plan documents refer to "fire stations", please change to "Fire & Rescue stations". This change reflects correct terminology and more accurate description of PF&R's role and functions.
- 3. Clarify that while Station 21 is new, it was staffed by closing Station 23. So as one hole was filled another opened up.
- 4. Please signal that PF&R will likely need to vacate the Gideon facility near the new MAX station and will be needing to find another site. A 3.5 acre site will be needed to replace the functions of emergency apparatus maintenance, logistics, prevention, and a training annex. The location of PF&R's training center at SE 122nd requires an hour of travel. This is time during which PF&R cannot provide emergency services. A Training annex should be located in a more central site, preferably on the east side.
- 5. PF&R appreciates the Comp Plan land use map proposal that would reduce potential future development in wildfire and landslide prone areas with steep slopes, and narrow, windy roads with limited ingress or egress

options. In most of these proposed down-designation areas, average response times are quite a bit longer than in many other parts of the city. This is due to many factors, but especially terrain, road design, condition and connectivity, and distance to fire stations. In such areas emergency vehicle access and evacuations are often challenging. Our experience is that additional development, particularly the addition of individual homes or small land divisions increase congestion and demand for emergency service without significant improvements in street connectivity, width, or load bearing capacity. This can increase response time and ultimately response reliability.

6. It is critical that the City establish goals and policies to address the tank farms along the Willamette River in the Linnton area. These facilities pose multiple hazard risks that would be triggered by earthquake, flooding, fire, explosion, or transportation-related accidents. The Comp Plan should include goals and policies to effectively address public safety issues for these facilities by 2035.

Thank you for considering these comments. Please let me know if Portland Fire & Rescue can provide additional information that would help support the Comprehensive Plan update. My staff and I look forward to continued collaboration as the project proceeds toward completion.