Jo Ann Hardesty, Commissioner Sara Boone, Fire Chief AJ Jackson, Fire Marshal Prevention Division 1300 SE Gideon Street Portland, OR, 97202 Phone: (503) 823-3770

January 24, 2020

Morgan Tracy,

Over the years, Fire has worked with PBOT and BPS regarding issues involving fire department access, and I believe we did work with BPS on the RIP. You are absolutely correct that meeting fire department access road requirements is not isolated to the RIP but a general citywide issue relating to residential and commercial developments. The street/fire department access requirements that are in the Fire Code and PBOT Street Guide often conflict when they pertain to street design and fire department access requirements. To simplify matters, the Portland Fire Code states fire department access requirements regulate the development of new private streets and apply to all structures, ensuring fire department access and firefighting water supply requirements are being met. PBOT has the authority regarding the design and development of new and existing public streets. Thus, to state a street is "illegal" because it doesn't meet current Fire Code is not a correct statement.

I agree the dead-end requirement is an important fire code requirement. However, there are other factors that determine Fire's ability to navigate the streets to move and operate necessary equipment in response to an emergency incident, such as vertical clearance, road width and grade. As Ms. Williams alluded to, without an adequate turn-around, it makes it difficult to get our equipment turned-around once at the end of a dead-end road. Yet this does not mean it will negatively impact our ability to respond to an incident on a dead-end road.

Indirectly, the fire code does take this into consideration, as it has other thresholds when it requires at least two means of fire department access:

- Commercial and Industrial Developments greater than three stories or 30 feet in height
- Buildings exceeding 62,000 square feet (124,000 square feet with a fire sprinkler system protection)
- Multi-family residential developments/projects with more than 200 units (with fire sprinkler protection)

When residential and commercial properties are proposed to be developed on these preexisting streets, Fire does work with the applicant to ensure Fire has the ability to respond to the location if an incident does occur. Generally speaking, fire sprinkler protection, Class A roof coverings, and/or non-combustible sidings are often required in-lieu of meeting all fire department access requirements in new structures via the Fire Code Appeals process. Morgan Tracy January 24, 2020 Page Two

Overall, Fire's philosophy is building a safe environment for our community while balancing fire code requirements with current existing conditions.

Please feel free to contact me if you have any questions or concerns.

Respectfully,

Nate Takara

Assistant Fire Marshal Portland Fire & Rescue