

May 2023



## Findings of Conditions of Approval for Veranda at Pleasant Valley Responses to City Staff Report Dated July 3, 2022 (File No. SD/MIS 20-26000343)

Veranda at Pleasant Valley is a planned subdivision located at 7928 SE 190<sup>th</sup> Drive in the City of Gresham (File No. SD/MIS 20-26000343/MPLAN21-00652). The City staff report dated July 3<sup>rd</sup>, 2022, denied the application for subdivision, citing multiple unmet Gresham Community Development Code (GDC) standards. Following this denial, AKS Engineering & Forestry revised the subdivision's design to support project approval. This document includes responses to staff report findings that, along with supplemental documentation provided in conjunction with these responses to findings, demonstrate that the revised subdivision plan meets the standards of the GDC.

### Additional Information Supporting Findings of Compliance

#### 4.1408(A) Development Standards Table (Page 20 of City Staff Report)

*The proposed revised density of 169 units did not take into consideration that over 5 acres of the site is designated by DSL as wetland (See Exhibit D). These wetland areas are to be largely excluded from development. A wetland identified during the course of a development permit review that meets the State of Oregon's definition of a "Locally Significant Wetland" shall be subject to the standards of the ESRA-PV (4.1432.A). Such wetlands shall be added to the ESRA map by the Manager, under the Type 1 procedure, after the development permit becomes final.*

**Response:** The updated master plan includes 175 units. The density of 175 units meets the density requirements for the LDR-PV and MDR-PV zoning districts as demonstrated by the "Density Calculations for Veranda at Pleasant Valley" table found in responses to Section 4.1476 of the Gresham Development Code (GDC) below. Density was calculated with net acreages of ±10.23 acres (±445,618 sq. ft.), which includes the mapped Environmentally Sensitive Resource Area (ESRA) (which includes delineation of a locally significant drainage along the eastern property boundary and the required 50-foot disturbance setback) and public right-of-way.

As discussed in the AKS' May 2023, ESRA-PV Mitigation Plan Memorandum, there is no documented evidence to support the Oregon Department of State Lands (DSL)-concurring wetlands provide *improvement* for year-round temperature cooling in Kelley Creek; therefore, in accordance with Oregon Administrative Rule (OAR) 141-086-0350(2)(b), DSL-concurring wetlands may not be subject to standards set forth under Section 4.1400 of GDC. The applicant will obtain all necessary federal and state wetland permits required for wetland impacts and conduct wetland mitigation in accordance with state and federal regulations. Wetland mitigation will consist of wetland restoration and/or creation within the Kelley Creek and Johnson Creek watersheds. Mapped ESRA-PV encroachments will be mitigated on-site in accordance with GDC Section 4.1445. Mitigation will occur within existing remaining ESRA-PV at a 2:1 enhancement-to-impact-area ratio. The applicant will also conduct +/-8.26 acres of additional voluntary water quality enhancement within remaining on-site ESRA-PV to provide a direct improvement to water cooling to Kelley Creek. All enhancement activities will consist of the removal of all non-native invasive

vegetation followed by densely planting with native trees and shrubs to establish a native closed canopy corridor along Kelley Creek. In addition to the vegetative enhancement, the applicant will remove existing structures and impervious areas from within mapped ESRA-PV next to Kelley Creek and plant native trees and shrubs to restore these areas to natural conditions. In total, the project will provide over 12 acres of enhanced and protected ESRA-PV along Kelley Creek.

**4.1473 Level of Detail (Page 5 of City Staff Report)**

*(A) Master plans are intended to display conceptual designs for land use, transportation, natural resource areas, and other physical attributes of the subject property. Similarly, public facility information is intended to be submitted at a conceptual level of detail sufficient to demonstrate compliance with the approval criteria.*

**Response:** Staff found this standard had not been met due to a Preliminary Plan that did not “provide for the preservation of natural resource areas mostly at the center of the site... as identified as jurisdictional wetland by DSL.” Staff described lots planned within the DSL concurred wetland area as “contrary to the standards of Section 4.1443.”

According to the City mapping, Kelley Creek, the associated floodplain, and riparian areas are mapped as Environmentally Sensitive Resource Areas (ESRA) on the City’s 2019 Pleasant Valley Land Use District ESRA-PV Map. The City’s ESRA-PV subdistrict map also includes a locally significant forested area located in the southeast corner of the site. In addition, AKS delineated a locally significant drainage extending into the eastern portion of the site.

The updated Preliminary Plan was revised to remove all lots from within ESRA-PV, including the locally significant drainage in the east. Only minor encroachment into the outer edges of ESRA-PV for public roads, public trails, and an off-site stormwater facility are proposed (see the Preliminary Plans). The off-site stormwater facility is planned to be located on Tax Lot 400 of Multnomah County Tax Map 1S3E20C (referred to as the “Panza property” in the staff report) and is adjacent to an existing stormwater facility on the same property. These ESRA-PV encroachments are considered allowed uses within an ESRA-PV by GDC Section 4.1437 Uses Allowed Under Prescribed Conditions. On-site enhancement mitigation within the remaining ESRA-PV is provided in accordance with GDC Section 4.1445 Mitigation Standards to compensate for allowed ESRA-PV disturbance. The encroachments within ESRA-PV were further revised from previous submittals to reduce the extent of ESRA-PV encroachment as much as possible, which included reducing the number of lots over previous submittals. The updated Preliminary Plans show the location of the enhancement mitigation areas to demonstrate compliance with the approval criteria.

The applicant has agreed to provide voluntary water quality improvement enhancement, resulting in over 8 acres of additional enhanced habitat.

The applicant will mitigate wetland impacts within the Kelley Creek and Johnson Creek watersheds as much as attainable and appropriate land is available in accordance with state and federal mitigation requirements. Wetland mitigation will meet requirements

outlined within OAR 141-085-0690(1). Oregon removal-fill guidelines require the replacement of lost functions through a detailed and thorough analysis and approved mitigation plan. The applicant will coordinate all mitigation efforts with DSL and the City prior to impacting wetlands on the site to ensure that all wetland functions lost by the project will be replaced in the watershed as much as possible. DSL will require monitoring, maintenance, and protection of the wetland mitigation areas with a deed restriction for protection in perpetuity. The applicant will secure any required City of Gresham Natural Resource Overlay (NRO) permits for wetland mitigation activities within a mapped Resource Area (RA) or Potential Resource Area (PRA).

**4.1475 Neighborhood Design Guidelines (Page 7 of City Staff Report)**

*(D) Neighborhoods shall be designed to incorporate the existing natural features in a way that enhances the aesthetic environment while minimizing impacts. A compact, mixed-use neighborhood with transit options is one strategy for preserving open space and natural resource areas.*

**Response:** As demonstrated by the updated Preliminary Plans, portions of SW 44<sup>th</sup> and 45<sup>th</sup> Streets extend within the outermost edges of mapped ESRA-PV. The applicant revised the SW 45<sup>th</sup> Street and SE 190<sup>th</sup> Drive intersection alignment to minimize tree removal, including avoidance of larger-diameter fir trees, and to further minimize ESRA-PV impacts. This realignment to minimize ESRA-PV impacts resulted in the loss of residential lots over previous submittals. The updated layout avoids impacts to the locally significant drainage delineated by AKS in March 2023 along the eastern site boundary.

The necessary encroachments within the ESRA-PV can be considered allowed by GDC Section 4.1437 Uses Allowed Under Prescribed Conditions. On-site enhancement mitigation will be provided in accordance with GDC Section 4.1445 Mitigation Standards.

To facilitate increased transportation options, the updated Preliminary Plans include mid-block pedestrian paths for blocks greater than 400 feet long. Additionally, a soft surface pedestrian path is planned to cross the ESRA-PV with a bridge spanning Kelley Creek and floodplain for a required connection to the existing public trail on adjacent property to the north. The encroachment for the pedestrian trail to cross ESRA-PV is considered allowed per GDC Section 4.1444. This project will result in over 12 acres of enhanced and protected ESRA-PV which will be protected in open space tracts.

As demonstrated by the updated Preliminary Plans, the subdivision was updated to sufficiently incorporate natural features and minimize impacts to the ESRA-PV. On-site enhancement mitigation is provided for impacts to ESRA-PV by the planned improvements.

*(F) Neighborhoods shall have strong connections to the Kelley Creek and Mitchell Creek open space systems. The design and function of neighborhoods shall facilitate preserving, enhancing, and restoring Pleasant Valley's open space system.*

**Response:** As demonstrated by the updated Preliminary Plans, Kelley Creek and the adjacent riparian areas will be adequately preserved and enhanced. In addition, existing structures and impervious surfaces within ESRA-PV adjacent to Kelley Creek will be voluntarily removed



to restore native habitat conditions. These structures have been present since as early as 1939's and are remnant features from a former agricultural dairy farm use on the site.

As demonstrated by the updated Preliminary Plans, lots adjacent to this ESRA-PV will have frontage and face the Kelley Creek ESRA, facilitating a stronger neighborhood connection to open space areas. A soft surface pedestrian pathway will be provided along the length of the streets within the outermost edges of the ESRA-PV boundary to allow for neighborhood enjoyment of the open space area. Additionally, a pedestrian pathway over Kelley Creek is planned through the ESRA-PV to connect the Veranda subdivision with the adjacent neighborhood to the north, increasing neighborhood connectivity and accessibility of the open space to local residents. Therefore, the updated Preliminary Plans and planned subdivision preserve, enhance, and restore the Kelley Creek open space.

**4.1476 Housing Variety (Pages 11-14 of the City Staff Report)**

*(C) Where the Master Plan is proposed that includes LDR-PV and MDR-PV residential sub-districts in the same project, the Plan may combine the densities of the two sub-districts when the following criteria are met:*

- (1) The LDR Housing Variety per section 4.1476 is met; and*
- (2) The MDR Housing Variety per section 4.1476 is met; or*
- (3) Other techniques found to be consistent with the purpose of this standard and*
- (4) The density does not exceed the maximum density allowed by the underlying residential sub-districts,*

**Response:** Staff found this standard had not been met “because the plan included the wetland (ESRA) areas in the density calculation.” Additionally, staff found that “new lots that would have their buildable areas for new development within the ESRA-PV sub-district is prohibited.”

The subject property is located within the LDR-PV and MDR-PV zoning districts. Per the Net Density definition in Article 3, net square footage is calculated by subtracting the Habitat Conservation Area, slopes over 25 percent, and public and private streets from the gross square footage areas. ESRA is also subtracted out for purposes of calculating density, with a density transfer from ESRA to developable areas allowed at a ratio of 1 additional unit per acre. The following table demonstrates the minimum and maximum density requirements for the subject property. The site plan was revised to avoid new lots from within ESRA-PV. As discussed elsewhere in this document and further detailed in the ESRA-PV Mitigation Plan Technical Memorandum, the ESRA-PV standards should not apply to the DSL-concurred wetlands for purposes of calculating density; therefore, DSL-concurred wetlands are not included in the density calculation

Density Calculations for Veranda at Pleasant Valley						
Zoning District	ESRA Area	Net Acreage	Min. Density	Max. Density	Min. Units	Max. Units

<b>LDR-PV</b>	10.23 acres	18.51 acres	5.3 units/acre	7.9 units/acre	98 units	146 units
<b>MDR-PV</b>	N/A	2.07 acres	12 units/acre	20 units/acre	24 units	41 units
<b>Total Site</b>	10.23 acres	20.58 acres	~~	~~	122 units	187 units
<b>Resource Area for Transfer</b>	<b>Acreage</b>		<b>Transfer Ratio</b>		<b>Additional Units Allowed (Optional)</b>	
<b>ESRA</b>	10.23 acres		1 unit per acre		10 units	
<b>Required Density Range</b>						
<b>Total Min-Max Units, ESRA Included</b>					<b>122-187units</b>	
<b>Total Potential Units Allowed</b>						
<b>Total Min-Max Units, ESRA + Density Transfer Included</b>					<b>132-197 units</b>	

As demonstrated by the updated Preliminary Plans, the planned subdivision includes 175 lots. As demonstrated by the table above, the planned number of units falls within the minimum-maximum density range when accounting for the public streets and ESRA, as required by the net density definition of Article 3. This requirement is met by the planned subdivision.

*(D) Except as provided in Subsection (C) each sub-district within a Master Plan shall meet the average minimum and maximum density standards required for the sub-district. However, within any particular area of a Master Plan the actual density may be less than the minimum or more than the maximum sub-district requirements.*

**Response:** Staff found that this standard was not met due to the previous density calculation not factoring for the ESRA on the subject property. As demonstrated in the response to Subsection (C) above, the updated subdivision plan meets the combined minimum and maximum density requirements for the LDR-PV and MDR-PV zoning districts on the subject property and accounts for the ESRA.

**4.1465 Neighborhood Transition Design Area Overlay Sub-district (Various)**

**Response:** Staff found that various standards of Section 4.1465 were not met because “compliance with the NTDA standards cannot be fully made because the proposal did not take into consideration the over 5 acres of wetland area on the site.”

As demonstrated by the updated Preliminary Plans and attached AKS ESRA-PV Mitigation Plan Technical Memorandum, this project preserves over 13 acres of ESRA-PV adjacent to Kelley Creek and the forested area within the southeast corner of the site. The project requires public streets, public trails, and an off-site stormwater facility within the ESRA-PV, as allowed by GDC Section 4.1437. On-site enhancement mitigation will be provided within the remaining ESRA-PV in accordance with GDC Section 4.1445. Pedestrian pathways within the ESRA-PV are not planned to be paved, as demonstrated by the updated Preliminary Plans and requested by the City in its previous review of the Preliminary Plans. For public streets within the ESRA-PV, the northern sidewalk along SW 44<sup>th</sup> Street will be replaced by an unpaved pedestrian pathway as requested in the City’s

staff report dated July 3, 2022 (File No. SD/MIS 20-26000343). Dwelling units along this public street are planned to face the ESRA-PV, placing eyes on and strengthening the neighborhood connection to the open space. The ESRA-PV will be protected within open space tracts.

As demonstrated by the updated Preliminary Plans, a portion of the mapped ESRA-PV on the subject property is located in the southeast corner of the property. This ESRA-PV designation is due to the tree canopy associated with the adjacent Metro property. Due to the unique topography, the property's geometry, and the planned layout of the subdivision, it is not logical or feasible to place a public street along the boundary of this ESRA-PV per GDC Section 4.1465. Section 4.1465 also calls for pedestrian ways along the ESRA where streets cannot be provided. Given the topography of this ESRA-PV and the presence of a trail on Metro property to the north of the subject property, a trail would not create a suitable transition between the ESRA-PV and the neighborhood. Additionally, any trail would need to dead end at the eastern property boundary and run along the southern property boundary; this configuration is unlikely to be supported by Metro, who owns the property to the south. Therefore, the updated Preliminary Plans include a fence along this ESRA boundary to protect the ESRA-PV from impacts from adjacent properties. This ESRA will be placed in an open space tract (Tract C as shown in the updated Preliminary Plans).

As demonstrated by the updated Preliminary Plans and as referenced above, the site plan creates transitions between the subdivision and the ESRA-PV on the subject property where required and appropriate. Impacts to the ESRA-PV are minimized and mitigation is planned exceeding at 2:1 enhancement-to-impact ratio for encroachment within the ESRA-PV.

**6.0010 Lot Arrangement (Page 21 of City Staff Report)**

*The lot arrangement shall be such that there will be no foreseeable difficulties, for reason of topography or other conditions, in securing building permits to build on all lots in compliance with the Gresham Development Code.*

**Response:** Staff found this standard had not been met because “until the wetland delineation issue and the other issues raised in this staff report are resolved, all lots proposed within the wetland areas may not be approved as proposed.”

As demonstrated by the updated Preliminary Plans and responses provided herein, the updated lot arrangement complies with the applicable code standards. The applicant revised the layout to remove lots from within mapped ESRA-PV, including the newly delineated ESRA-PV associated with the drainage along the eastern site boundary. The attached AKS ESRA-PV Mitigation Plan Technical Memorandum provides documentation to demonstrate how ESRA-related standards and mitigation are met as applicable. We request the City condition approval upon receiving all necessary federal and state wetland permits. These regulations minimize and control the loss of wetland functions, requiring detailed analysis of how the project design has minimized wetland impacts and how wetland functions lost will be replaced. Wetland area mitigation will occur in accordance with GDC Section 4.1445.E, which requires functional and area replacement standards



established by USACE and DSL in conjunction with a wetland fill permit. The applicant owns properties located within the Kelley Creek and Johnson Creek watersheds where meaningful wetland mitigation can occur. The applicant understands responsible mitigation in accordance with federal and state mitigation standards will be required prior to any encroachment within DSL-regulated wetlands.

**6.0011 Residential District Lot and Parcel Configuration (Pages 21-22 of City Staff Report)**

*(A) Subdivision lots and partition parcels created through the subdivision and partition process shall be rectilinear. Irregular shaped subdivision lots and partition parcels are not allowed, except at the discretion of the Manager when based upon existing parent lot shape. Exceptions shall not be granted to comply with minimum lot size requirements or minimum setback requirements for existing structures.*

**Response:** As demonstrated by the updated Preliminary Plans, the planned subdivision lots meet the standards of this section. Lots are predominantly rectilinear with side lot lines perpendicular to frontage streets or radial to curved streets where applicable. To the degree that irregularly shaped lots are present, they are necessary due to the property's existing geometry and natural features (e.g., ESRA-PV).

**Response to Transportation Findings Not Met**

**Master Plan**

**4.1475(C)**

*This standard can be met with a connection to the Kelley Creek Trail and a condition to reduce the large block bounded by Streets E, F and G.*

**Response:** As discussed in the response pertaining to GDC Section 4.1475 above and the updated Preliminary Plans, a pedestrian pathway crossing over Kelley Creek is planned through mapped ESRA-PV in the northern portion of the property to facilitate a connection to the Kelley Creek Trail on adjacent property to the north. The block bound by SW Eastwood Avenue, SW 47<sup>th</sup> Street, and SW 45<sup>th</sup> Street provides improved transportation options by including a mid-block pedestrian connector to reduce the block length for pedestrians.

**4.1475(D)**

*There is no condition which could be applied to meet the standards of this section because of the proposed wide-ranging impacts to the natural resources on site and the various street layout options the applicant can make to avoid them.*

**Response:** As discussed elsewhere in this document and shown in the updated plans and attached AKS ESRA-PV Mitigation Plan Technical Memorandum, impacts to mapped ESRA-PV meet all standards listed under Section 4.1430. The updated layout removes lots from within mapped ESRA-PV. The updated layout reduces tree removal and minimizes ESRA-PV impacts as much as possible which reduces the number of lots over previous layout submittals. The soft surface trail crossing ESRA-PV in the north was realigned to avoid tree removal. The existing condition of the ESRA-PV impacts consist of low-functioning resources generally dominated by non-native grasses or invasive Himalayan blackberry. The planned mitigation will provide a direct improvement to water temperature within Kelley Creek through enhancement of over 12-acres of existing ESRA-PV along Kelley Creek. Wetland mitigation will occur in accordance with state mitigation standards which

require replacement of lost functions within the watershed. As documented in the attached AKS ESRA-PV Mitigation Plan Technical Memorandum, the project will provide an overwhelming net ecological benefit to the local watershed over existing conditions.

#### 4.1479

*The conformance with block length within the proposed subdivision does not meet standards for the NW block bounded by Street H, Street C, and Street G and is discussed further in Street Plan below.*

**Response:** As demonstrated by the updated Preliminary Plans, the northwest block bound by SW Tegart Avenue, SW 45<sup>th</sup> Street, and SW 44<sup>th</sup> Street includes a mid-block pedestrian connection to facilitate improved transportation options for pedestrians. Further findings pertaining to this section can be found elsewhere in this document.

#### Street Plan

*As the length of Street E is over 400 feet it is classified as a Green Transitional Street and needs to dedicate 56-feet of right of way.*

**Response:** As demonstrated by the updated Preliminary Plans, SW Eastwood Avenue has a planned right-of-way width of 56 feet.

*The applicant is showing a pedestrian path for the NE block and will need to add a pedestrian path to the NW block.*

**Response:** As discussed in findings pertaining to Section 4.1479 above and demonstrated by the updated Preliminary Plans, a mid-block pedestrian path is planned for the northwest block bound by SW Tegart Avenue, SW 45<sup>th</sup> Street, and SW 44<sup>th</sup> Street.

*As the block [bound by Streets E, F, and G] currently creates two block lengths over 530 feet and has a perimeter of over 2000 linear feet, which is above the allowable block length and perimeter length in A5.402(D), the block will need to be made smaller if possible. There appears to be an area west of lots 70 and 52 where a connection would be approximately 10% slope. This location would meet City requirements for local street slopes and reduce the block length. This standard can be met with a condition.*

**Response:** As demonstrated by the updated Preliminary Plans, a mid-block pedestrian path is planned for the block described above to facilitate improved transportation options for pedestrians. Due to topographic constraints on the subject property, decreasing the block size is not feasible in this area. SW 47<sup>th</sup> Street and SW 45<sup>th</sup> Street are planned to end at the eastern boundary of the subject property and include turnarounds for emergency and service vehicles. SW 47<sup>th</sup> Street and SW 45<sup>th</sup> Street are designed to facilitate a future block connection in the adjacent property to the east when that property is improved. To the degree that additional mid-block connections are desired by City staff, they can be addressed in conditions of approval.

#### Frontage Improvements

*Streetlighting with LED fixtures must be provided on all public street frontages at an appropriate spacing based on each street's classification, per Section 6.02.14 of the PWS. A streetlight plan, including a preliminary plan showing the connection to Portland General Electric's (PGE's) current*



*system must be submitted with the construction plans at the time of building permit review. Street trees need to be installed along all frontages in accordance with PWS 6.02.15 and GCDC 9.0123.*

**Response:** It is understood that a street lighting plan will be required upon submittal of construction plans at time of building permit review. It is understood that street trees will also need to be shown on construction plans. As demonstrated by the updated Preliminary Plans, adequate spacing is provided along public streets for streetlights and street trees as applicable.

#### **Traffic Impact Analysis**

*The study found intersection capacity issues at the intersections of SE 190th Drive & SE Richey Road and SE Foster Road & SE Richey Road, and standards can be met with a condition for improvements.*

**Response:** This requirement is understood, and any required improvements can be met with conditions of approval.

#### **Response to Development Engineering Comments**

##### **9.0520, 9.0521, and A5.200: SURFACE WATER MANAGEMENT SYSTEMS**

*Please note that the approval for the centralized or regional stormwater facility to be located on the north side of Kelley Creek on the Panza property is for this application only, in consideration of the 2019 pre-application comments; if this land use application does not move forward, this approval will not be grandfathered to future applications outside the master planned stormwater sub-basin for the Panza facility.*

**Response:** As demonstrated by the updated Preliminary Plans, stormwater management is planned to be provided by way of a new stormwater facility on Tax Lot 400 of Clackamas County Assessor's Map No. 1S 3E 20C (referred to as the "Panza property"). An underground stormwater main on the subject property is planned to direct stormwater from the subdivision to the new facility. This stormwater facility is planned to accommodate this subdivision. Encroachments into the ESRA-PV for the new stormwater facility is considered allowed per GDC Section 4.1437.D. On-site enhancement mitigation meeting mitigation standards set forth within Section 4.1445 compensate for the allowed ESRA-PV encroachment for the stormwater facility. The stormwater facility and outfall will be designed to avoid impact within Kelley Creek, associated wetlands, and minimize tree removal as much as practical. There are no alternatives to the location of the facility outside of ESRA-PV, as ESRA-PV is mapped throughout the majority of the Panza property. The stormwater facility is positioned as far away from Kelley Creek as practical.

#### **EASEMENTS AND OTHER**

*8-foot wide General Utility Easements shall be provided along all public street frontages prior to final subdivision plat approval.*

**Response:** As demonstrated by the updated Preliminary Plans, 8-foot-wide General Utility Easements are planned around all public street frontages in the planned subdivision. It is understood that these easements will need to be provided prior to final plat approval.



*All existing and proposed public and private easements must be shown on the construction plans submitted for building permit review. In general, all proposed easements must be in place prior to construction plan approval.*

**Response:** Existing and planned easements are shown on the updated Preliminary Plans as required by this section. It is understood that all easements must be in place prior to construction plan approval.

#### Response to Addressing Comments

*For the plat, please make the following adjustments:*

- *Label STREET A as SW SANDLEWOOD AVENUE*
- *Label STREET B as SW REDFERN AVENUE*
- *Label STREET C as SW TEGART AVENUE*
- *Label STREET D as SW BRIXTON AVENUE*
- *Label STREET E as SW EASTWOOD AVENUE*
- *Label STREET F as SW 47TH STREET*
- *Label STREET G as SW 45TH STREET*

**Response:** As demonstrated by the updated Preliminary Plans, streets are labeled in accordance with these requested adjustments.

#### Response to Fire Department Comments

*The turning radius for all emergency apparatus roads shall be: 28' inside and 48' outside radius. This must be indicated. OFC 503.2.4*

**Response:** As demonstrated by the updated Preliminary Plans, emergency vehicle turnarounds are included with the Preliminary Plans and meet the standards of this section.

*The location of the fire hydrants are not indicated on the plans. A fire hydrant must be within 600 feet of the furthest point around the furthest home. This is measured as the fire hose lies on the ground.*

**Response:** This requirement is understood. Fire hydrants are planned to be shown on the final construction plans. This requirement can be addressed by conditions of approval.

*Where a fire hydrant is installed the access road must be a minimum of 26'. OFC APP D-103.1*

**Response:** As demonstrated by the updated Preliminary Plans, access roads are a minimum of 26 feet where fire hydrants are installed.

*All Fire Dept. Access Roads shall be drawn to scale and shown clearly on plans. The access roads shall be constructed and maintained prior to and during construction. The minimum width is required to be 20'. OFC 503.2.1 & D103.1*

**Response:** Access roads for emergency vehicles are shown and drawn to scale on the updated Preliminary Plans. The minimum width of access roads is demonstrated to be greater than 20 feet. It is understood that access roads must be constructed and maintained prior to and during construction.

*Due to the fact that there are more than 30 dwelling units, this subdivision will be required to have two separate approved fire access roads and shall meet the requirements of D104.3. OFC D107.1*



**Response:** Separate fire apparatus roads are shown on the updated Preliminary Plans as SW 45<sup>th</sup> Street and SW 47<sup>th</sup> Street, respectively.

*Temporary dead ends that exceed 150ft due to this being a phased plan will need to be equipped with approved temporary turnarounds until the roads re completed and finished with phase 3. OFC App D*

**Response:** This requirement is understood and can be met prior to and during construction.

**Response to Recycling and Solid Waste Comments**

*Applicant must allow for enough turn around space for a refuse truck to turn around safely in the proposed 'eyebrows.' No parking signs must be placed in the eyebrows to prevent blockage. If this cannot be accommodated, Street F must make a connection with Street G on the east side of the development.*

**Response:** Service and emergency vehicle turnarounds depicted on the updated Preliminary Plans provide sufficient turnaround space for these vehicles. It is understood that no parking signs must be placed in the eyebrows; signs can be placed prior to the eyebrows.

*Trucks need direct safe turn around or exit with 52 foot turning radius.*

**Response:** As demonstrated by the updated Preliminary Plans, turnarounds with a minimum 52-foot radius are provided for service trucks.