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March 5, 2026

BY: EMAIL

Multnomah County Land Use Planning
1600 SE 190th Ave
Portland, OR 97233
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RE: T2-2025-0046 Public Hearing Materials

To Whom It May Concern:

On behalf of the applicant, please find enclosed the following documents.

1. Applicant's Response to Public Comment
2. Applicant's Presentation for March 6, 2026 Public Hearing (pdf for the record)

Best Regards,



Zoe Lynn Powers

On behalf of the applicant, this memorandum responds to public comments entered into the land use record for T2-2025-0048 prior to the Multnomah County March 6, 2026, Public Hearing.

Cottrell CPO Notice of Appeal for T2-2025-0046

2. What are your objections to the decision? (State the specific grounds for the appeal, i.e. criteria or standard)

Decision fails to adequately address: MCC 39.1250 (MUA-20); MCC39-6235 (stormwater drainage control); MCC39.6850(dark sky lighting standards);MCC39.5085(Geologic Hazard); MCC 39.431(A); MCC 39.4325 Applicant is in clear violation of T2-2024-0060 Conditions of Approval. Decision fails to address SEC-h overlay and SEC-wr overlay.

The Notice of Appeal asserts that the decision “fails to adequately address” the following code sections and provides the following comments. Each is addressed in turn below.

1. MCC 39.1250 (MUA-20)

Applicant Response: The temporary office trailers are placed to comply with the required minimum setback standards as demonstrated in Exhibits A.3 and A.4. All trailers are 16 feet in height as shown in Exhibit A.5 and do not exceed the maximum height standard of 35 feet in the zone. Therefore, these standards are met.

2. MCC 39.6235 (stormwater drainage control)

Applicant Response: The applicant provided a Stormwater Drainage Control Certificate (signed by a Registered Professional Engineer licensed in Oregon) demonstrating compliance with the County’s stormwater requirements under case #T2-2024-0060. Since the submitted site plans for T2-2024-0046 remained unchanged, and therefore consistent with the existing Erosion and Sediment Control Permit (T1-2023-16571) for the site, compliance with ground disturbance and stormwater requirements remain fully addressed. This standard is met.

3. MCC 39.6850 (dark sky lighting standards)

Applicant Response: All temporary construction office trailers at the filtration site are either fitted with lighting per the submitted lighting detail or lighting is shielded to comply with dark sky lighting standards. The photos below provide examples of the two types of lighting. Therefore, this standard is met.

Photos 1 and 2: Trailers fitted with downlit or screened lighting at site



4. MCC 39.5085 (geologic hazard)

Applicant Response: The proposed office trailers are located entirely outside of all geologic hazard areas as shown in Exhibits A.3 and A.4. These standards are not applicable.

5. MCC 39.431(A)

Applicant Response: It is unclear what code section the appellant intended to refer to with this incomplete citation. It appears to be a reference to:

§ 39.4315 REVIEW USES. The following uses may be permitted when found by the approval authority to satisfy the applicable standards of this Chapter.

(A) Temporary uses when approved pursuant to MCC 39.8700 and 39.8750.

The proposed temporary use was approved pursuant to the applicable code provisions in MCC 39.8750. The Notice of Appeal does not explain how the decision fails to adequately address this section.

6. MCC 39.4325

Applicant Response: This code section refers to the MUA-20 Dimension Requirements and Development Standards. As explained in the County's memo to the Hearings Officer, these standards are met.

7. "Applicant is in clear violation of T2-2024-0060 Conditions of Approval."

Applicant Response: It is unclear what the appellant means by "the applicant is in clear violation of T2-2024-0060 Conditions of Approval." The applicant obtained the required

Temporary Use Permits from Multnomah County to use the existing construction office trailers at the filtration site pursuant to County approvals T2-2024-0060 and T2-2025-0046.

8. “Decision fails to address SEC-h overlay and SEC-wr overlay.”

Applicant Response: The proposed temporary use is located entirely outside of all SEC areas. These standards are not applicable.

Comments received during the 14-day Public Comment Period

Comment 1: Exhibit D.1: Ciecko comments dated October 17, 2025

Just today I became aware of 2 new land use applications related to the PWB. One having to do with creation of a parking area for 400 vehicles and large “lay down” areas within a variety of special resource areas and another related to the placement of numerous construction trailers. I also became aware that the final day for the scant 2 week public comment period is tomorrow, October 17.

Response to Comment 1: This comment concerns a different land use case (T2-2025-0034) related to parking and lay down areas, which had a similar public comment period. The subject case in this proceeding, T2-2025-0046, is a wholly separate application and considers approval of temporary construction trailers at the filtration site. The temporary office trailers are not located in any SEC or Geohazard overlay zones.

Comment 2: Exhibit D.2: Cottrell CPO comments dated October 17, 2025

The Cottrell Community Planning Organization (CPO) and Pleasant Home Community Association are objecting the approval of the Case files: T2-2025-0034 and T2-2025-0046. These applications show that the proposed actions are situated within steep slope Sec Geologic Hazard Areas, and directly adjacent to Sec-Habitat overlays. We are particularly concerned about stormwater run-off, the integrity of the banks, and the impact to natural resources and the wildlife corridor. The notices for these files lack adequate information pertaining to the applicable approval criteria listed on the proposals. For example, one of the applicable approval criteria is MCC 39.680 Dark Sky Light Standards, yet the site plan maps do not indicate new lighting plans for these proposed parking and laydown areas.

Response to Comment 2: These comments primarily concern a different land use case (T2-2025-0034) related to parking and lay down areas, which had a similar public comment period. The subject case in this proceeding, T2-2025-0046, is a wholly separate application and

considers approval of temporary construction trailers at the filtration site. The temporary office trailers are not located in any SEC or Geohazard overlay zones.

With respect to compliance with MCC 39.680 Dark Sky Light Standards, as demonstrated in the prior approval for these trailers (T2-2024-0060) and in this application (T2-2025-0046) the temporary office trailers at the filtration site are either fitted with lighting per the submitted lighting detail on file with the County or lighting is shielded to comply with dark sky lighting standards.

Comment 3: Exhibit D.3: Chris Courter comments dated October 17, 2025

Concerning the proposal to construct a 400 space parking area and several large "lay down areas" at the northern edge of the PWB filtration construction site: The area in question is known to be a geologically sensitive area. We'd been told in the past, during the application and "good neighbor" meetings that the PWB would not be using these areas as they were restricted from doing so. At the risk of damaging the hillside, and causing significant environmental damage to the area, I oppose authorizing any such permit. There would be major water resources involved (SEC-wr). In addition, Wildlife habitat would be compromised (SEC-h).

Response to Comment 3: These comments concern a different land use case (T2-2025-0034) which had a similar public comment period, but is unrelated to the subject case on appeal, T2-2025-0046. Therefore, these comments are not relevant. The temporary office trailers are not located in any SEC or Geohazard overlay zones.

Comment 4: Exhibit D.4: Suzanne Courter comments dated October 17, 2025

This is my official letter in opposition to your approval of file case T2-2025-0046 for temporally locating offices on the Portland Water Bureau construction site on Carpenter Lane. This site is in MUA-20 agricultural land with overlays of "Significant Water Resources (SEC-wr), Significant Wildlife Habitat (SEC-h) and Geologic Hazard (GH) requiring conditional use permitting. There were other indications on your submitted diagrams that you intend to add more changes to your original land use permit. I heavily oppose you slyly sneaking changes in to the existing plan.

Response to Comment 4: These comments appear to concern concern a different land use case (T2-2025-0034) related to parking and lay down areas, which had a similar public comment period. The subject case in this proceeding, T2-2025-0046, is a wholly separate application and considers approval of temporary construction trailers at the filtration site. The temporary office trailers are not located in any SEC or Geohazard overlay zones. No changes are proposed to the previously approved site plan. Therefore, these comments are not relevant.



Bull Run
FILTRATION
PROJECTS

*Our water: safe and abundant
for generations to come.*

PORTLAND WATER BUREAU

Bull Run Filtration Projects

Temporary Permit for Placement of
Construction Office Trailers

T2-2025-0046 (35320 Carpenter Ln)

March 6, 2026 9 a.m.

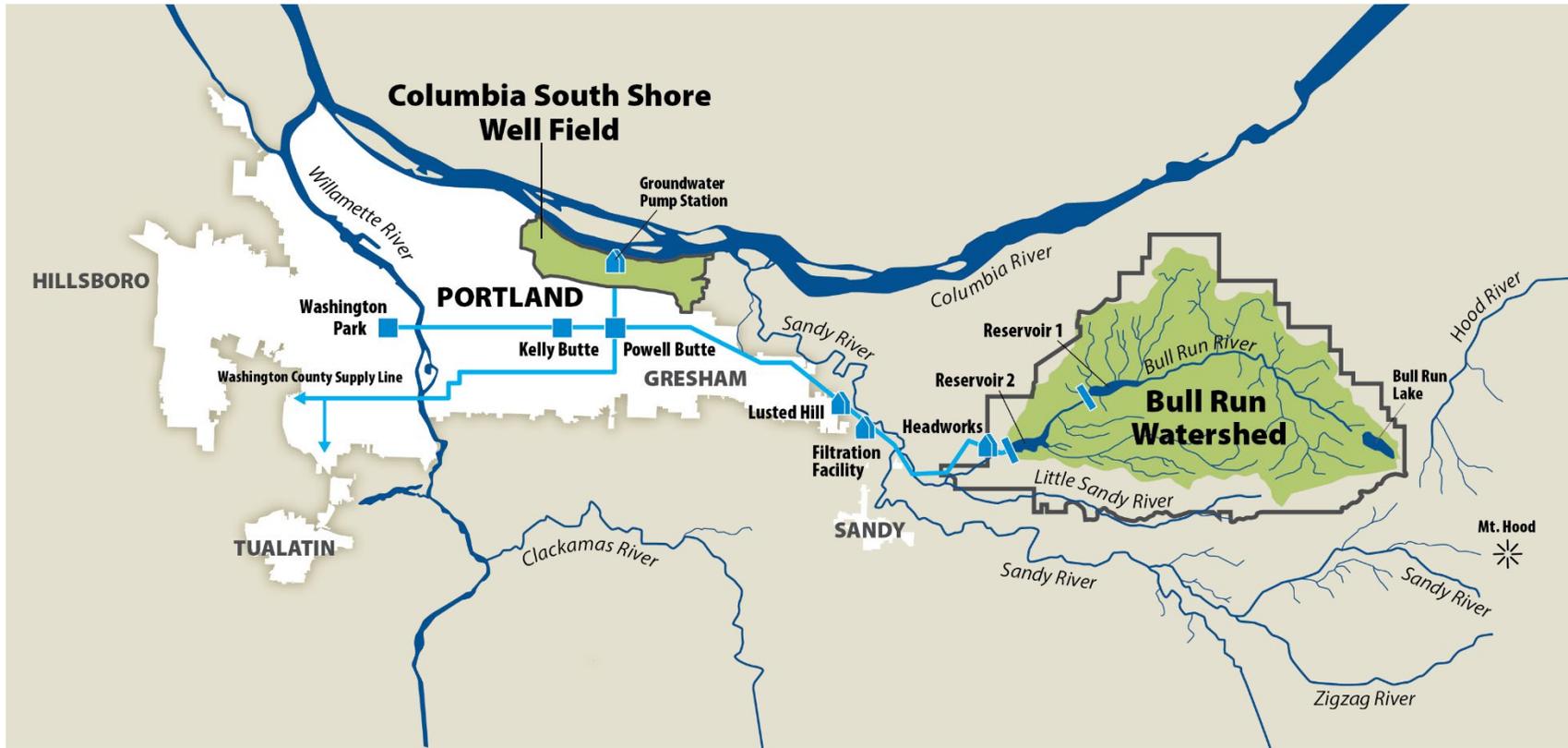


Agenda

- Project Overview
- Requested Permit
- Key Topics



Thanks to thoughtful planning, Bull Run has been a source of excellent water since 1895



- Serves almost 1 million people
- Serves the City of Portland and 19 wholesale customers
- Uses 100 million gallons of water on an average day



Filtration Facility



Filtration Pipelines



Filtration Facility Construction Site

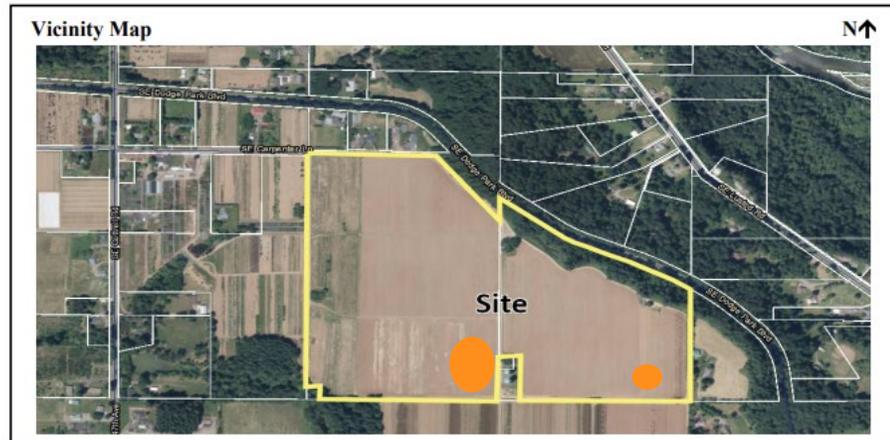


February 2026

Construction Trailer Locations

Filtration Facility Construction Site

35320 SE Carpenter Ln, Gresham



Applicable Approval Criteria

- General Provisions: MCC 39.1250 Code Compliance and Applications, MCC 39.2000 Definitions, MCC 39.3005 Lot of Record – Generally, MCC 39.3005 Lot of Record – MUA-20, MCC 39.6235 Stormwater Drainage Control, MCC 39.6850 Dark Sky Lighting Standards
- Multiple Use Agriculture – 20 (MUA): MCC 39.4315(A) Review Uses - Temporary Uses, MCC 39.4325 Dimensional Standards and Development Requirements
- Temporary Permits for Certain Uses: MCC 39.8750(A) Temporary Permits for Certain Uses

Office Trailer Placement

- Trailer placement is consistent with the approved site plan and ESC Permit
- Trailer placement meets all MUA-20 dimensional and development requirements (i.e., setbacks, height)



Photo of trailer location as of February 2026

Dark Sky Lighting

- All trailer lighting is down-lit or shielded and complies with dark sky requirements



Sewage and Stormwater Compliance

- Temporary septic tanks are pumped/maintained regularly
- Stormwater Drainage Control Certificate signed by a Registered Professional Engineer licensed in Oregon demonstrates compliance with the County's stormwater requirements
- Site plans for T2-2024-0060 (original approval of these trailers) and T2-2025-0046 (this application) are consistent with the approved Erosion and Sediment Control Permit (T1-2023-16571)

No Impacts within Overlays (SEC-h and GH)

- Trailers are outside of designated Special Environmental Concern (SEC) and Geohazard (GH) overlays onsite



Image from Multnomah County Staff Report



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*Our water: safe and abundant
for generations to come.*

Thank you!

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