



To: Multnomah County Hearings Officer
1600 SE190th Ave
Portland, OR 97233
LUP-Comments(a)multco.us

From: Cottrell Community Planning Organization
Pleasant Home Community Association
PO Box 1411
Boring OR 97009

3/13/2026 (~~revised 3/25/2026~~)

RE: Testimony Opposing Approval of Temporary Permit Application T2-2025-0046 and T2-2025-0048

The Cottrell Community Planning Organization (CPO) and the Pleasant Home Community Association (PHCA) respectfully submit this testimony in opposition to the approval of Temporary Permit Applications T2-2025-0046 and T2-2025-0048.

At the March 6, ~~2025~~ 2026 hearing, the lighting installed on the temporary trailers was discussed and photographs of the fixtures were presented. During that discussion, Ms. Powers and Mr. Farley stated that the lighting complied with Multnomah County Code (MCC) 39.6850, the County's "Dark Sky Lighting Standards." The photographs presented at the hearing depicted fixtures described as shielded and directed downward in accordance with the code. In addition, the photos were taken during the day and does not represent all lighting types present at both sites.

Photographs taken on Saturday, March 7, ~~2025~~ 2026, at approximately 7:31 p.m. (Figure 1) and 7:37 p.m. (Figure 2) appear to show conditions inconsistent with those representations. These photographs were taken from Bluff Road looking north. The first image shows the temporary trailer site to the east near the pipeline portal, and the second image shows the trailer site located to the west, or left of the water towers.

MCC 39.6850 is intended to minimize light pollution and protect surrounding properties from glare and light trespass. The code requires that exterior lighting be fully shielded and directed downward so that illumination is confined to the project site and does not spill onto adjacent properties or into the night sky.

The attached photographs indicate that lighting associated with the temporary trailers is producing substantial glare and light spill beyond the boundaries of the site. The lighting appears to project outward toward neighboring properties and creates visible glare comparable to vehicle



headlights that can be observed from considerable distances. These conditions strongly suggest that the fixtures are not adequately shielded or directed downward as required by MCC 39.6850.

The CPO and PHCA are also concerned that these lights remain illuminated throughout the night. According to the permit, approved work hours are from 7:00 a.m. to 6:00 p.m. If the lighting is intended for construction activities, it should not remain illuminated well after work hours have concluded. Continued nighttime illumination is inconsistent with the intent and purpose of MCC 39.6850, which is to minimize unnecessary light pollution and protect surrounding rural and natural areas.

Based on the photographic evidence and observed site conditions, the lighting at the temporary trailer sites raises serious and unresolved questions regarding compliance with the shielding, glare reduction, and light trespass limitations required under MCC 39.6850.

Accordingly, the Cottrell Community Planning Organization and the Pleasant Home Community Association respectfully request that the Hearings Officer require the applicant to demonstrate full compliance with MCC 39.6850 prior to approval of the temporary permits. At a minimum, this should include verification that all exterior lighting is fully shielded and directed downward, that fixtures are adjusted or replaced to eliminate glare and light trespass onto neighboring properties, and that non-essential lighting is extinguished outside of approved work hours.

Sincerely,

Cottrell Community Planning Organization

Pleasant Home Community Association



Figure 1. Photograph from SE Bluff Rd looking north, taken on Saturday, March 7, 2025 ~~2026~~, at approximately 7:31p.m, directly east of the Pleasant Home Water District water towers adjacent to the raw water portal.



Figure 2. Photograph from SE Bluff Rd looking north, taken at approximately 7:37 p.m on March 7, 2026. Red arrows show the extent of the construction trailers at the filtration site directly west of the Pleasant Home Water District water towers.