



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

3/20/2026

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

Dear Hearings Officer,

We submitted an official code compliance complaint on March 20 (attached with this submittal) regarding ongoing violations associated with the Bull Run Filtration Project and its associated pipelines. We appreciate the contractor's response provided in Exhibit I.10 for T2-2025-0046; however, it does not adequately address the violations identified in our complaint or provide sufficient information to determine compliance with Multnomah County Code.

The contractor makes broad assertions that all lighting supporting the construction trailers is fully shielded and directed downward, with no light emitted above the horizontal plane. However, no supporting documentation has been provided. There is no fixture schedule, photometric analysis, manufacturer specifications, or field measurements to verify these claims. As a result, the statements are unsubstantiated and cannot be independently evaluated.

The contractor's claims are also inconsistent with documented site conditions. As shown in our submitted materials, light sources are visible from off-site locations, light trespass affects neighboring properties, and fixtures appear improperly shielded or oriented. These observations directly contradict the assertion that all lighting is fully compliant.

Finally, the statement does not demonstrate compliance with MCC 39.6850. General claims about shielding and direction do not establish adherence to Dark Sky standards, nor does the assertion that lighting is "contained within the subject property" address light trespass beyond property lines.



For these reasons, the record remains incomplete and does not provide an accurate representation of actual site conditions. We respectfully reiterate our request for a comprehensive nighttime inspection and a full evaluation of all on-site lighting to ensure compliance with applicable code requirements.

Sincerely,
Cottrell Community Planning Organization
Pleasant Home Community Association