



To: Multnomah County Land Use and Transportation,
Code Compliance Program

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

3/20/2026

RE: Code Violations – Bull Run Filtration Project and Associated Pipelines

Dear Code Compliance Officer,

The Cottrell Community Planning Organization and Pleasant Home Community Association are submitting a formal complaint regarding ongoing violations of Multnomah County Code (MCC) associated with the Bull Run Filtration Plant and its association Pipeline Project.

1. Violation of MCC 39.4325(J)

MCC 39.4325(J) requires that temporary uses comply with all applicable provisions of the Multnomah County Code, including operational and development standards.

The construction sites of the Bull Run Filtration Project and associated Pipelines – specifically at 35320 SE Carpenter Lane and 36800 and 36910 SE Lusted Rd, respectively – and its temporary trailers with associated uses authorized under permits T2-2025-0046 and T2-2025-0048 are not in compliance with this requirement. Specifically, current operations fail to meet applicable standards governing site conditions and lighting, as outlined below.

Because MCC 39.4325(J) mandates full compliance with all relevant code provisions, any violation of lighting or other applicable regulations constitutes a direct violation of this section.



2. Violation of MCC 39.6850 – Dark Sky Lighting Standards

MCC 39.6850 establishes lighting requirements intended to minimize glare, light trespass, and skyglow, and to preserve the rural nighttime environment.

Lighting associated with the Bull Run Filtration Plant—including, but not limited to, lighting on temporary trailers authorized under permits T2-2025-0046 and T2-2025-0048—does not comply with these standards. Observed issues include:

- Unshielded or inadequately shielded fixtures, resulting in visible light sources from off-site locations (FIGURE 1, FIGURE 2)
- Light trespass onto adjacent residential and rural properties (FIGURE 3, FIGURE 4)
- Illumination levels that exceed those appropriate for a rural setting (FIGURE 5)
- Improper fixture orientation, with lights not directed downward as required (FIGURE 3)
- Continuous or unnecessary nighttime lighting beyond what is needed for safety or security (FIGURE 4, FIGURE 6, FIGURE 7)

These conditions are inconsistent with both the intent and requirements of MCC 39.6850 and represent ongoing violations of the County’s Dark Sky standards.

3. Site-Wide Lighting Noncompliance – Bull Run Filtration Plant

These lighting violations are not limited to the temporary trailers but extend across the entire Bull Run Filtration Plant site. The cumulative effect of site-wide lighting results in:

- Significant degradation of the rural nighttime environment
- Widespread light trespass affecting neighboring properties
- A pattern of noncompliance indicating a broader failure to adhere to County lighting regulations

This demonstrates that the project as a whole is not operating in compliance with MCC 39.6850 and is therefore also in violation of MCC 39.4325(J).

Requested Action

We respectfully request that Multnomah County Code Compliance:

1. Conduct a comprehensive nighttime inspection of the Bull Run Filtration Plant, including all temporary trailer areas
2. Evaluate all on-site lighting for compliance with MCC 39.6850
3. Review compliance of Temporary Use Permits T2-2025-0046 and T2-2025-0048 with MCC 39.4325(J)



4. Require immediate corrective actions, including shielding, reorientation, or removal of noncompliant lighting
5. Impose enforcement measures, including potential suspension or revocation of permits, if compliance is not achieved
6. Ensure that any new or pending permit applications associated with this project (e.g. T2-2025-0046 and T2-2025-0048) are not approved or processed until a thorough investigation is completed and all current violations have been fully remediated.

Thank you for your attention to this matter. Please notify us of any findings, compliance actions, or enforcement proceedings related to this complaint.

Sincerely,

Cottrell Community Planning Organization

Pleasant Home Community Association



Figure 1. Visible bright lights from across the Sandy River canyon to the east from a residence in the town of Aims on March 9th prior to approved construction hours of 07:00 am



Figure 2. Visible bright lights from across the Sandy River canyon to the east from a residence in the town of Aims on March 9th prior to approved construction hours of 07:00 am



Figure 3. Light positioned in a non-downward fashion near the raw water portal on the Bull Run Filtration site immediately adjacent to residential property (photo take March 7, 2026)



Figure 4. Lights shining from the raw water portal location on the Bull Run Filtration site immediately adjacent to residential property. Photo taken March 2, 2026 prior to approved construction hours at approximately 06:00 am



Figure 5. Illumination from SE Carpenter Lane directly in front of residential property outside of approved construction hours, March 2026 at approximately 09:00 PM.



Figure 6. Photograph from SE Bluff Rd looking north, taken at approximately 7:37 p.m. Red arrows show the extent of the construction trailers at the filtration site directly west of the Pleasant Home Water District water towers.



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