



Request for Review: Honey Bucket Interpretation

INT25-0001

September 22, 2025

Issue Before Council

Consideration of an appeal filed by the applicant of a staff interpretation decision, INT25-0001, issued on July 11, 2025.

- Approval of Appeal = Confirms the applicant's interpretation of the Tualatin Development Code
- Denial of Appeal = Confirms staff's interpretation of the Tualatin Development Code



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Subject Site



The site is located at 18805 SW 108th Avenue

- Comprised of 3 Tax Lots: 2D122AD 600, 700 and 800
- 3.8-acres
- Access from SW 108th Avenue
- Light Manufacturing (ML) Planning District

The purpose of the ML zone is to provide suitable areas for light industrial uses and limited supportive commercial activities, while buffering residential and commercial areas from heavy manufacturing and prohibiting hazardous or environmentally adverse operations.



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Subject Site



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Background



Code Enforcement Investigation: **October 2024**

Formal Request for Interpretation Submitted: **June 11, 2025**

Honey Bucket Interpretation
(INT25-0001) Issued: **July 11, 2025**

Request for Review of INT25-0001 Decision
Submitted: **July 24, 2025**

Public Notice: **August 25, 2025**

City Council Hearing: **September 22, 2025**



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TDC 60.200 – Use Categories in the ML Zone

Use Category	Status	Limitations and Code References
Solid Waste Treatment and Recycling	C (L)	Conditional uses limited to recycling collection center.
Wholesale Sales	P/C (L)	<p>Permitted uses limited to:</p> <ul style="list-style-type: none">• Sales of industrial hand tools, industrial supplies such as safety equipment and welding equipment, that are products primarily sold wholesale to other industrial firms or industrial workers; and• Sale, service and rental of construction and industrial equipment to contractors and industrial firms only. <p>Conditional use required for wholesale sales of building materials and supplies</p>



INT25-0001 Honey Bucket Interpretation



INT25-0001 Applicant Submission:

- The Applicant stated that the primary onsite activity is the loading/unloading, washing, and storing of portable restrooms and other industrial equipment rented from the site.
- The Applicant asserted that its primary use at the site (rental of portable restrooms and other industrial equipment to other businesses) is best characterized as a Wholesale Sales use, and that the waste-related components of the use are ancillary and accessory to the primary use.

INT25-0001 Staff Determination:

- Honey Bucket's primary use most closely aligns with the Solid Waste Treatment and Recycling use category.
 - Activities include:
 - Collection, storage, and washing of portable toilets onsite
 - Temporary waste storage onsite
- The activities are essential to the proposed use, not incidental. In the ML zone, the Solid Waste Treatment and Recycling use is limited to a recycling collection center. The existing use is prohibited.



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The applicant argued that the onsite uses align with the Wholesale Sales Use. In the interpretation request narrative (Exhibit B), when describing the aspects of its business, Honey Bucket asserted the following:

- Honey Bucket's business typically operates between 4 AM and 7PM- but may operate seven days a week with extended hours to accommodate demand surges or peak season events;
- After use by commercial and industrial customers, waste is pumped out of all units offsite before the restrooms are retrieved for cleaning and storage at the Site;
- Trucks that empty the restrooms of waste offsite return to the Site, where the pumped waste is stored temporarily in a holding tank;
- An additional truck empties the tank and delivers the waste to a final offsite destination for disposal
- Once at the Site, employees service the restrooms by washing units inside and outside via a closed loop wash water reuse station that reclaims and recycles water into a private reclamation system;
- Honey Bucket pumps the recycled water with one of its delivery trucks and disposes of it in an approved wastewater facility;
- Employees stock and load clean restrooms with necessary supplies and store them onsite.



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INT25-0001 Staff Determination



- Honey Bucket's primary use most closely aligns with the Solid Waste Treatment and Recycling use category.
- In the Light Manufacturing (ML) zone, the Solid Waste Treatment and Recycling use is limited to a recycling collection center.
- TDC 39.420(2), lists "portable toilet collection, storage and pumping" as an example of the specific subtype of uses within that category. Honey Bucket receives solid waste materials, which is a listed characteristic that defines the Solid Waste Treatment and Recycling use classification.
- The use in question does not pump the portable toilets onsite, it does collect, store, and wash the toilets onsite, as well as, temporarily store the waste from those toilets onsite.
- The proposed rental of portable restroom units, as well as, the temporary waste holding tank, as it is associated with the use, are both prohibited in the ML zone.



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INT25-0001 Staff Determination Cont.

- Staff noted the Light Manufacturing (ML) Use Category Table 60-1, further limits the Wholesale Sales use category to sales of industrial hand tools, industrial supplies such as safety equipment and welding equipment, that are products primarily sold wholesale to other industrial firms or industrial workers; and sale, service and rental of construction and industrial equipment to contractors and industrial firms only; and further that a conditional use is required for wholesale sales of building materials and supplies.
- The Applicant's operation includes activity (receiving solid waste materials) that is not permitted in the Wholesale Sales Industrial Use Category.
- The interpretation, concluded that the existing portable toilet collection and associated holding tank, and the proposed rental of shower units; temporary fence panels (fencing); temporary metal storage containers; and ground-level office units are both prohibited uses within the ML Zone.



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Request for Review/Appeal



Party Requesting the Appeal

Name: Northwest Cascade, Inc. DBA Honey Bucket (c/o Greg Potts); cc: Merissa Moeller (Stoel Rives LLP)

Mailing Address: PO Box 73399

City: Puyallup

State: Washington

ZIP: 98373

Phone: (253) 848-2373

Email: gregpotts@nwcascade.com; merissa.moeller@stoel.com

Describe your relationship to the project (e.g., applicant, neighbor) and standing to appeal the decision, including whether you submitted comments during the applicable comment period and how you would be adversely affected by the decision:

Applicant; adversely affected by decision that business operations are not allowed under the property's current zoning.

Applicant requested the appeal stating they would be, "Adversely affected by decision that business operations are not allowed under the property's current zoning".



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Request for Review/Appeal

- TDC 32.310 (Request for Review) applies to this process:
 - Staff has provided analysis and findings for all applicable code sections
 - The applicant submitted additional letters to City Council on September 18th that are included in the packet materials



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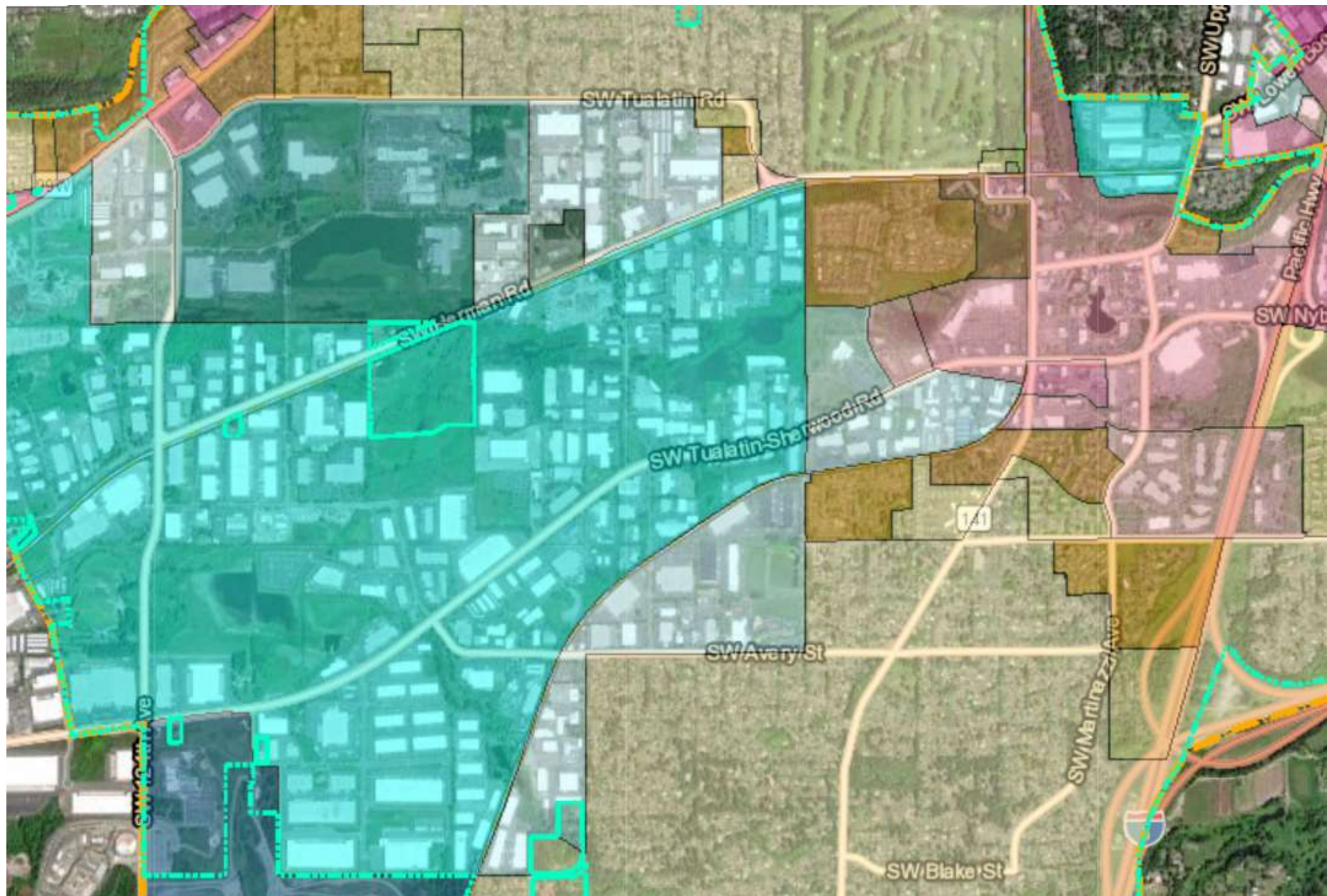
COUNCIL ACTION

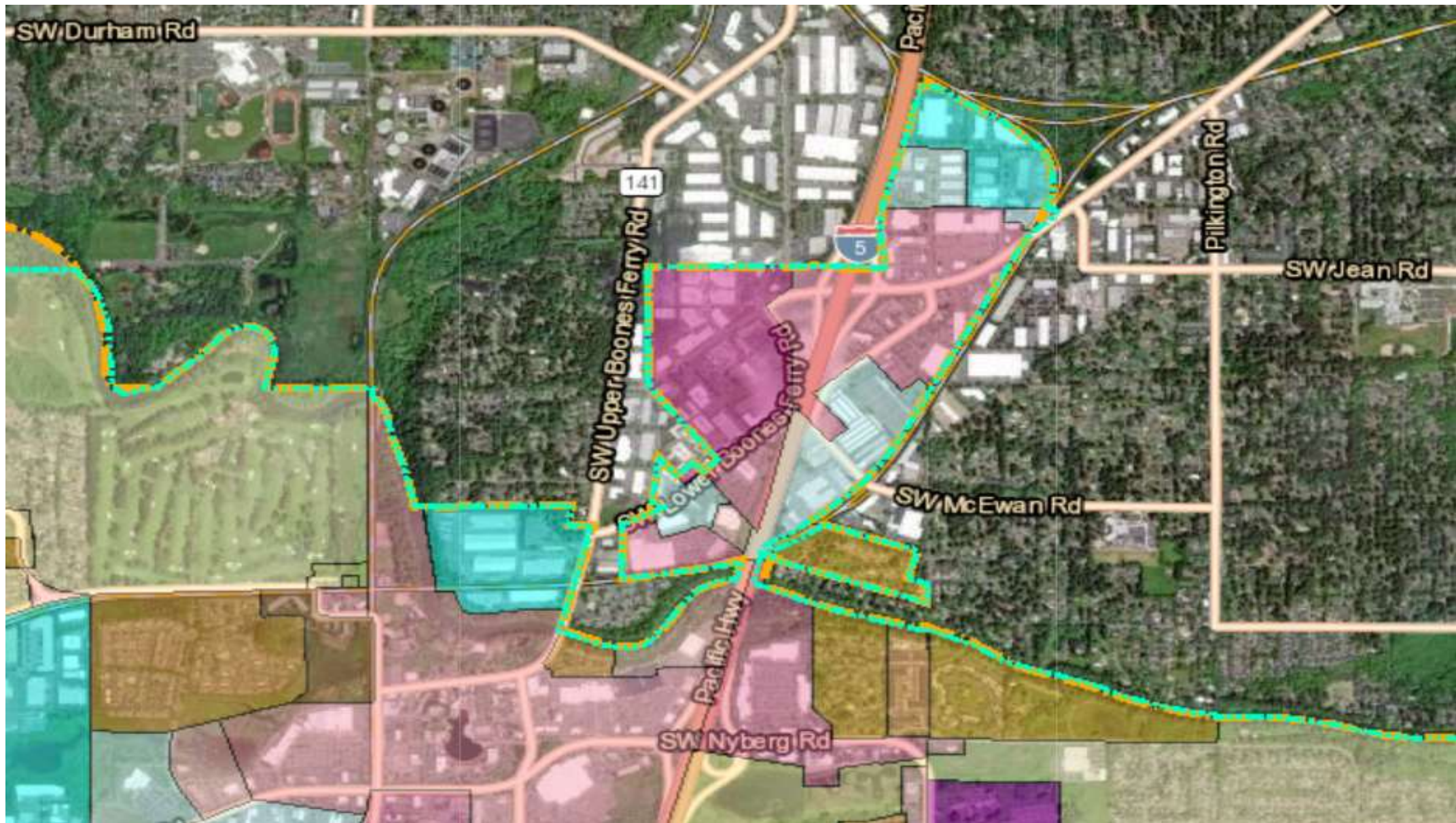


City Council is asked to make a decision on the Request for Review of the INT25-0001 Honey Bucket Interpretation.

Council may:

- *Affirm the INT25-0001 Decision and adopt Resolution 5915-25;*
 - ***i.e. deny appeal***
- *Revise or modify the INT25-0001 Decision and adopt a written order that clearly states the basis for the Council's decision;*
- *Reverse the INT25-0001 Decision and adopt a written order that clearly states the basis for the Council's decision; or*
 - ***i.e. approve appeal***
- *Continue the hearing to a later date.*







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