



August 25, 2026

VIA email to council@hillsboro-oregon.gov, Ruth.Klein@hillsboro-oregon.gov

RE: Comments in support of the appeal of land use application DR-044-25

Mayor Pace, Council President Harris, members of Hillsboro City Council,

Bird Alliance of Oregon (formerly Portland Audubon) is a statewide conservation organization and community of people that have loved and advocated for Oregon's wildlife and wild places for more than 100 years. We are reaching out to you on behalf of our over 12,000 supporters, many of whom are residents of Washington County, including many in the City of Hillsboro. We are concerned the environmental impacts of the Sky Harbour Project will exacerbate the pollution the Willamette and Tualatin Basins are already facing. Thank you for the opportunity to comment on the Sky Harbour Appeal.

Bird Alliance of Oregon supports the appeal of land use application DR-044-25 ("Sky Harbour") and respectfully asks that the Council reverse the Planning Commission's approval decision.

As appeal applicants have noted, Jet A combustion generates massive quantities of UFPs (ultrafine particles under 100 nanometers). Because of their microscopic size, UFPs cross the blood-brain barrier and enter the bloodstream. Research directly links airport-generated UFPs and fine particulate matter to cardiovascular disease¹, pulmonary conditions like COPD, respiratory illness, and increased cancer risks in nearby communities. In addition to impacting people, these UFPs also impact the wildlife that is found at and near the airport.

In addition to environmental toxins, noise pollution has significant negative impacts for many native birds² by increasing chronic stress, stunting chick growth, and masking critical mating and predator-detection sounds. Additional air traffic at the Hillsboro Airport will lead to even more noise pollution at important public natural areas at Cooper Mountain and portions of Bull Mountain, both havens for birds and other wildlife.

Sky Harbour's facility will be in direct conflict with the Environmental Stewardship goals in the Hillsboro 2035 Community Plan:

¹ Abdillahi, S.F.I. and Y-F Wang. 2023. Ambient ultrafine particle (PM_{0.1}): Sources, characteristics, measurements and exposure implications on human health. *Environmental Research* 218 <https://www.sciencedirect.com/science/article/abs/pii/S001393512202388X?via%3Dihub>

² Natalie L. Madden, Kirby L. Mills, Karen M. Alofs, Clinton D. Francis, Neil H. Carter; Trait-mediated effects of anthropogenic noise on bird behaviour and fitness. *Proc. R. Soc. B* 1 February 2026; 293 (2064): 20252521. <https://doi.org/10.1098/rspb.2025.2521>

- Initiative 1: Encourage and implement infrastructure enhancements to reduce energy use and the use of fossil fuels.
- Initiative 8: Improve air quality and reduce carbon emissions.

The proposed use for this development will cause direct environmental and climate damage. Private jet travel is the most carbon-intensive mode of passenger transport. This 30-jet facility is being designed to support the Bombardier Global 7500, which burns 1,000 gallons of jet fuel in the first 30 minutes of flight. Given the intensity of the climate crisis, every single government entity in the world should be working to completely eliminate the use of fossil fuels, and should never be incenting more use of fossil fuels. Although you may be evaluating this case as a local land use issue, your vote will have local and global ramifications.

The local approval criteria under the Hillsboro Community Development Code (CDC) both explicitly and implicitly grant the City authority to review and mitigate noise pollution, environmental contaminants, and air quality concerns:

- CDC Section 12.70.110(D)(8)(d) - Grants the Planning Director express authority to require additional technical reports when a proposal "would likely result in significant adverse impacts with respect to noise, toxic or noxious matter... air pollution, wastes or other objectionable effects within the development site or immediate surrounding areas."
- CDC Section 12.80.040(7)(e) - Explicitly states that approval requires demonstrating that "Negative impacts of the development have been sufficiently minimized or mitigated." Increased jet traffic increases localized toxic emissions; without an assessment of the projected noise, environmental contaminants, and air pollution, the City cannot conclude these impacts have been minimized or mitigated.

The negative impacts of this development must be fully evaluated, and then minimized or mitigated, as required by the Hillsboro Community Development Code. The impacts include noise and air pollution, carbon emissions, and pollution to the nearby area, including Dawson Creek, a major tributary of the Tualatin River. The applicant has not met the burden of proof on these issues.

Because of these issues, Bird Alliance of Oregon respectfully asks the City Council to reverse the Planning Commission's approval decision and deny DR-044-25.

Sincerely,

Joe Liebezeit
Statewide Conservation Director
Bird Alliance of Oregon
jliebezeit@birdallianceoregon.org

Micah Meskel
Urban Conservation Director
Bird Alliance of Oregon
mmeskel@birdallianceoregon.org