



STAFF REPORT

To: Robby Hammond, City Manager

From: Ruth Klein, Senior Planner

Date: August 18, 2026

Subject: Two Appeals of Development Review Approval for Aircraft Hangars
Case File No. APPEAL-001-26 Sky Harbour Barnes et. al.
Case File No. APPEAL-002-26 Sky Harbour Richmond et. al.
Underlying Case File No. DR-044-25 Sky Harbour Hangars

Requested Action:

Planning Division staff recommends that the City Council deny APPEAL-001-26 and APPEAL-002-26, affirm the decision under appeal with the changes described in Section VII of this report, and adopt an order containing the Council's findings of fact, conclusions, and conditions of approval.

Staff does not ask the Council to affirm Order No. 8492 exactly as written. Staff has identified deficiencies in that order and in the findings supporting it, and identifies them in this report rather than leaving the Council to encounter them at the hearing. Each is addressed in Section VI with a proposed remedy.

I. WHAT THE COUNCIL IS DECIDING AND UNDER WHAT STANDARD

This section describes the Council's role. It appears first because the standard of review governs everything that follows.

The hearing is de novo.

The Council granted a de novo hearing on both appeals. Under CDC Section 12.70.180.H.2, an appeal of a Type III decision is heard on the record, meaning a review of the record with the right of argument but without submittal of new evidence, unless a de novo hearing is requested and accepted. Under Subsections G.3 and H.3, a de novo hearing means that new evidence and argument may be introduced in writing or orally.

The Council is therefore not limited to the evidence that was provided before the Planning Commission. Any party may submit evidence and arguments that the Commission did not receive, including evidence responding to the conditions of approval.

The Council affirms or reverses, with or without changes.

Under CDC Section 12.70.180.E.4.a, at the conclusion of the hearing the appeal body shall reverse or affirm the decision under appeal, with or without conditions or changes. The Council may alternatively continue the hearing under Subsections E.4.b through E.4.d. Under Subsection E.5, after the record closes a written decision shall be prepared containing a statement of the facts relied upon by the appeal body demonstrating the reasons why the decision under appeal is reversed or affirmed based on the applicable criteria and standards, a statement of conclusions based on those findings, and an explanation of the basis for any changes to the earlier decision, including additions, deletions, or revisions to conditions of approval.

The findings in the order the Council adopts are the Council's own findings. They are not supplements to the findings adopted by the Planning Commission. Where this report recommends that a finding be stated differently than it appears at Exhibit B to Order No. 8492, the recommendation is that the Council make its own finding on that criterion. Under Subsection H.6, the decision of the City Council on the appeal of a Type III decision is the final City decision.

The two appeals requested different hearing types.

The Barnes et al. appellants requested review on the record. The Richmond et al. appellants requested a de novo hearing and addressed the criteria at CDC Section 12.70.180.H.4. On July 7, 2026, the Council granted a de novo hearing on both appeals so that the two appeals could be heard concurrently in a single proceeding under a single standard. That is a resolution to procedural complexity rather than an error. The practical effect for the Barnes appellants is broader rather than narrower, because they may submit evidence that would have been inadmissible in a hearing that is on the record.

Scope of the hearing.

The Barnes supplemental statement lists six issues and states that the issues appellants intend to raise are not limited to those listed. CDC Section 12.70.180.H contains no provision limiting the scope of a de novo hearing on a Type III appeal. The scope limitation at Subsection F.4 applies to appeals of Type I decisions only. Staff has analyzed the six stated Barnes issues, the issues raised in the Richmond appeal, and issues raised in testimony before the Planning Commission that neither appellant states as a basis for appeal.

The decision deadline is September 13, 2026.

The Council is not required to reach a decision on August 18. Continuance under CDC Section 12.70.180.E.4.b or E.4.c, a further extension of the 120-day period, or a decision at a subsequent meeting all remain available. This report notes the deadline so that the Council understands the schedule it is working within.

II. TIMELINE

December 1, 2025	Application submitted
December 19, 2025	Application status letter issued
January 29, 2026	Application deemed complete
February 17, 2026	Application status letter issued
March 4, 2026	Public notice mailed
March 10, 2026	120-day extension executed
March 25, 2026	Planning Commission public hearing opened; testimony received; continued to April 8 by a vote of 5 to 0
April 8, 2026	Continued hearing; testimony received; continued to May 13 by a vote of 6 to 0
April 9, 2026	120-day extension executed
April 17, 2026	120-day extension executed
May 13, 2026	Continued hearing; testimony received; continued to May 27 by a vote of 7 to 0
May 27, 2026	Continued hearing; hearing closed by a vote of 6 to 0; application approved by a vote of 5 to 0 with 1 abstention; Order No. 8492 adopted
June 2, 2026	Notice of Decision mailed; decision final for appeal purposes
June 17, 2026	Appeal deadline, 5:00 pm; APPEAL-001-26 and APPEAL-002-26 both filed
June 30, 2026	Staff report to City Manager on receipt of two appeals, staff report dated July 7, 2026 per City formatting rules
July 7, 2026	City Council sets de novo process and combined hearing for the two appeals
July 28, 2026	Public hearing notice mailed
August 11, 2026	Staff report issued and made available to the public
August 18, 2026	City Council appeal hearing
September 13, 2026	120-day deadline for final decision

The three 120-day extension forms carry a case file number field reading DR-04-25. The forms extend the 120-day limitation on Case File No. DR-044-25. The extensions are valid and no party has raised the typographical error as an issue.

III. THE PROJECT AND HOW IT WAS REVIEWED

The site.

The subject property is a leasehold on Port of Portland land within the Portland-Hillsboro Airport, addressed as 2315 NE Brookwood Parkway and identified as Tax Lot 1550 on Washington County Assessor's Tax Map 1N2-28. The airport site totals 414.75 acres. The leasehold is 13.70 acres. The property is zoned I-P Industrial Park with a Comprehensive Plan designation of IN Industrial.

The leasehold was vacant at the time of application, a mowed grass field with no structures, trees, pavement, or above-ground improvements. City mapping confirms no Significant Natural Resource Overlay, no Regulatory Floodplain Overlay, no wetlands, no cultural resources, and no slopes of 25 percent or greater on the leasehold.

NE Brookwood Parkway is the only public street frontage. It is classified as an Arterial Street and carries Washington County designations as a Truck Route, Major Emergency Response Route, Major Pedestrian Route, and Major Transit Route. NW Airport Road, along the leasehold's northern boundary, is a private driveway on Port of Portland property.

The use.

Sky Harbour operates as a home-base operator, providing private aircraft storage, fueling, and light maintenance to sub-lessors who individually lease hangar bays. The use is classified in the CDC as an Aviation Use. Under CDC Section 12.25.250.F, aircraft storage hangars are limited to properties owned by the Port of Portland at the Portland-Hillsboro Airport.

Why the application was reviewed by the Planning Commission.

The application as originally submitted included three Major Adjustments. Under Table 12.70.020-1, a Major Adjustment is a Type III application, and under CDC Section 12.70.020.D.1 consolidated applications are processed under the highest procedure type required for any part of the application. Type III procedures were therefore required at submittal, and Table 12.70.020-1 assigns the decision on a Type III application of this kind to the Planning Commission, with appeal to the City Council.

What the original proposal was.

As submitted, and as described in the March 4, 2026 public notice and the April 1, 2026 staff report, the proposal was for six hangar buildings totaling 198,694 square feet on a 13.14-acre leasehold, designed to accommodate approximately 38 to 42 aircraft, with Major Adjustments to the front building setback and to the location of vehicle paving within that setback.

What changed in May 2026.

Following the April 8 hearing, the applicant submitted a revised proposal that eliminated every Major Adjustment. The mechanism was a change to the lease. Sky Harbour and the Port of Portland agreed to extend the western boundary of the leasehold by 23.5 feet,

which increased the leasehold from 13.14 to 13.70 acres and allowed the development to shift west, away from NE Brookwood Parkway and out of the front yard setback.

Four consequences followed from that shift, and they account for every numerical difference between the original and revised descriptions of this project.

- The minimum front building setback moved from 25 feet at Hangar 5 to 67.5 feet. The CDC minimum is 35 feet.
- Vehicle paving within the 35-foot front setback moved from 9,485 square feet to zero.
- The hangar count increased from six buildings to seven, because Hangar 2 was divided into two smaller buildings designated 2a and 2b. Total hangar area decreased by 9,385 square feet to 189,309 square feet, driven by a reduction in the footprint of Hangar 5.
- Anticipated aircraft decreased from approximately 38 to 42 down to approximately 30.

Roof forms changed from shed to gable, which reduced effective building height for FAA Building Restriction Line purposes and permitted the westward shift without exceeding height limits. Exterior materials changed from tilt-up concrete to corrugated and flat metal paneling.

Why the description in the record changes partway through.

The Council will encounter both descriptions in the record. The March 4 notice, the April 1 staff report, and the agenda captions for the April 8 and May 13 hearings describe six hangars on 13.14 acres with Major Adjustments. Order No. 8492 and the May 20 supplemental staff report describe seven hangars on 13.70 acres with no adjustments. These are not inconsistencies in the record. They are the same project before and after the May revision. At the May 27 hearing, staff stated on the record that the original project description was read into the record deliberately, so that it would be clear both what was being discussed and how the application had changed.

A Type II decision reached through Type III procedures.

Once the Major Adjustments were withdrawn, nothing remaining in the application required Type III procedures. What remained was a Development Review, which Table 12.70.020-1 assigns to Type II procedures when it stands alone. The application nonetheless continued under Type III procedures. It had been noticed as a Type III application, and the Planning Commission had opened the public hearing on March 25, 2026 and continued it twice. CDC Section 12.70.020.C directs that questions regarding the appropriate procedure be resolved in favor of the procedure type providing the widest notice and opportunity to participate. The City Attorney reviewed the question and concurred that the application should continue under Type III procedures following withdrawal of the Major Adjustments.

The result is a Type II decision reached through Type III procedures. The consequences favor the public. Under Type II procedures the application would have been decided by the Director without a public hearing, no neighborhood meeting would have been required

under Table 12.70.020-1, and an appeal would have been heard by the Planning Commission. Because the application was processed under Type III procedures, the Planning Commission held four public hearings and these appeals are before the City Council.

IV. WHAT THE PLANNING COMMISSION DECIDED AND WHY

Four hearings over nine weeks.

The Planning Commission opened the public hearing on March 25, 2026 and continued it three times, to April 8, to May 13, and to May 27. Testimony was received at every hearing. The applicant requested the March 25 and May 13 continuances. The April 8 continuance followed Commission and public comment on the balance between the requested Major Adjustments and the public benefit offered to compensate for them, and the applicant requested time to respond. That response became the May revision that eliminated the adjustments entirely.

The Commission received written testimony throughout. The record before the Commission includes seven supplemental staff reports transmitting testimony received between hearings, together with testimony delivered at each hearing.

What the Commission examined.

Testimony to the Commission raised aircraft noise, air quality and emissions, property values and County tax revenue, the adequacy of the 500-foot notice radius, hearing schedule and process, environmental review and the FAA Categorical Exclusion, traffic and trip generation, stormwater, fuel storage and fire safety, tree canopy, heat island effects, wildlife, the classification of NW Airport Road, consistency with the Hillsboro 2035 Community Plan, and the scope of the Commission's own jurisdiction. Staff responded to each topic in writing in the supplemental staff reports, and the Commission questioned staff and the applicant on the record at each hearing.

The Commission's deliberation on May 27 addressed the limits of its own authority directly. Commissioners discussed whether the CDC reached aircraft operations, noise, and emissions, and concluded it did not, noting that the Hillsboro Municipal Code exempts aircraft noise because it is federally regulated. Commissioner Davis observed on the record that Commissioners are members of the community who are themselves affected by these decisions, that the Commission is bound by the CDC, and that the outcome is not always what individual Commissioners would prefer.

Where the Commission went further than staff recommended.

Staff's May 20 recommendation was for approval based on compliance with the approval criteria, without additional conditions beyond those in the draft order. The Commission did not simply adopt that recommendation.

During deliberation, Commissioner Grillo identified an open question as to whether negative impacts from aircraft movement on the site had been sufficiently mitigated and proposed a solid barrier at least six feet high running from Hangar 5 to the site entrance.

The stated purpose was to contain noise and visual impacts from aircraft movement within the site and direct them toward the taxiway, and to address the most open street-facing edge of the site. Commissioner Davis agreed, and raised jet blast during taxiing as a reason that a masonry material would be needed rather than wood. Commissioner Thrall-Nash asked staff what materials the code required for fences and walls in the I-P zone, and staff confirmed that materials are generally unrestricted in the I-P zone absent an overlay or plan district.

The motion.

Commissioner Thrall-Nash moved to approve Development Review-044-25 Sky Harbour Hangars with an additional finding under CDC Section 12.80.040.H.7.e that the negative impacts of the development had not been sufficiently minimized or mitigated, and, to sufficiently minimize or mitigate the negative impacts of noise at the site, to add a condition of approval requiring the applicant to construct a masonry or brick wall extending from Hangar 5 to the site entrance along the proposed fence line, with a minimum height of six feet. Commissioner Davis seconded. The motion passed 5 to 0 with 1 abstention. Ayes: Jones-Gallardo, Saaka, Thrall-Nash, Grillo, Davis. Nays: none. Abstention: Jackson.

What the order contains.

Order No. 8492 approves the Development Review subject to 45 conditions of approval at Exhibit A and findings of fact at Exhibit B. Condition 45 requires a six-foot masonry wall. Exhibit B does not contain the finding the Commission voted to add. That discrepancy is addressed at Issue 8 in Section VI of this report.

Beyond the wall, the conditions include right-of-way dedication along NE Brookwood Parkway, a restrictive covenant protecting a 48-foot setback for a planned three-lane collector along the northern frontage, a development agreement obligating the Port or the applicant to fund half-street improvements when that collector is built, removal of the existing unsignalized curb cut, sight distance certification, activation of the west leg of the NE Brookwood Parkway and Brookwood Library traffic signal as directed by Washington County, and solar panel installation on the ground support equipment building.

Two deficiencies on the face of Order No. 8492.

The signature page of Order No. 8492 reads that the order was approved on the 27th day of March, 2026. The Planning Commission approved the order on May 27, 2026, as the recitals of the order and Exhibit B both state.

Separately, Section 1 of the order attaches the Washington County Assessor's tax map as Exhibit C and makes it a part of the order, and Section 2 bases the approval on an excerpt from the application as Exhibit D in addition to the conditions of approval at Exhibit A and the findings at Exhibit B. Exhibits C and D were not attached to the order as issued and were not transmitted with the Notice of Decision mailed June 2, 2026. Staff will state this deficiency on the record at the hearing. The order the Council adopts in this proceeding recites the correct date of adoption and includes each exhibit recited within it.

Finality.

The decision became final for appeal purposes on June 2, 2026, the date the Notice of Decision was mailed. The appeal period closed at 5:00 pm on June 17, 2026. Both appeals were filed on June 17, 2026 and both are timely.

V. APPEAL ISSUES

The two appeals overlap substantially. This section is organized by issue rather than by appellant, so that the Council considers each dispute once with all positions before it. Where the appellants differ, the difference is stated. Each issue presents the appellants' assertion, what the record shows, the applicant's response, and staff's position. The applicant's July 30, 2026 letter states that the applicant anticipates submitting additional testimony and evidence before the hearing. Where the applicant has not addressed an issue, this report says so.

Issue 1. Notice radius, CDC Section 12.70.050.F.1.c

Appellants' assertion. Barnes, Argument 1 and 2. Notice was not provided to owners of record within 500 feet of the perimeter property line of the property subject to the application. Appellants argue the measurement runs property edge to property edge, and that the property subject to this application, as stated in the Planning Commission's order, is the 414.75-acre Port of Portland site. Argument 2 argues the neighborhood meeting requirement at CDC Section 12.70.100.C.2 fails for the same reason. Testimony before the Commission raised a broader version of this argument, contending that residents in aircraft approach, takeoff, and downwind corridors received no mailed notice.

What the record shows. The caption of Order No. 8492 describes approval on a leasehold approximately 13.70 acres in size within the Portland-Hillsboro Airport's 414.75-acre site. Section 1 of the order grants approval on approximately 13.70 acres of land on property described as Tax Lot 1550 on Washington County Assessor's Tax Map 1N2-28. The airport comprises several tax lots, of which Tax Lot 1550 is the largest. Notice was mailed March 4, 2026 to owners of record within 500 feet of the perimeter of Tax Lot 1550.

Applicant's response. The CDC does not define property, but in the context of this requirement it refers to the tax lot on which the development is proposed. The notice provisions require that notice include the map and tax lot number and the site address. The airport comprises several tax lots. Tax Lot 1550 is the tax lot subject to the application and the lot from which the 500-foot requirement was derived.

Staff position. Staff agrees that the property or properties subject to the application mean the tax lot on which the development occurs. The notice content requirements at CDC Section 12.70.050.F confirm that reading. The City has consistently applied the section this way, measuring the 500-foot radius from the perimeter of the tax lot on which development is proposed rather than from the full extent of a property owner's contiguous holdings.

The reading appellants advance would produce results the section cannot support. Under it, the notice area for any application at the Portland-Hillsboro Airport would extend 500 feet from the outer boundary of all Port holdings regardless of where on the airport the development occurs, so that a project at the northeast corner and a project at its southwest corner would generate identical mailing lists. The same reasoning would apply to any large landowner in the City. The reference to the 414.75-acre airport site in the caption of Order No. 8492 is descriptive of the site's context rather than a statement of the property subject to the application. Section 1 of the order, which is the operative grant, describes approval on approximately 13.70 acres on Tax Lot 1550.

Argument 2 asserts that the neighborhood meeting requirement at CDC Section 12.70.100.C.2 fails for the same reason. That section requires the applicant to provide mailed notice of the neighborhood meeting to the same notification radius the City requires for that application type. Because the City's radius was correctly derived, the neighborhood meeting radius derived from it was likewise correct. Argument 2 fails with Argument 1.

The broader argument advanced in testimony does not correspond to the code. Notice requirements are keyed to proximity to the physical development under review. They are not calibrated to the operational footprint of an approved use, and no provision of the CDC extends mailed notice on that basis.

Issue 2. Comprehensive plan policy and scope of review, CDC Section 12.01.130

Appellants' assertion. Barnes, Argument 3. The Planning Commission failed to apply CDC Section 12.01.130, which applies to all use or development of land or structures within the City limits. Appellants assert that a number of comprehensive plan policies are violated and that the Commission made no findings in response. Richmond raises a related argument that the proposal is inconsistent with the Hillsboro Airport Master Plan and the Hillsboro 2035 Community Plan.

What the record shows. Order No. 8492 recites that the Commission's review authority is limited to compliance with applicable CDC standards, and that questions regarding Comprehensive Plan policy interpretation, Metro Urban Growth Management Functional Plan compliance, or Oregon Revised Statutes unrelated to land use are outside the scope of this Development Review. The same position appears in the Key Considerations section of Supplemental Staff Report No. 4, which states that the Hillsboro 2035 Community Plan is the City's comprehensive plan and that its policies are implemented through the CDC.

CDC Section 12.01.130.A provides that all use or development of land or structures within the City limits shall comply with the Hillsboro Comprehensive Plan, the Hillsboro Municipal Code, and applicable regional, State, Federal and local laws. It further provides that determination of compliance with regional, State, Federal or local laws shall be made by the authority responsible for administering the subject law, and that such a determination

shall not be a standard or condition of approval. Subsection B provides that the provisions of the CDC shall be interpreted as minimum requirements.

Applicant's response. The applicant has not responded to this issue.

Staff position. The approval criteria for a Development Review are those set out at CDC Section 12.80.040.H. That section directs the Review Authority to make findings of fact that the enumerated criteria are satisfied. Comprehensive Plan consistency is not among them. Comprehensive Plan policies are implemented through the development standards of the CDC, and an application that satisfies those standards satisfies the policies as adopted and implemented. Further, there are applicable land use-related Oregon Revised Statutes that the Review Authority is required to apply to this application.

Staff acknowledges that the Commission's position on scope was stated as a conclusion rather than developed as a finding responding to Section 12.01.130. The order the Council adopts states a finding on the question directly.

Issue 3. Base zone standards and the ownership limitation, CDC Section 12.25.250.F

Appellant's assertion. The Planning Commission approved the application without making a finding that the proposed use satisfies the ownership limitation that makes it permissible in this zone.

CDC Section 12.25.250.F permits aircraft storage hangars in the I-P zone only on property owned by the Port of Portland at the Portland-Hillsboro Airport. Criterion 1 at CDC Section 12.80.040.H requires a finding that the proposal complies with all development standards of the base zone. The argument is that the Exhibit B finding for Criterion 1 addresses dimensional standards only, never reaches the ownership limitation, and that the applicant's narrative asserting the limitation in a single sentence is not a finding by the Review Authority.

The argument was raised by Michael Turk in written testimony received May 27, 2026 and transmitted to the Commission in Supplemental Staff Report No. 6. It is not stated as a ground in either appeal.

What the record shows. The Exhibit B finding for Criterion 1 addresses lot size, density, floor area ratio, lot dimensions and frontage, setbacks, building height, building coverage, and landscaping under Table 12.25.260-1. It does not address the limitation at Section 12.25.250.F. Turk asked the Commission to address all three of his items on the record before adopting any order. The May 27 minutes do not reflect that any of the three were taken up in deliberation. The underlying facts are not in dispute. The site is a leasehold on Port of Portland-owned property within the Portland-Hillsboro Airport, and the proposed use is aircraft storage hangars.

Applicant's response. The applicant has not responded to this issue.

Staff position. The finding is incomplete. The standard is met on the face of the record, but the order does not say so, and Criterion 1 requires that it be said. The order the Council adopts states a finding under Criterion 1 addressing the limitation at Section 12.25.250.F and concluding that it is satisfied. Staff notes that Turk raised this before the Commission voted.

Issue 4. Waste and recycling enclosure gate openings, CDC Section 12.50.270.D.2.b

Appellants' assertion. The waste and recycling enclosures do not meet the minimum gate opening width the code requires, and nothing in the code allows a narrower opening.

CDC Section 12.50.270.D.2.b requires hauler gate openings of at least 12 feet. The plans show narrower openings. The argument is that the standard states a minimum with no waiver available, that hauler agreement is not a basis for a reduced dimension, and that the finding relies on a condition deferring the question without citing CDC authority for an exception.

Richmond appeals on this basis. Michael Turk raised the same issue before the Planning Commission in written testimony received May 27, 2026.

What the record shows. CDC Section 12.50.270.D.2.b provides that gate openings which allow access to users and haulers shall be provided on all storage areas, and that gate openings for haulers shall be a minimum of 12 feet wide and capable of being secured in both closed and open positions. The standard applies to this development under Subsection B.1.c, which extends the section to all new construction subject to a Type II or III review procedure in an industrial zone.

The section contains no alternative compliance provision for gate opening width. The only place in Section 12.50.270 where the consent of a collection service operates as a compliance pathway is Subsection E, which exempts curbside collection from individual dwelling units in townhouse buildings containing five or more units. That exemption does not apply here.

Two exterior waste and recycling enclosures are proposed, one in each phase. The enclosure detail at Sheet C.4 A107 shows two bays, each dimensioned at 10 feet 0 inches, with gates swinging outward from corner and center posts. The detail labels a 12 percent sloped concrete slab in both bays, and carries applicant notes reading "Verify with MWAA hauler requirements at each bay" and "Verify with hauler requirements at the enclosure depth dimensions".

The Exhibit B finding for Section 12.50.270 states that gate opening widths are shown at less than the required 12-foot minimum, that the hauler has confirmed its trucks can service the site with the narrower openings, and that a condition of approval requires the applicant to document hauler confirmation of the alternate gate width at building permit. No such condition exists in Exhibit A. Condition 32 requires that plans show the trash

enclosure has a slope no greater than 3 percent, which addresses the grade deficiency and refers to a single enclosure where two are proposed. No condition addresses gate width.

The Exhibit B finding does not address two further standards in the same subsection. Subsection D.2.b also requires that gate openings be capable of being secured in both closed and open positions. Subsection D.3.c requires that the full length of the accessway to any enclosed or covered storage area provide at least 12 feet of horizontal clearance and 20 feet of vertical clearance.

Applicant's response. The applicant acknowledges that the requirement was not carried through as a condition of approval, states that it will meet the requirement at building permit stage, and states that it would welcome a condition of approval requiring compliance with the standard. CDC Section 12.70.120.B provides that an applicant may request a condition of approval, and that the condition is valid and enforceable when the applicant consents to it in writing or on the record. The applicant's July 30, 2026 letter is that consent.

Staff position. Staff does not defend the finding. Turk and Richmond are correct that CDC Section 12.50.270.D.2.b states a minimum with no exception mechanism, and that hauler confirmation does not satisfy it.

Staff acknowledges its own error. The purpose of the section at Subsection A is to assure functional and adequate space and access for efficient collection, and the standard is calibrated to expected hauler needs. Staff treated confirmation from the franchise hauler that the reduced width would function as satisfying that purpose, and therefore as satisfying the standard. It does not. Where the code intended a collection service's consent to substitute for compliance, it said so expressly and confined it to a circumstance not present here. Relief from the standard was available through the Adjustment process on application by the applicant. Staff had no authority to accept a reduced dimension outside that process in the course of plan review.

No Adjustment was requested and none was granted. The applicant did not seek relief from this standard, and the record's statements that the revised proposal contains no Major Adjustments remain accurate. What exists is an incorrect finding, not an unapproved deviation.

Two paths are available to the Council.

- **Compliance by condition.** The Council revises Condition 32 to require compliance with the location, design, and access standards of CDC Section 12.50.270.D at both enclosures. The applicant has stated it will meet the standard and would welcome the condition. No Adjustment is required because nothing is adjusted. Staff recommends this course.

- **Approval of a Major Adjustment.** The deviation is 2 feet, or 16.7 percent below the standard, which exceeds the 10 percent threshold for a Minor Adjustment at CDC Section 12.80.154.C.1. Relief was available through a Major Adjustment under CDC Section 12.80.156, which may be requested as part of a Type III Development Review application. The applicant did not request one. Staff recommends against this course. It requires a request the applicant has not made and has stated it does not want. Subsection B requires that Major Adjustments be clearly identified on all plans in the primary application, and they are not. And Subsection C.4 requires that the request include design features, such as the public benefit standards at CDC Section 12.50.900 or the habitat friendly practices at CDC Section 12.50.930, that compensate for the Adjustment or better meet the purpose of the standard being adjusted, which would reopen the compensating-benefit analysis that the May 2026 revision resolved by eliminating every requested Adjustment.

Issue 5. Second neighborhood meeting, CDC Section 12.70.100.D

Appellants' assertion. The project changed substantially after the neighborhood meeting was held, and no second neighborhood meeting was held before the revised application was submitted.

The October 29, 2025 neighborhood meeting addressed a proposal for six hangars on 13.14 acres with three Major Adjustments. The May 2026 revision changed all three of those elements. The argument is that this constitutes a substantial revision of major elements, that CDC Section 12.70.100.D therefore required a second meeting with new notice, that no second meeting appears anywhere in the record, and that Exhibit B does not address whether one was required.

Richmond appeals on this basis. Michael Turk raised the same argument before the Planning Commission in written testimony received May 27, 2026.

What the record shows. CDC Section 12.70.100.D requires a second neighborhood meeting with new notice, before a revised application is submitted, where a proposal is revised either by the addition of one or more tax lots or by the substantial revision of major elements as cited in paragraph C.3. The major elements listed at paragraph C.3 are the number and type of dwellings if applicable, proposed uses, street, lotting, and parking layouts, approximate building locations and heights, and approximate locations for open space and natural resource preservation.

The neighborhood meeting was held October 29, 2025 and its documentation is in the record as an exhibit to the application. No second neighborhood meeting was held. Exhibit B does not address whether one was required.

Applicant's response. The applicant has not responded to this issue.

Staff position. A second neighborhood meeting was not required. Whether a revision constitutes a substantial revision of major elements is a staff determination, and staff determines that this revision was not.

No tax lot was added. The leasehold expansion occurred entirely within Tax Lot 1550. The proposed use did not change. The proposed use and street, lotting and parking layouts did not change. The revision moved the development westward within the same leasehold, farther from NE Brookwood Parkway and farther from the properties whose owners received notice. Total building area decreased, anticipated aircraft decreased, and effective building height decreased. The building count changed because one previously proposed hangar was divided into two smaller buildings, not because a new building was added. Every requested deviation from the code was eliminated.

The revision also reduced the process the code would have required. Table 12.70.020-1 requires a neighborhood meeting for a Type III Development Review and requires none for a Type II Development Review. Had the revised proposal been processed under the procedure the code assigns it, no neighborhood meeting would have been required at all. A revision that reduces both the physical intensity of the proposal and the process the code would require of it is not a substantial revision of major elements within the meaning of Section 12.70.100.D.

The order the Council adopts states this determination as a finding, because Exhibit B is silent on it and the question was raised before the Commission voted.

Issue 6. Traffic, CDC Sections 12.80.040.H.7.a and 12.70.220

Appellants' assertion. Barnes, Argument 4. Whether the amount of traffic triggers the need for a Transportation Impact Analysis is not responsive to the criterion, and there is no evidence that the additional traffic that this development would generate can be safely and adequately accommodated. Richmond raises a related argument that staff waived a full traffic impact analysis.

What the record shows. The applicant submitted a trip generation memorandum, revised May 4, 2026, projecting a maximum of 32 vehicle trips in each of the morning and evening peak hours under a worst-case scenario assuming all aircraft active simultaneously. The threshold at CDC Section 12.70.220.A of 50 peak hour trips is based on vehicle trip generation, and the projection falls below it.

Transportation Systems Engineer Joseph Auth reviewed the revised memorandum and confirmed that no Transportation Impact Analysis was required, that all study intersections currently operate acceptably, and that they are projected to continue operating acceptably through a 2029 buildout year.

The Exhibit B finding at Criterion 7.a states that the trips do not trigger a traffic impact study, that site access connects directly to an existing traffic signal on NE Brookwood Parkway, and that an existing unsignalized driveway will be removed so that all site traffic

uses the signal. Conditions 4, 5, and 40 address sight distance certification, replacement of the unsignalized curb cut, and activation of the west leg of the signal as directed by Washington County. Conditions 2, 3, and 39 protect the corridor for a planned three-lane collector along the northern frontage.

Applicant's response. The trip generation memorandum demonstrates that projected trips do not trigger a study under Section 12.70.220.A, and the findings conclude that the functional capacity of NE Brookwood Parkway is retained. No requirement was waived as a matter of discretion; the threshold was not met. Traffic safety is addressed independently of the study threshold through Conditions 4, 5, and 40.

Staff position. Barnes is correct that the threshold determination and the approval criterion are different questions. Whether a study is required under Section 12.70.220.A does not by itself answer whether the transportation system can safely and adequately accommodate the development under Section 12.80.040.H.7.a.

The record addresses the criterion, but the finding leads with the threshold. Beyond that determination, the record contains an independent engineering review confirming acceptable intersection operation through 2029 buildout, the routing of all site traffic to an existing signalized intersection, the removal of the unsignalized curb cut, and conditions requiring sight distance certification and signal activation as directed by Washington County. The order the Council adopts rests the finding under Criterion 7.a on that evidence rather than on the study threshold.

Issue 7. Compatibility with surrounding development and land uses, CDC Section 12.80.040.H.7.d

Appellants' assertion. Barnes, Argument 5. The finding that surrounding development and land uses are industrial and aviation in character on all sides is factually incorrect, the finding of limited external impacts is not supported by evidence, and the analysis was inappropriately constrained to airfield activities to the west. Richmond asserts that the findings fail to consider the actual surrounding uses, which include a public library and other office buildings, and fail to consider the characteristics of the proposed use including jet characteristics, fueling facilities, and hangars. Richmond further asserts that increased intensity makes the development incompatible with residential land uses under the flight path, and identifies noise, jet blast, heat, fumes, and pollution as impacts the Commission failed to address.

What the record shows. The Exhibit B finding at Criterion 7.d states that surrounding uses are industrial and aviation in character on all sides, identifies the airport taxiway and airfield to the west, existing private aircraft hangars to the south, and industrial and business park development across NE Brookwood Parkway to the east, states that no residential uses or zones abut the leasehold, and concludes that operations are controlled-access with limited external impacts. The Hillsboro Brookwood Library is located across NE

Brookwood Parkway from the site. Supplemental Staff Report No. 4 states that the closest point of the library main entrance is approximately 475 feet from the nearest aircraft ramp area. The Exhibit B finding does not mention the library.

Applicant's response. Compatibility under Criterion 7.d is measured against surrounding and abutting land, not against residences located under a flight path. Aircraft in flight are the responsibility of the FAA and are not an operating characteristic of this development. The CDC definition of development enumerates physical, human-made changes to real estate, and aircraft takeoffs, landings, and taxiing are not physical alterations of real property. The applicant does not contend that operating characteristics is an empty phrase; it reaches on-site, ground-level attributes including controlled access, 24-hour operation, on-site fueling, ground support equipment movement, lighting, hours, on-site circulation and traffic, waste handling, and security, and the findings evaluate those attributes.

Staff position. Staff agrees that the criterion measures the proposed development against surrounding and abutting land uses, and that aircraft in flight are outside the reach of the CDC.

Staff does not defend the finding as written. The characterization that surrounding uses are industrial and aviation in character on all sides is broader than the record supports. The Brookwood Library sits across NE Brookwood Parkway, approximately 475 feet from the nearest ramp area, and staff addressed the library at length in Supplemental Staff Report No. 4. The finding should have accounted for it and did not.

Staff also corrects an error in its own response at the May 27 hearing.

The Brookwood Library occupies a building that was constructed and used as an office, a use permitted outright in the M-P Industrial Park zone under Zoning Ordinance No. 1945, Section 65(3). The City purchased the building and received Development Review approval for the remodel on March 28, 2007 under Case File No. DR-012-07, approved administratively by the Planning Department. The City then occupied the building as a library. A library is a public service use, also permitted outright under Section 65(4). Libraries were not among the conditional uses listed at Section 65A. No conditional use approval was required for either the prior office use or the library use, and none was obtained. The property was zoned M-P Industrial Park in 2007 and is zoned I-P Industrial Park today. M-P is the predecessor designation to I-P; the property has not been rezoned.

At the May 27, 2026 hearing, staff responded to a Commissioner question regarding compatibility between the proposed aviation use and the library by stating that the library was approved as a conditional use and therefore carried the burden of demonstrating compatibility with surrounding industrial and aviation uses. That response applied the use classifications in the Community Development Code as they exist today rather than the

zoning in effect when the library was approved. It was incorrect. Staff corrects it here.

The correction does not alter the conclusion under CDC Section 12.80.040.H.7.d. The compatibility analysis under that criterion runs in one direction only, evaluating the proposed development against surrounding development and land uses. Nothing in the criterion assigns a burden to an existing use, whether that use was permitted outright or approved conditionally.

The order the Council adopts states a finding under Criterion 7.d that identifies the Brookwood Library among the surrounding uses, states its distance from the nearest ramp area, and addresses compatibility with it directly, including the landscaped front yard, the berms along the NE Brookwood Parkway frontage, the separation between parkway paving and the nearest on-site vehicle area, and the masonry wall required by Condition 45.

Issue 8. Negative impacts, CDC Section 12.80.040.H.7.e, and Condition 45

This is the central issue in both appeals.

Appellants' assertion. Richmond asserts that the Commission acknowledged during the final motion to approve that Section 12.80.040.H.7.e was not satisfied, that approval cannot be granted unless all applicable criteria are met, that the negative impacts are not sufficiently minimized or mitigated even with the added condition, and that the written order is incomplete because the finding contained in the motion does not appear in it. Richmond further asserts that the condition was added after public testimony closed with no opportunity for comment on the feasibility, safety, or regulatory compliance of the wall, and that Condition 45 is inadequate. Barnes, Argument 6, asserts that 24-hour access-controlled operation imposes no functional limit on the intensity of the use or its impacts, and that an aircraft housed at the development could make multiple flights per day without constraint.

What the record shows. The approved May 27, 2026 minutes record the motion set out in Section V of this report. Richmond's transcription of the motion is substantively accurate. The Exhibit B finding at Criterion 7.e states that the site is surrounded by industrial and aviation uses where impacts to sensitive uses are not a concern, addresses exterior lighting, screening of utilitarian features, and removal of the existing curb cut, and concludes that the criterion is met. It does not contain the finding the Commission voted to add. It does not mention noise from aircraft movement on the site, the wall, or Condition 45.

Condition 45 requires that plans show a masonry wall six feet in height replacing the fence between the eastern edge of Hangar 5 and the southeast corner of Hangar 1. Staff has confirmed that Condition 45 accurately implements the motion. The condition replaces an existing fence that begins at the southeast corner of Hangar 5, runs northeast along a portion of the NE Brookwood Parkway frontage, turns north, crosses the gated vehicular

entrance, and terminates at the southeast corner of Hangar 1. The site entrance referenced in the motion is a point along that alignment rather than a terminus. The condition and the motion describe the same wall in the same location.

Applicant's response. The adopted written findings are the decision, and they find Criterion 7.e met. Remarks made in the course of deliberation are not the decision, and a written order is not required to transcribe every deliberative statement.

Staff position. Staff does not adopt the applicant's response on this issue.

The language at issue is not a deliberative remark. It is the operative text of the motion, seconded and adopted by vote. The Commission voted to approve the application with an additional finding under Criterion 7.e and with a condition to address what that finding identified. Exhibit A carries the condition. Exhibit B does not carry the finding. The written order does not reflect what the Commission adopted.

Richmond is correct that the written order is incomplete in this respect. She is correct in a second respect she did not raise. As stated in Section V, Exhibits C and D were not attached to the order as issued.

Staff does not agree that either deficiency defeats approval. Richmond is correct that approval requires all applicable criteria to be satisfied. The Commission's motion does not conflict with that requirement. CDC Section 12.70.120.A provides that conditions of approval are imposed to ensure that a proposal complies with the relevant approval criteria and the relevant standards of the Code, and to mitigate the impacts of the development. Subsection A.2.b lists screening or fencing among the conditions available on a Type III application. The Commission found that impacts were not sufficiently minimized as the application then stood, imposed Condition 45 to minimize them, and approved on that basis. Read as a whole, the motion approves the application as conditioned, not despite an unmet criterion. What the order fails to do is state that reasoning in writing.

Whether Condition 45 in fact sufficiently minimizes the impacts the Commission identified is a question for the Council to decide on this record. Staff's position is that it does, for the reasons stated in the recommended finding under Criterion 7.e. Richmond asserts otherwise and may present evidence and argument on the point. Because this hearing is de novo, the Council is not confined to the evidence the Commission had when it imposed the condition.

The order the Council adopts states a finding under Criterion 7.e that identifies the impact the Commission identified, being noise and visual impact from aircraft movement within the site along its most open street-facing edge, states that Condition 45 addresses that impact, and concludes that the criterion is met as conditioned.

On Richmond's assertion that the condition was imposed without opportunity for comment, this hearing is de novo. Any party may submit evidence and argument on the feasibility, safety, and regulatory compliance of the wall, and on whether it sufficiently minimizes the impacts identified. That opportunity is available to all parties on August 18.

On Barnes Argument 6, the Commission reached the same concern the argument identifies and responded to it with Condition 45. Whether the condition suffices will properly be decided by the Council.

Issue 9. Record completeness and public availability

Appellants' assertion. Richmond asserts that multiple days of public testimony are missing from the record, and that the timing of the release of public comments did not allow Commissioners to have adequate time to review written testimony, with no adjustment to the schedule. Richmond identifies four items as not in the record and/or not appearing on the publicly available Planning Commission meeting page: (1) written testimony submitted April 7, 2026 and May 26, 2026; (2) an applicant submittal from May 4, 2026; (3) the FAA Final Hillsboro Airport Documented Categorical Exclusion; and (4) the FAA decision page stamped received by the City on April 8, 2026.

Richmond further asserts that the FAA decision page was submitted by the applicant but not made available to the public during the proceedings, that the underlying Categorical Exclusion was never provided to the Commission or the public, that a public records request submitted May 15, 2026 was fulfilled by the Port of Portland on June 3, 2026, and that 140 pages had been withheld. She asserts this was inconsistent with CDC Section 12.70.010.A.2, and that the City failed to exercise its authority under CDC Section 12.70.110.D.8.d to require additional technical reports.

What the record shows. Four items of testimony received April 7, 2026 are in the record at Supplemental Staff Report No. 1. Approximately thirty items received May 26, 2026 are in the record, distributed between the compilation of testimony received May 22 through May 26 provided to the Commission at the May 27 hearing and Supplemental Staff Report No. 6. The applicant's revised application is in the record as an attachment to Supplemental Staff Report No. 4. The FAA decision, signed March 6, 2026 and received April 8, 2026, is in the record. The full Documented Categorical Exclusion was not in the Planning Commission record. It is in the record before the Council, submitted as testimony by an appellant.

Testimony received between May 16 and May 27, 2026 reached the Commission in three packets. Supplemental Staff Report No. 5, dated May 27, transmits testimony received May 16 through May 25. Supplemental Staff Report No. 6, dated May 27, transmits testimony received May 24 through May 27. The compilation of testimony received May 22 through May 26 was provided to the Commission at the hearing. The hearing was held May 27, 2026. Each supplemental staff report was posted to the public meeting page on the date it bears.

CDC Section 12.70.010.A.2 states that a purpose of the procedures subchapter is to enable the public to effectively participate in the local decision-making process. CDC Section 12.70.110.D.8 provides that within 14 days after the submittal of an application the Director may require an applicant to submit additional technical reports upon a determination that one of four circumstances is present, including at subparagraph d that the proposal would likely result in significant adverse impacts with respect to noise, toxic or noxious matter, vibrations, odors, heat, glare, air pollution, wastes or other objectionable effects. The Categorical Exclusion application was submitted December 1, 2025. That period closed in mid-December 2025, before notice was mailed on March 4, 2026 and before any public testimony was received.

Applicant's response. The applicant has not responded to this issue.

Staff position. Three of the four items Richmond identifies were in the Planning Commission record. Only the full Documented Categorical Exclusion was not, and it is now before the Council.

Staff does not treat that as disposing of the issue. Richmond's assertion is framed in the alternative, and her stated harm is the inability to review and respond to the alleged missing items during the proceedings. That harm does not depend on an item being absent from the record. It depends on when the item became available.

On that question, staff acknowledges the compression. Testimony received over an eleven-day span reached the Commission on the day of the hearing, across three separate packets, two of them dated May 27 and one distributed at the hearing. The FAA decision page likewise entered the record on the day of the April 8 hearing. Whether Commissioners had adequate time to review the decision, and whether parties had a practical opportunity to respond to it, are fair questions and staff does not dispute that the schedule made both difficult.

The volume of testimony rose sharply in the final two weeks. The supplemental report process exists to move late testimony into the record rather than exclude it. The alternative to a same-day packet is not an earlier packet. It is testimony that does not reach the Commission at all. That is a reason for the compression, not a cure for it.

The remedy is the hearing now before the Council. This appeal is de novo. Every document identified by the appellants is available to be reviewed and responded to on a schedule that provides notice and time, and any party may submit new evidence that was not before the Commission at all. The procedural deficiency the appellants identify is one the de novo hearing is designed to correct, and the Council's grant of a de novo hearing on both appeals reflects that.

On CDC Section 12.70.110.D.8.d, the authority to require additional technical reports is discretionary and is exercisable within 14 days after submittal of the application.

The Documented Categorical Exclusion is a determination made by the Federal Aviation Administration on an application submitted by the Port of Portland under the National Environmental Policy Act. It is not an approval criterion under the CDC. Richmond's assertion that responses in the application were inaccurate or misleading is a challenge to a federal agency determination and to a Port submittal, and it is not resolved in this proceeding.

Issue 10. CDC Section 12.80.040.H.7.f

Appellants' assertion. Richmond asserts that a subsection (f), addressing unreasonable impacts on surrounding properties, exists at CDC Section 12.80.040.H.7 and that no findings address it.

What the record shows. The additional criteria for non-residential applications at CDC Section 12.80.040.H.7 consist of subparagraphs a through e. There is no subparagraph f.

Applicant's response. The applicant has not responded to this issue.

Staff position. The argument fails on its premise. No findings are required under a subsection that does not exist. Staff notes that the substance Richmond describes, unreasonable impacts on surrounding properties, is addressed by Criteria 7.d and 7.e, both of which are before the Council.

VI. RECOMMENDATION

Planning Division staff recommends that the City Council deny APPEAL-001-26 and APPEAL-002-26, affirm the decision under appeal with the changes described below, and adopt an order containing the Council's findings of fact, conclusions, and conditions of approval. Staff recommends that the Council affirm with the following changes.

Findings.

The order adopted by the Council states the Council's own findings of fact on each applicable approval criterion. Those findings differ from the findings at Exhibit B to Order No. 8492 in the following respects.

- Criterion 1 addresses the limitation on aviation uses at CDC Section 12.25.250.F and concludes that the limitation is satisfied because the leasehold is located on property owned by the Port of Portland at the Portland-Hillsboro Airport.
- Criterion 4 concludes that the standards of CDC Section 12.50.270 are met as conditioned and does not rely on hauler confirmation as satisfying the gate opening width standard at Section 12.50.270.D.2.b.
- Criterion 7.a concludes that the transportation system can safely and adequately accommodate the proposed development based on the evidence of intersection operation, site access, and the conditions requiring sight distance certification, removal of the existing unsignalized curb cut, and signal activation, rather than on the determination that a Transportation Impact Analysis was not required.

- Criterion 7.d identifies the Hillsboro Brookwood Library among the surrounding land uses, states its distance from the nearest aircraft ramp area, and addresses compatibility with it directly.
- Criterion 7.e states the negative impact identified by the Planning Commission, being noise and visual impact from aircraft movement within the site along its most open street-facing edge, states that Condition 45 addresses that impact, and concludes that the criterion is met as conditioned. This finding gives written effect to the additional finding contained in the Planning Commission's motion of May 27, 2026.
- Procedural findings address the notice radius at CDC Section 12.70.050.F.1.c and the neighborhood meeting requirements at CDC Section 12.70.100.
- A finding addresses CDC Section 12.01.130 and the scope of the approval criteria for a Development Review, concluding that the applicable approval criteria are those at CDC Section 12.80.040.H and that Comprehensive Plan policies are implemented through the development standards of the CDC.

Conditions.

CDC Section 12.70.120.G.1 provides that modification of conditions of approval may be sought upon appeal of the original application pursuant to Subsection 12.70.180.E. Condition 32 is revised to read as follows.

Prior to issuance of the Private Utility Permit, plans shall show that each waste and recycling enclosure complies with the location, design, and access standards of CDC Section 12.50.270.D, including approach drives and storage areas paved at a slope no greater than 3 percent, hauler gate openings of not less than 12 feet in width capable of being secured in both closed and open positions, and an accessway providing not less than 12 feet horizontal clearance and 20 feet vertical clearance for its full length. Compliance to be verified by the Planning Division.

All other conditions of approval, including Condition 45, are carried forward without change.

Exhibits.

The order includes each exhibit recited within it.

Attachments:**A. Site Plans**

- Revised Site Plan
- Original Site Plan

B. Draft City Council Order

- Exhibit A Conditions of Approval

- Exhibit B Findings of Fact
- Exhibit C Tax Map
- Exhibit D Partial Plan Set

C. Land Use Appeal Application, APPEAL-001-26, Barnes et al., June 17, 2026

- Application Form
 - Appellant Details, Miki Barnes
 - Appellant Details, Trevor Southard
 - Appellant Details, Linda Howey
 - Appellant Details, Karna Sheth
 - Appellant Details, Blaine Ackley
 - Appellant Details, Helen Krieger
 - Appellant Details, Greg Driscoll
 - Appellant Details, David Barnes
 - Appellant Details, Christopher Bockstahler
- Notice of Appeal Supplemental Statement, Attachment A
- Testimony, Attachment B

D. Land Use Appeal Application, APPEAL-002-26, Richmond et al., June 17, 2026

- Application Form
 - Appellant Details, Sarah Richmond
 - Appellant Details, Brett Hamilton
 - Appellant Details, Valerie Pratt
- Narrative with Email and Testimony, Ex A
- Emails, Ex B-1, Attachment C
- Formal Objection, Dirk Knudsen, April 7, 2026, Ex B-2

E. Appellant and Applicant Testimony

- Letter from Steven P. Hultberg, Radler White Parks & Alexander LLP, on behalf of the applicant, July 30, 2026
- FAA Final Hillsboro Airport Documented Categorical Exclusion, Port of Portland, February 26, 2026, transmitted by Brett Hamilton, July 29, 2026
- Email from Brett Hamilton, July 28, 2026, with attachment

F. Testimony Received After Appeal Public Notice

- Email from Ashley Mead, received July 30, 2026
- Email from Amy King, received July 30, 2026
- Email from Leslie Logan, received July 30, 2026
- Email from Nancy Post, received July 30, 2026
- Email from Joyce Herres, received July 30, 2026
- Email from Liesl Sieger, received July 30, 2026, with attachment
 - Article, KGW, Hillsboro Airport leads in close calls, safety risks on runways in the Northwest, by Evan Watson, published June 1, 2023
- Email from Liesl Sieger, received July 30, 2026

- Email from Todd and Meg Griswold, received July 30, 2026
- Email from Jennifer S. Moore, received July 30, 2026
- Email from Grace Backen, received July 30, 2026
- Email from Michael E. Turk, received July 30, 2026
- Email from Susanne Domhan, received July 30, 2026
- Email from Addison L. Price, received July 30, 2026
- Email from Suzanne Kailasam, received July 29, 2026
- Email from Chantay Glanville, received July 29, 2026
- Email from Justine Ellis, received July 29, 2026
- Email from Mindy Haroon, received July 29, 2026
- Email from Nadia Hasan, received July 29, 2026
- Email from Richard Green, received July 29, 2026
- Email from Marilyn Arp, received July 29, 2026
- Email from Kayla Neely, received July 29, 2026
- Email from Adam Guerechit, received July 29, 2026
- Email from Ayush Malakar, received July 29, 2026
- Email from Shawna Bodio, received July 29, 2026
- Email from Flemming Andersen, received July 29, 2026
- Email from Sofia Hussain, received July 29, 2026
- Email from Colleen Larson, received July 29, 2026
- Email from Jim Bodio, received July 29, 2026
- Email from Scott Carpenter, received July 29, 2026
- Email from James Martin, received July 29, 2026
- Email from Heather Long, received July 29, 2026
- Email from Unnamed Person (jlbares63), received July 29, 2026
- Email from Kevin Bodtker, received July 29, 2026
- Email from Tressa Kovachevich, received July 29, 2026
- Email from Erin Robbins, received July 29, 2026
- Email from William and Jeannie Sully, received July 29, 2026
- Email from Sheila Christensen, received July 29, 2026
- Email from Eric Westby, received July 29, 2026
- Email from Hernandez Family, received July 29, 2026
- Email from Valerie Peterson-Barnes, received July 29, 2026
- Email from Scott and Tracey Etzel, received July 29, 2026, with attachment
 - Comments, Scott and Tracey Etzel
- Email from Peter Buck, received July 29, 2026
- Email from Anastasiia Prystinska, received July 29, 2026
- Email from Max Kaliberda, received July 29, 2026
- Email from Matthew Reynolds, received July 29, 2026
- Email from Cynthia Westby, received July 29, 2026
- Email from Kathie Brown, received July 29, 2026
- Email from Atharva Deepak, received July 29, 2026
- Email from Given Harrison, received July 29, 2026
- Email from Carol Miller, received July 29, 2026

- Email from John E. Bartley, III, received July 29, 2026
- Email from Kathryn Carlson, received July 29, 2026
- Email from Atharva Deepak, received July 29, 2026
- Email from Paul Kohnhorst, received July 29, 2026, with attachment
 - Public Comment, Paul Kohnhorst
- Email from Frank Hiebel, received July 29, 2026
- Email from Ryan Surface, received July 29, 2026
- Email from Vladimir Grachev, received July 28, 2026
- Email from Deborah Curtis, received July 28, 2026
- Email from Anita Hiebel, received July 28, 2026
- Email from Sally Hildebran, received July 28, 2026
- Email from Lorne Dyke, received July 28, 2026, with attachment
- Email from Leza Sands, received July 28, 2026
- Email from Cody Gradone, received July 28, 2026
- Email from Tracy Schlanser, received July 28, 2026, with attachment
- Email from Ashlee Peters, received July 28, 2026
- Email from Judy Sell, received July 28, 2026
- Email from Jason Woodcock, received July 28, 2026
- Email from Heather Ferrin-Myers, received July 28, 2026
- Email from Ryan T. Maas, received July 28, 2026
- Email from Warren D. Shields, received July 28, 2026
- Email from Teresa T. Goodell, received July 28, 2026
- Email from Kristy and Marshall Hewitt, received July 28, 2026
- Email from Dustin Cole, received July 28, 2026
- Email from Tracy Schulz, received July 28, 2026, with attachment
- Email from Unnamed Person (dhnicoemus), received July 28, 2026
- Email from Bruce Klein, received July 28, 2026
- Email from Elena Gart, received July 28, 2026
- Email from Emma Piccillo, received July 28, 2026
- Email from Barbara Olvera, received July 28, 2026
- Email from Andrew and Kirsten Losli, received July 28, 2026
- Email from Rick Cummings, received July 28, 2026
- Email from Hazen Hyland, received July 28, 2026
- Contact the Mayor and/or City Council form submission from Rebecca Lofthouse, received July 13, 2026
- Contact the Mayor and/or City Council form submission from Theresa Baird, received July 13, 2026
- Contact the Mayor and/or City Council form submission from Christian Robertson, received July 10, 2026
- Contact the Mayor and/or City Council form submission from Patrick Snow, received July 8, 2026
- Email from Jerrod Hill, received July 7, 2026
- Email from Vern Pursley, received July 7, 2026

G. Testimony Received After the Planning Commission Decision

- Email from Scott Hewitt, received June 8, 2026
- Contact the City Manager's Office form submission from Scott Hewitt, received June 7, 2026
- Contact the Mayor and/or City Council form submission from Mary Hewitt, received June 5, 2026
- Contact the Mayor and/or City Council form submission from Christian Robertson, received June 5, 2026
- Email from Donna K. Urban, received June 2, 2026
- Email from Sarah Richmond, received June 2, 2026, with attachments
 - Procedural Concern, DEQ, May 26, 2026
 - Procedural Concern, Washington County, May 26, 2026
 - City Attorney Response, May 26, 2026
 - Procedural Concern, DLCD, May 26, 2026
- Letter from Andrea Moore, with petition signature pages, received June 2, 2026
- Email from Joseph Gillis, received May 28, 2026
- Email from Nicole Adams, received May 27, 2026

H. Planning Commission Record

- Table of Contents
- Materials

cc: Applicant

Emily Sandy, Strata Land Use Planning

David Annin, Sky Harbour

Steven P. Hultberg, Radler White Parks Alexander Attorneys at Law, LLP

Appellants, APPEAL-001-26, Barnes et al.

Miki Barnes

Trevor Southard

Linda Howey

Karna Sheth

Blaine Ackley

Helen Krieger

Greg Driscoll

David Barnes

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Addison L. Price
Suzanne Kailasam
Chantay Glanville
Justine Ellis
Mindy Haroon
Nadia Hasan
Richard Green
Marilyn Arp
Kayla Neely
Adam Guerechit
Ayush Malakar
Shawna Bodio
Flemming Andersen
Sofia Hussain
Colleen Larson
Jim Bodio
Scott Carpenter
James Martin
Heather Long
Unnamed Person (jlarnes63)
Kevin Bodtker
Tressa Kovachevich
Erin Robbins
William and Jeannie Sully
Sheila Christensen
Eric Westby
Hernandez Family
Valerie Peterson-Barnes
Scott and Tracey Etzel
Peter Buck
Anastasiia Prystinska
Max Kaliberda
Matthew Reynolds

Cynthia Westby
Kathie Brown
Atharva Deepak
Given Harrison
Carol Miller
John E. Bartley, III
Kathryn Carlson
Paul Kohnhorst
Frank Hiebel
Ryan Surface
Vladimir Grachev
Deborah Curtis
Anita Hiebel
Sally Hildebran
Lorne Dyke
Leza Sands
Cody Gradone
Tracy Schlanser
Ashlee Peters
Judy Sell
Jason Woodcock
Heather Ferrin-Myers
Ryan T. Maas
Warren D. Shields
Teresa T. Goodell
Kristy and Marshall Hewitt
Dustin Cole
Tracy Schulz
Unnamed Person (dhnicodemus)
Bruce Klein
Elena Gart
Emma Piccillo
Barbara Olvera
Andrew and Kirsten Losli
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