



August 17, 2026

VIA email to council@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,

Neighbors for Clean Air is a statewide organization that works to ensure that every Oregonian has clean and healthy air to breathe. Thank you for the opportunity to comment on the Sky Harbour appeal.

Neighbors for Clean Air 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 the appellants have properly outlined, the application fails to meet City criteria, including various sections of the Community Development Code (CDC). Specifically, the Planning Commission's conclusion that air quality lies outside the scope of local development review is counter to Hillsboro's Community Development Code (CDC) and dangerously dismissive of public health.

The Planning Commission has the authority and duty to evaluate the air pollution concerns associated with this permit application. The city staff's "Supplemental Staff Report No. 4" from May 20th responded to public concerns about the air pollution impacts of the project with the statement on page 6: "Air quality is not regulated by the CDC and is not within the scope of this development review." This statement echoes the conclusion that Strata Land Use Planning came to in their response to community comments on page 185 of this same staff report: "Air quality is not regulated by the HCDC and is not within the scope of this review." However, the local approval criteria under the Hillsboro CDC both explicitly and impliedly grants the City authority to review and mitigate 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 air pollution, the City cannot conclude these impacts have been minimized or mitigated.



The combination of these elements of the CDC, when taken together, contradict the staff's conclusion that air quality impacts from the proposed development are outside the scope of the review.

Ultimately, by failing to analyze these air pollution impacts, Hillsboro abdicated its responsibility to protect residents from the health risks posed by jet fuel. The staff's implication in the "Staff Report No. 4", that the use of Jet A fuel resolves public health concerns because it is lead-free, ignores critical scientific evidence on the impacts of jet fuel emissions. Jet A combustion generates massive quantities of UFPs (tiny 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 disease, pulmonary conditions like COPD, respiratory illness, and increased cancer risks in nearby communities.¹

Neighbors for Clean Air respectfully requests that DR-044-25 be denied. Thank you.

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¹ <https://cedelft.eu/publications/health-impacts-of-aviation-ufp-emissions-in-europe/>