

Dear Mayor Pace, Council President Harris, and Hillsboro City Council,

Thank you for the opportunity to provide additional material in support of our appeal. There is no dispute that Sky Harbour's proposed development must comply with both the City of Hillsboro's Comprehensive Plan and the Port of Portland's Hillsboro Airport Master Plan. As outlined below, Sky Harbour's application conflicts with both.

Hillsboro Airport Master Plan

The square footage of Sky Harbour Hangars totals 183,949 square feet which exceeds the Port of Portland's long-term forecast by more than 2.5 times, a dramatic overbuild relative to the HIO Master Plan.

The Port's total long term projection for additional hangar space at HIO is 73,000 square feet (see table 4V below). Sky Harbour exceeds this forecast by 110,949 sq ft.

HANGAR	W	L	SQ FT
1	268.25	160.25	42,987
2A	134.25	160.0	21,480
2B	134.25	160.0	21,480
3A	134.25	160.0	21,480
3B	134.25	160.0	21,480
4	268.25	160.25	42,987
5	100.25	120.25	12,055
TOTAL			183,949
HIO MP			73,000
DIFF			110,949

Table 4V presents aircraft storage needs based on the demand forecasts. Estimates indicate a long-term need for an additional 73,000 square feet of aircraft storage space to accommodate the forecast growth at the Airport.

TABLE 4V
Hangar Needs
Hillsboro Airport

	Currently Available	Short Term	Intermediate Term	Long Term	Total Need Less Current Supply
Based Aircraft	354	375	395	445	
Aircraft to be Hangared	301	319	336	378	77
T-Hangar Positions	182	158	165	182	0
Box Hangar Positions	25	49	51	58	33
Conventional Hangar Positions	170	113	120	138	-32
Hangar Area Requirements					
T-Hangar Area	219,500	221,000	230,000	255,000	35,500
Box Hangar Area	60,900	107,000	113,000	127,000	66,100
Conventional Hangar Area	373,600	282,000	300,000	345,000	-28,600
Total Storage Area (s.f.)	654,000	610,000	643,000	727,000	73,000
Maintenance Area	52,200	66,000	69,000	78,000	25,800

Source: Coffman Associates analysis.

During testimony on August 18, the applicant stated that the Sky Harbour proposal for additional hangars was inline with the increase for hangars as per the Comprehensive Plan. As you can see, this project far exceeds the Port's forecast.

Hillsboro Comprehensive Plan

The applicant is required to follow the Comprehensive Plan per CDC 12.01.130: "All use or development of land or structures within the City limits of Hillsboro shall comply with the Hillsboro Comprehensive Plan, the Hillsboro Municipal Code, and applicable regional, State, Federal and local laws." Below are policies from the Comprehensive Plan that Sky Harbour's application does not comply with.

Section 10 Noise Management

"Noise pollution can negatively impact quality of life and can contribute to a number of health issues, including stress, headaches, and sleep loss. Noise may become a disturbance when it reaches certain levels of intensity (amount of sound), frequency (rate of recurrence), or duration (length of occurrence), or when it is present at certain times of day. By national standards, noise is considered to be noise pollution when it becomes an unwanted or disturbing sound that negatively impacts quality of life or contributes to noise-related health issues. Statewide Planning Goal 6 includes noise as a consideration for maintaining land quality" (Page 158)

POLICY NM 1.6 (p 161) Noise management coordination. Coordinate noise management efforts across City departments and with other entities, including the Port of Portland

Section 17 Air Quality (pp 231 to 240)

"Clean air plays an important role in a healthy community and a sustainable environment. While recent rapid growth has impacted the tenuous balance between increasing development and maintaining air quality"

"The City is committed to protecting our resources so that residents and employees have clean air to breathe."

"Local governments are required to ensure that pollutant and greenhouse gas emissions from existing and future developments do not violate State or Federal pollution and public health standards or threaten air quality. Many pollutants have

harmful short- and long-term health effects that are especially dangerous for children, seniors, and people with existing lung and heart conditions.”

- **POLICY AQ 1.1** (p 235) Air pollutants. Incorporate best practices for improving air quality and community health into City planning and investment decisions in order to continue to meet and, where feasible and practicable, strive to exceed federal and state air quality standards for criteria pollutants and toxic air contaminants.
- **POLICY AQ 1.2** (p 235) Greenhouse gas emissions. Strive to reduce greenhouse gas emissions that adversely affect public health and contribute to climate change.
- **POLICY AQ 1.3** (p 235) Volatile organic compounds. Promote strategies to minimize the use of volatile organic compounds posing a significant risk to community health and affecting both outdoor and indoor air quality.
- **POLICY AQ 3.6** (p 237) Sensitive populations. Mitigate the health risks of criteria pollutants, toxic air contaminants, and odors to sensitive populations by considering potential impacts when siting sensitive populations or pollutant-emitting land uses.
- **POLICY AQ 3.7** (p 237) Disproportionate impacts. Address and prevent disproportionate impacts from pollutant sources on any segment of the community, including communities of color, low-income populations, and other under-served or under-represented groups.
- **POLICY AQ 4.1** (p 238) Interagency coordination. Coordinate with the Oregon Department of Environmental Quality, Washington County Department of Health and Human Services, the Port of Portland, and other local jurisdictions on existing programs and in developing future strategies for improving air quality, including initiatives such as managing wood burning emissions.

As shown above, Sky Harbour conflicts with the City’s Comprehensive Plan and the Port’s Airport Master Plan, which is a part of the Comprehensive Plan. For these reasons, we respectfully request that the City Council grant our appeal.

Thank you,

Sincerely,
Sarah Richmond
Brett Hamilton
Valerie Pratt