

NOTICE OF APPEAL SUPPLEMENTAL STATEMENT

City File Number: DR-044-25 (Planning Commission Order No 8492)

Date of Notice of Decision: June 2, 2026

The issues Appellants intend to raise in this appeal include, but shall not be limited to, the following:

- 1) CDC 12.70.050(F)(1)(c): Notice of the Planning Commission's meeting was not provided to owners of record for all properties within "500 feet of the perimeter property line of the property or properties subject to the application." By definition, this is a property-edge to property-edge measurement and the property subject to this application as stated in the Planning Commission's order is the 414.75 acre Port of Portland-owned site.
- 2) CDC 12.70.100(C)(2): The neighborhood meeting requirement was not satisfied because the noticing area failed to comply with CDC 12.70.050(F)(1)(c) for the reasons stated above.
- 3) CDC 12.01.130: The Planning Commission failed to apply this criterion which applies to "all use or development of land or structures within the City limits." A number of comprehensive plan policies are violated and the Planning Commission made no findings in response.
- 4) CDC Section 12.80.040(H)(7)(a): Whether the amount of traffic triggers the need for a Transportation Impact Analysis is not responsive to this criterion. There is no evidence that the additional traffic can be safely and adequately accommodated.
- 5) CDC Section 12.80.040(H)(7)(d): The Planning Commission finding that the "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 it inappropriately constrained the analysis to the airfield activities to the west.
- 6) CDC Section 12.80.040(H)(7)(e): 24-hour access-controlled operations imposes no functional limit on the intensity of this use and its impacts. An airplane housed in this development could make multiple flights per day without constraint generating traffic, noise, air pollution and carbon emissions without restraint.

Appellants request that review of this appeal be considered on the record.