

Date: January 29, 2026

To: Portland Permitting & Development
1900 SW 4th Avenue, Suite 5000
Portland, OR 97201

From: Emily Sandy, 503-317-3548

Re: **Case File No. DR-044-25 Sky Harbour Hangars**

Dear Leslie Hamilton,

Please accept this memo and revised attachments in response to your December 19, 2025, letter deeming the application incomplete. The requested information is provided, and we request the application be deemed complete.

Revisions include the following changes:

- A slight change to the size of the fuel farm and inclusion of a 2,360 square foot canopy over a portion of the fuel farm as a result of further work with fueling contractors and engineers.
- The addition of a publicly accessible plaza adjacent to the NE Brookwood Parkway right of way flanking the northernmost pedestrian accessway from the street into the site.
- Inclusion of solar panels on the roof of the GSE building to meet CFEC standards.

From your letter, with applicant responses:

- 1. Public Benefit Standards (Updated):** The Public Benefit standards of CDC 12.50.900 were amended in January 2025, but the updated version is not reflected in the on-line version of the Development Code. The significant changes include clarifying that a Public Benefit must provide an amenity (site or building) that is above the base code standard, and updating the codified list of enhanced elements to be more objective. For instance, a CPTED benefit must be accompanied by an assessment from a certified professional; however, as the site is not open to the general public, it would be difficult to demonstrate a benefit based on CPTED principles. Please submit an updated narrative that addresses the current CDC. A copy of Ordinance 6493 is attached.

Response: *A revised narrative that incorporates the updated code per Ordinance 6493 is submitted.*

- 2. CFEC:** Please upload a site plan that clearly illustrates compliance with the canopy coverage standards of CFEC, including specific tree types and location.

As the City has not set up a FIL fund, compliance must be based on either (1) 30% canopy coverage and solar panels, or (2) 40% canopy coverage.

Response: *This was included in the original application as part of the landscape plans on sheet L301. However, revised landscape plans including some changes to plantings and a new publicly accessible plaza are now submitted. 30.7% canopy coverage is demonstrated on Sheet L301 of the revised landscape plans.*

The applicant will pursue solar panels instead of the fee in lieu or 40% canopy coverage. Panels will be located on the roof of the GSE building between Hangar 5 and the fuel farm, behind the security fence. The area of these panels is reflected on a revised roof plan and shown in the updated renderings. It is also discussed in the revised narrative.

3. Cumulative impact of Major Adjustments; Public Benefit: The cumulative impact of the requested Adjustments is significant along the Brookwood frontage, as parking is located in front of the hangars, the front setback is not increased, and the required landscaped buffer is reduced. The narrative and plans do not illustrate a compensating Public Benefit that balances the scale and concentrated location of the Adjustments.

Response: *A new publicly accessible plaza is proposed adjacent to the NE Brookwood Parkway right of way, flanking the northernmost pedestrian accessway into the site. This is addressed in the revised narrative, revised landscape plans, revised civil drawings, and revised renderings.*

Summary of Revised Documents:

A.2 Narrative

- Revised public benefit standards 12.50.900.
- General revisions relating to the newly proposed publicly accessible plaza.
- General revisions to include a 2,300 square foot canopy over the containment area of the fuel farm and a slight change to size of fuel farm.
- Revisions relating to solar panels to meet CFEC requirements discussed above.

C.1 Overall Site Plan

- Addition of the newly proposed publicly accessible plaza
- Slight revisions to the size of the fuel farm and a 2,300 square foot canopy over the containment area of the fuel farm.

C.3 Civil Plans (including grading and utility plans)

- Addition of the newly proposed publicly accessible plaza
- Slight revisions to the size of the fuel farm and a 2,300 square foot canopy over the containment area of the fuel farm.
- As requested, all of the civil plans are now uploaded sheet-by-sheet in the Drawings Category instead of in one plan set in the Documents category.

C.4 and C.5 Architectural Plans

- Revision to the roof plan of the GSE building showing location of proposed solar panels.
- As requested, all of the architectural plans are now uploaded sheet-by-sheet in the Drawings category instead of in one plan set in the Documents category.

Superfluous sheets not necessary for the land use review (for example, interior and structural details and plans) have been removed.

C.6 Landscape Plans

- Revisions to some plant materials.
- Inclusion of the newly proposed publicly accessible plaza.
- As requested, all of the landscape plans are now uploaded sheet-by-sheet in the Drawings category instead of in one plan set in the Documents category.

C.10 (New) Renderings

- Inclusion of the newly proposed publicly accessible plaza, updates to plant materials.
- Prior renderings were included at the end of the originally submitted architectural set and are now pulled out as a separate Document for convenience.

C.11 (New) Fuel Farm Canopy Detail

- Basis of design showing configuration and materials of the newly proposed canopy over a portion of the fuel farm.

Please deem this application complete. We look forward to working with you as the application progresses.