

**Application Narrative to City of Hillsboro
Type III Development Review
Sky Harbour Hangars
Revised Partial Narrative, May 4, 2026**

Table of Contents

Revisions.....	2
Site Information	2
Proposal.....	2
Development Summary	2
Requested Reviews.....	3
Site Activity Statement	3
Phasing	4
Approval Criteria and Development Standards Summary	6
Use and Development Standards	7
12.25.200 I-P Industrial Park Zone	7
12.50.200 Site Design	10
12.50.300 Vehicle Parking	15
12.50.400 Bicycle Parking/Bicycle and Pedestrian Circulation and Connectivity	20
12.50.600 Public Utilities, Site Grading and Storm Water Management Facilities Site Integration	23
12.50.800 Design Standards for Non-Residential and Mixed-Use Development.....	24
Development Review Approval Criteria	27
12.80 Applications	27
12.50.900 Public Benefit Standards	30
Conclusion.....	31

Revisions

This narrative is not revised in its entirety. At the recommendation of staff, only the parts of the narrative that are affected by the revised proposal are contained in this document. In some cases, this means only references to hangar numbers or the site acreage have changed. In other cases, the entire response has been revised. Additionally, sections relating to Adjustments have been removed altogether, since Adjustments are no longer requested.

Site Information

- The site is an area leased by Sky Harbour Group from the Port of Portland.
- The leasehold area is 13.70 acres (596,638 square feet), abutting NE Brookwood Parkway to the east.
- The map and taxlot number is #1N2280001550.

Designations

- The site is located in the I-P Industrial Park Zone.
- The taxlot is located within the North Hillsboro Industrial Area Plan District; however the leasehold is not located within the plan district, therefore the plan district is not addressed.
- The leasehold area is 13.70 acres, abutting NE Brookwood Parkway to the east.
- The leasehold contains no floodplains, wetlands, significant natural resources, cultural resources, nor any slopes 25% or greater. The site is generally flat.
- NE Brookwood Parkway is classified as an **Arterial Street** with an existing **Trail** designation per the 2022 Transportation Systems Plan (TSP). In addition, this frontage is a **Washington County Truck Route** and a **Major Emergency Response Route**. NE Brookwood Parkway is also a **Major Pedestrian Route** and a **Major Transit Route** as shown in Figure 12.01.500-G. There is a nearby **Major Transit Stop** at the signalized intersection of NE Brookwood Parkway and NW Airport Road.

Proposal

Development Summary

The proposal is for a private development of private aircraft hangars on a 13.70-acre area leased by Sky Harbour Group from the Port of Portland. It consists of:

- Seven private aircraft hangars in 7 separate buildings meeting separation requirements of the building code and fire code. Hangars are labeled 1-5, with Hangars 2a, 2b, 3a, and 3b being four separate, but similar building types. Hangars will accommodate approximately 30 aircraft total.
- Accessory office and customer lounge space. No overnight lodging will occur.
- A ground support equipment (GSE) building attached to Hangar 4.
- Aircraft ramp area.
- A fuel farm (above ground) with partial canopy over fuel containment area.
- Sixty vehicle parking spaces.
- Vehicle access via private driveway from NW Airport Road driveway.
- Closure of existing curb cut and driveway access from NE Brookwood Parkway.
- Two trash and recycling storage areas.
- Associated landscaping, pedestrian connections, and fencing.
- Publicly accessible plaza and respite area adjacent to NE Brookwood Pkwy.
- No loading spaces are proposed; overhead doors on the pedestrian sides of the hangars are “nose notches” that allow for maneuvering and parking of aircraft within the hangars or for controlled access of ground support equipment (GSE) equipment into the hangars.

Requested Reviews

1. **Type III Development Review**
2. **Adjustment Reviews are no longer requested. Plans have been modified to meet all standards.**

Site Activity Statement

Sky Harbour Group is a private developer and operator who has leased the development site from the Port of Portland. Sky Harbour currently has 9 campuses in operation and 14 campuses in development nationwide.

- Home Base operator with the aircraft assigned a home base for storage, fueling, servicing, etc. and distinguished from a fixed base operator which serves transient aircraft customers.
- Sub-lessors may be private individuals or business and corporate aircraft owners.
- Sub-lessors may lease space for one aircraft, or lease an entire hangar for multiple aircraft.
- Employees will have access to golf carts to maneuver around the large site for easier access to areas like waste and recycling storage areas.
- The campus has controlled access for tenants, employees and other users of the aircraft only. The facility is accessible 24 hours a day and does not operate on a typical 8 am – 5 pm schedule, or any fixed schedule.
- Users include aircraft owners and passengers, pilots, flight attendants, and ramp and line crews. Not all tenants or employees will be on the property every day. Pilots and passengers may arrive at the site, depart on a flight and return several days later when they return with the aircraft. Also, there may be extended periods of time where users of a particular aircraft do not visit the site at all.
- There are no planned shifts, rather use of the site is on-demand as needed by tenants.
- Based on the Trip Generation Memo, and based on employee data from similar campuses, the employee projections are:
 - Two pilots per aircraft
 - One mechanic for every two aircraft,
 - One scheduled guest/support crew for every two aircraft.
- The trip generation calculations project up to 90 daily vehicle trips. However, this is a worst-case trip generation scenario, where 100 percent of the jets are active on a given day. The hangars are typically expected to have approximately 60 percent of jets active at one time; therefore the expected daily trips to the site are expected to be less than the maximum estimate.
- Minor mechanical work such as windshield or wheel replacement or the like may occur. However, no major maintenance will be occurring on-site, and there are no mechanical “shop” areas on the site.
- No loading spaces are proposed; overhead doors on the pedestrian sides of the hangars are “nose notches” that allow for maneuvering and parking of aircraft within the hangars.
- Fire truck access is provided with adequate driveways and truck turnarounds.
- The buildings and the site plan will meet applicable building and fire code standards for hazard management and life safety.

- No industrial wastes are anticipated; there is no manufacturing or other activities that produce waste. There may be minimal amounts of waste fuel. This is typically stored in 55 gallon barrels on secondary containment pallets and ultimately disposed of via an agreement with an appropriate disposal company. Additionally, spill kits will be located throughout the facility.
- There are no major impacts on traffic, glare, landscape buffering or other items regulated by the Hillsboro Community Development Code or air pollution to warrant any mitigations measures.

Phasing

The project will be constructed in 2 phases as shown in the phasing plan.

This proposal is to construct the project in two phases. As allowed under 12.70.140, a “different period of time” is proposed for the permitting and construction schedule.

The request for phasing is due to the size of the leasehold (13.70 acres), the need to appropriately manage market availability, and to phase the investment expenditures to construct the initial four hangars; as the demand for additional hangars is increased, the site readiness provides the capability to respond quickly with the construction of the remaining three hangars (Hangars 1, 2a and 5).

Sky Harbour’s lease with the Port of Portland specifies that Phase II construction shall begin no later than the 5th anniversary of the certificate of occupancy for Phase I. This agreement builds in flexibility and it is likely that Phase II will be completed before that time. A phasing plan is proposed as follows:

Phase I

- Hangars 2b, 3a, 3b, 4, and GSE building
- Private interior access driveway from NW Airport Road parallel to Brookwood Pkwy.
- Fuel Farm
- Vehicle parking east of hangar 4; access driveway to hangars 4 and 5
- Vehicle parking west of hangars 2b, 3a, and 3b; temporary access driveway to hangars 2b, 3a and 3b.
- One temporary trash and recycling storage area enclosure west of future hangar 2a.
- Landscaping within Phase I boundary
- Temporary security fence including fuel farm

Phase II

- Hangars 1, 2a, and 5
- Hangar 5 is within the geography of Phase I, but will be constructed during Phase II.
- Vehicle parking west of hangars 1 and 2a, permanent access driveway to hangars 1, 2a, 2b, 3a, and 3b.
- Additional permanent trash enclosure which will be sized to accommodate both Phase I and Phase II
- All site landscaping
- Final security fencing

Proposed Phasing Timeline

- **Phase I:** Substantial construction to begin within 2 years of land use approval, consistent with expirations of decisions stated in 12.70.140.A and Table 12.70.140-1. In reality, construction is planned to begin immediately after land use approval and issuance of permits.
- **Phase II:** Construction to begin no later than 5 years after the certificate of occupancy of buildings in Phase I. In reality, construction on Phase II is planned to begin immediately after construction of Phase I is completed. However, this timeline provides for flexibility resulting from unforeseen circumstances.
- **Phase I and Phase II Completion:** Both phases complete and all certificates of occupancy obtained no later than 10 years from land use approval. In reality, construction on Phase II is planned to begin immediately after construction of Phase I is completed. However, this timeline provides for flexibility resulting from unforeseen circumstances.

Approval Criteria and Development Standards Summary

The revised proposal affects the following standards and approval criteria. **Again, only standards that are affected by the revised proposal are contained here. Discussion** of each code section, their applicability, and how the proposal meets requirements follows in the remainder of this narrative.

12.25.200 Industrial Park (I-P) Zone

12.25.260 Development Standards

12.25.270 Variances and Adjustments

12.25.280 Other Pertinent Regulations

12.50.200 Site Design

12.50.220 Landscaping

12.50.240 Exterior Lighting

12.50.250 Fences, Free-Standing Walls, Hedges and Berms

12.50.260 Sight Distance/ Vision Clearance

12.50.270 Waste and Recycling Facilities

12.50.300 Vehicle Parking

12.50.320 Number of Spaces

12.50.360 Vehicle Parking and Loading: Design and Improvements

12.50.400 Bicycle Parking/Bicycle and Pedestrian Circulation and Connectivity

12.50.420 Pedestrian and Bicycle Circulation

12.50.430 Connectivity and Design Standards at or near Transit Stops

12.50.600 Public Utilities, Site Grading and Storm Water Management Facilities Site Integration.

12.50.640 Storm Water Facilities Site Integration

12.50.800 Design Standards for Non-Residential and Mixed-Use Development

12.50.820 Main Entries

12.50.850 Improvements and Activities between Streets and Buildings

12.50.890 Utilitarian Functions

12.80.100 Applications

12.80.040.H Development Review Approval Criteria

12.50.900 Public Benefit Standards.

12.50.910 Purpose and Applicability

Use and Development Standards

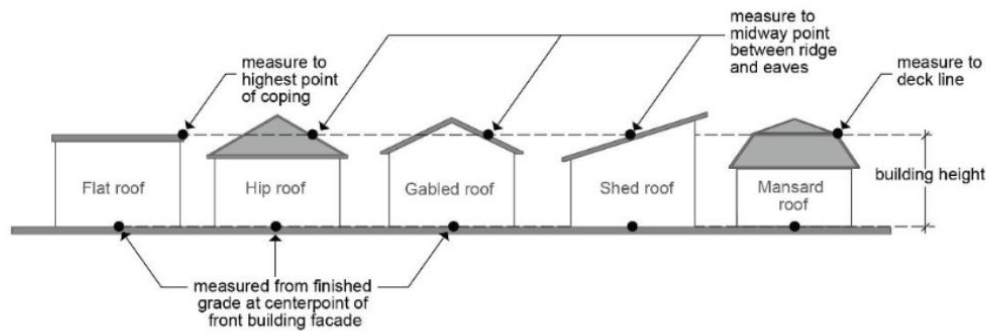
12.25.200 I-P Industrial Park Zone

12.25.260 Development Standards.	Applicant Response
Base zone development standards in the I-P zone are listed in Table 12.25.260-1. Certain standards are illustrated in Figure 12.25.260-A.	See applicant response in the right hand column of Table 12.25-260-1, below.

Table 12.25.260-1 Development Standards in the I-P Zone			
Standard	Requirement	Clarifications	Applicant Response
Minimum Lot Size	None		Met
Maximum Lot Size	None		Met
Minimum Density	Not applicable		Not applicable
Maximum Density	Not applicable		Not applicable
Minimum FAR	Not applicable		Not applicable
Maximum FAR	Not applicable		Not applicable
Minimum Lot Dimensions			
• Width (at front building plane)	None		Met
• Depth	None		Met
• Frontage	25 feet		Met
Minimum Setbacks*			
• Buildings up to 45 feet high ○ Front ○ Side ○ Rear	35 feet 10 or 25 feet 10 or 25 feet	See also Subsection 12.25.280.B.1 regarding increased setbacks for off-street parking and loading. 10 foot setback applicable abutting non-residential zones; 25 foot setback applicable abutting residential zones.	Met.
• Buildings > 45 feet in height ○ Front ○ Side	35+ ft. feet		Not Applicable.

○ Rear	10+ or 25+ feet 10+ or 25+ feet	Minimum setbacks increase: Abutting non-residential zones: 1 additional foot for each foot of structural height over 45 feet Abutting residential zones: 1 additional foot for each foot of structural height. See also Subsection 12.25.280.B.1 regarding increased setbacks for off-street parking and loading.	
Maximum Setbacks	None		Not applicable
Minimum Building Height*	None		Not applicable
Maximum Building Height			
• High Profile Industrial Buildings	150 feet or less	45 ft. and 150 ft. heights applicable abutting non-residential zones;	Not applicable
• All other buildings	45 feet or less	Within 100 feet of a residential zone: maximum height 45 feet minus 1 ft. for every 2 ft. less than the 100 ft. setback.	All hangars comply with the 45-foot height limit. For sloped and gabled roofs, the height is measured to the midpoint of the gable, per Figure 12.01.500-B.
Maximum Building Coverage	50%		32.1%. The leasehold is 596,638 sq. ft. Building coverage of enclosed buildings is 189,278 sq. ft. A canopy over a portion of the fuel farm is 2,360 square feet. Including this canopy, the total building coverage is 191,638 sq. ft., or 32.1% of the leasehold.
Minimum Useable Open Space	Not applicable		Not applicable.
Minimum Landscaping	15%	See Section 12.50.220.	16.1%. The leasehold is 596,638 sq. ft. Landscaped area is 96,401 sq. ft.

Figure 12.01.500-B: Different Roof Types and Building Height



12.25.270 Variances and Adjustments.	Applicant Response
Applications for Variances and Adjustments to other base zone standards in the I-P zone may be approved under 1 of 4 processes: A. As a Variance pursuant to Section 12.80.152; B. As a Minor Adjustment in conjunction with a primary Type II or Type III application pursuant to Section 12.80.154; C. As a Major Adjustment in conjunction with a primary Type III application pursuant to Section 12.80.156; or D. With a Significant Natural Resource Permit pursuant to Section 12.80.130.	No Variances or Adjustments are requested.

12.25.280 Other Pertinent Regulations	Applicant Response
B. Site Development Standards. In addition to the standards listed in subsection A above, the following standards apply to all development in the I-P zone: 1. Off-Street Parking and Loading. Off-street parking and loading are not permitted in required front yards, or in required side or rear yards abutting a residential zone, unless building setbacks are increased to 75 feet and a 20 foot landscaped buffer is provided adjacent to the property line.	The site does not abut any residential zones. No off-street parking or loading is located within the 35-foot front yard setback.
2. Site Storage and Maintenance. a. Materials, equipment and waste must be stored and grounds must be maintained in a manner which will not attract insects or vermin or create a health hazard. b. Yards adjacent to streets and those abutting a residential zone shall be landscaped and continuously	The site does not abut any residential zones. The 35-foot front yard setback is continuously landscaped with trees, shrubs and groundcover as shown in the landscape plans. Notably, a series of repeating continuous 4-foot high

12.25.280 Other Pertinent Regulations	Applicant Response
in groundcovers, trees or shrubs as required by Section 12.50.220. All other yards and unused property shall be maintained in grass or other suitable ground cover.	landscaped berms are located in the 35-foot front yard setback running parallel to NE Brookwood Pkwy. The 3 berms closest to the intersection with NW Airport Rd are increased to 5-feet in height for additional landscape emphasis and screening. All other unused area of the site contains grass or other groundcover or landscaping as shown in the landscape plans.
b. Yards adjacent to streets and those abutting a residential zone shall be landscaped and continuously maintained in suitable groundcovers, trees or shrubs as required by Section 12.50.220. All other yards and unused property shall be maintained in grass or other suitable ground cover.	The 35-foot front yard setback is continuously landscaped with trees, shrubs and groundcover as shown in the landscape plans. Notably, a series of repeating continuous 4-foot high landscaped berms are located in the 35-foot front yard setback running parallel to NE Brookwood Pkwy. The 3 berms closest to the intersection with NW Airport Rd are increased to 5 feet in height for additional landscape emphasis and screening. All other undeveloped areas of the site contain grass or other groundcover or landscaping as shown in the landscape plans.

12.50.200 Site Design

12.50.220 Landscaping	Applicant Response
D. Area and Maintenance Standards. 1. Type II and III development applications submitted after September 4, 2014 shall provide landscaping which meets or exceeds the area percentages specified in the applicable base zone standards, unless a Variance or Adjustment has been granted by the Review Authority pursuant to Section 12.80.150.	The proposal is for a Type III Development Review. Per Table 12.25.260-1, the minimum required landscaping is 15%. The total area of the leasehold is 596,638 square feet. Landscaped area is 96,401 square feet, or 16.1%.

12.50.220 Landscaping	Applicant Response
3. On development sites in zones having a minimum landscaping percentage standard, required landscaping areas shall be located preferentially as follows: first, within front yard setbacks adjacent to streets; and second, within side or rear yard setbacks between residential and non-residential uses.	The minimum percentage of landscaping is 15% per Table 12.25.260-1. The leasehold area of 13.70 acres will meet this percentage as proposed. The site does not abut any residential zones or residential uses. The site abuts one street, NE Brookwood Pkwy. The entire 35-foot front yard setback adjacent to NE Brookwood Pkwy is landscaped as shown in the landscape plans.

12.50.240. Exterior Lighting.	Applicant Response
B. Applicability. Except as provided in subsection E below, the standards of this section shall apply to all Type II and Type III development applications in which exterior lighting is proposed or required as a condition of approval, unless a Variance or Adjustment has been granted by the Review Authority pursuant to Section 12.80.140 Variances and Adjustments.	The proposal is for a Type III Development Review. These standards apply. Lighting details were submitted with the original application in Exhibit K.
C. Standards. 1. Development applications shall include a lighting plan showing locations and specifications for all lighting used to illuminate public and private streets, buildings, sidewalks, multi-use paths, parking lots, plazas, or open space areas. The lighting plan shall be evaluated during the land use approval process for compliance with the standards of this section.	Lighting is provided along the length of the buildings adjacent to pedestrian walkways, along the interior driveways and parking areas, and abutting the two walkways connecting to Brookwood. The proposed lighting creates a continuous, well-lit pedestrian route from the sidewalk to the building.
2. For safety purposes, lighting shall be provided throughout the on-site pedestrian circulation system, including street frontages, sidewalks, multi-use paths, parking lots, buildings, and plazas. The on-site pedestrian circulation system shall be lighted to a minimum level of 2 foot-candles to enhance pedestrian safety and allow use at night.	Lighting is provided along the length of the buildings adjacent to pedestrian walkways, the interior driveways and parking areas, and the 3 walkways connecting to NE Brookwood Parkway, creating a well-lit pedestrian path from the sidewalk to the building. Additionally, bollards with integrated lights are placed along the path along NE Brookwood Parkway to further enhance pedestrian safety.
3. Required bicycle parking shall be lighted to a minimum 3 foot-candles to allow secure use at night.	Bicycle parking is not required for aircraft hangars. This does not apply.

12.50.240. Exterior Lighting.	Applicant Response
4. The minimum lighting level for building entries of new multi-dwelling, retail, commercial, office, industrial and institutional buildings located within 300 feet of the property boundaries of a major transit stop shall be 4 foot-candles. The minimum lighting level for all other primary building entrances shall be 3 foot-candles. Lights shall be 6 to 12 feet in height and the light source shall be shielded to reduce glare consistent with subsection D below.	The site is within 300 feet of a Major Transit Stop. The transit stops at the intersection of NE Brookwood Parkway and NW Airport Road are Transit Stops on a Major Transit Route. Tenant entry doors will be lit to a level of 6–9 foot-candles. In addition, decorative lighting will be installed 7 feet above grade on both sides of each entry door. All lighting at building entrances will be shielded to reduce glare.
5. Maximum lighting levels for pedestrian circulation systems, required bicycle parking, and building entrances shall be 4 foot-candles.	Bicycle parking is not required for aircraft hangars. This does not apply.
6. Lighting plans shall also show any proposed exterior architectural or aesthetic lighting used to create visual interest or emphasize building features. Aesthetic and architectural lighting shall also be evaluated during the land use approval process for compliance with the standards of this section.	Exterior wall packs are positioned around the buildings to wash soft light down the façade. The corrugated exterior enhances this effect, creating natural shadows and highlights that add depth and visual interest to the building.
7. Foreground spaces, such as building entrances and plaza seating areas, shall use pedestrian-scale lighting that defines the space without glare. Background spaces such as parking lots shall be illuminated as unobtrusively as practicable to meet the functional needs of safe circulation and of protecting people and property.	Exterior parking areas and pedestrian pathways will be illuminated using a combination of site-mounted light poles and building-mounted wall packs. These fixtures are shielded to provide unobtrusive lighting while meeting functional needs.
8. No site lighting is proposed that could be confused with warning, emergency, or traffic signals.	No site lighting is proposed that could be confused with warning, emergency, or traffic signals.
9. No site lighting is proposed that could be confused with warning, emergency, or traffic signals.	No site lighting is proposed that could be confused with airport lighting.
D. Light Trespass Standards. 1. Light Trespass. Maximum lighting levels at property lines generally shall not increase lighting level more than 1.75 footcandles 10 feet beyond the property line, as illustrated in Figure 12.50.240-A:	Lighting will not increase lighting levels more than allowed.

12.50.240. Exterior Lighting.	Applicant Response
2. Shielding. Any light source or lamp that emits more than 900 lumens (13 watt compact fluorescent or 60 watt incandescent) shall be concealed or shielded with an Illumination Engineering Society of North America (IESNA) full cut-off style fixture with an angle not exceeding 90 degrees to minimize the potential for glare and unnecessary diffusion on adjacent property. Examples of shielded light fixtures are shown in Figure 12.50.240-B:	All exterior light fixtures will be shielded or downlit.
E. Exemptions. The following types of lighting are not subject to the requirements of this section: 1. Public street and right-of-way lighting (standards for street lighting are addressed in the Public Works Design and Construction Standards); 2. Temporary decorative seasonal lighting; 3. Temporary lighting for emergency or nighttime work and construction; 4. Temporary lighting for theatrical, television and performance areas, or for special public events; 5. Lighting for a special district, street or building that, according to an adopted City plan or ordinance, is determined to require special lighting aesthetics as part of its physical character; 6. Lighting required and regulated by the FAA; and 7. Lighting for outdoor recreational uses such as stadiums, driving ranges, ball diamonds, playing fields, tennis courts and similar uses, provided that: (a) light poles are not more than 80 feet tall, (b) maximum illumination at the property line is not brighter than two foot-candles, and exterior lighting is extinguished no later than 11:00 p.m.	No lighting in this proposal is required or regulated by the FAA. FAA Taxi lighting occurs off-site. All lighting will be standard building and site lighting. If any public street lighting is required, it will be regulated by the Public Works permitting process separate from this review. No other exemptions apply.

12.50.250 Fences, Free-Standing Walls, Hedges and Berms	Applicant Response
B. Standards for Berms. As an alternative or in addition to perimeter fences or walls, projects may include perimeter earthen berms. Berms in residential developments shall be a maximum six feet in height, with a maximum 25% slope. Berms in commercial, industrial or institutional developments may exceed this height and/or slope if approved through the Development Review process. If approved, berms shall include stabilizing landscaping on all sloped	All proposed berms are to be a maximum of 25% slope. Most berms along the NE Brookwood Parkway frontage will be 4-feet in height. The 3 berms closest to the intersection of NW Airport Rd will be 5 feet in height. All berms are within the maximum slope allowed. See grading and landscape plans.

12.50.250 Fences, Free-Standing Walls, Hedges and Berms	Applicant Response
areas; irrigation; and provision for drainage at the toe of all slopes.	

12.50.270 Waste and Recycling Facilities	Applicant Response
3. <u>Storage Area Size</u>. Buildings shall provide the minimum storage areas shown in Table 12.50.270-1 below. If a building has more than one of the uses listed, the storage area requirement for the entire building shall be the sum of the requirements for the areas of each use. For purposes of this calculation, the floor area of the storage facility itself shall not be included in the gross floor area (GFA).	The proposed use is Aviation Use (12.10.510) which is in the Infrastructure and Utilities Category (12.10.500). Per Table 12.50.270-1, 50 sf of storage area plus 4 square feet for every 1,000 square feet of gross floor area is required. A temporary storage area will be constructed in Phase I. This will be replaced with a final storage area constructed during Phase II that will accommodate both phases. The following storage areas are required and provided. <u>Phase I Storage Area</u> 110,500 sq. ft. floor area Required temp. storage area: 492 sq. ft. Proposed temp. storage area: 510 sq. ft. <u>Phase I and II Combined Storage Area</u> 186,820 sq. ft. floor area Required storage area: 797 sq. ft. Provided storage area: 850 sq. ft.
D. Location, Design and Access Standards for Storage Areas. 1. Location Standards. - Exterior storage areas shall be located in central and visible locations on the site to enhance security for users. - Storage areas shall not obstruct on-site or off-site pedestrian or vehicle traffic movement. - Storage areas shall be accessible to waste collection vehicles, on accessways compliant with paragraph 3 below, without requiring backing movements onto a public or private street or alley.	Two trash enclosures are proposed, one located nearer the entry to NW Airport Road along the northwestern access drive near hangar 1, and a temporary Phase 1 storage area farther along the same access road near future hangar 2a. Upon construction of Phase 2, the temporary storage area for Phase 1 will be removed and consolidated with the Phase 2 storage area located further north, closer to the access drive into the site.

12.50.270 Waste and Recycling Facilities	Applicant Response
	The location of the storage areas is necessary for several reasons: to meet location requirements that restrict the storage area placement in front of the buildings facing the street (NE Brookwood Parkway); to keep them outside of areas restricted by security fencing; and to maintain visibility to users of the site. As discussed in the site activity statement, employees will have access to golf carts to transport waste to the storage areas more easily and quickly. Storage areas are not adjacent to pedestrian accessways and have enough clearance to not obstruct on-site vehicle access. They are not adjacent to vehicle access points off-site.

Table 12.50.270-1: Waste and Recycling Storage Area Size Requirements	
Type of Use	Minimum Storage Area
Residential: Shared facilities	100 sq. ft. plus 5 sq. ft. per unit for each unit above 10 (can be provided in multiple locations)
Commercial:	
• Retail Products and Services	50 sq. ft. plus 5 sq. ft./1000 sq. ft. GFA
• Food Services Operations	100 sq. ft. plus 10 sq. ft./1000 sq. ft. GFA
• All other uses	50 sq. ft. plus 5 sq. ft./1000 sq. ft. GFA
Industrial	50 sq. ft. plus 6 sq. ft./1000 sq. ft. GFA
Institutional	50 sq. ft. plus 4 sq. ft./1000 sq. ft. GFA
All other uses	50 sq. ft. plus 4 sq. ft./1000 sq. ft. GFA

12.50.300 Vehicle Parking

12.50.320 Number of Spaces	Applicant Response
D. Maximum parking requirements are calculated based on the location of a site in Zone A or Zone B shown on Figure 12.50.320-A. If any portion of a lot or parcel is within Zone A, the entire site shall be construed to be within Zone A.	The leasehold site and subject site of this review is located within Zone B as shown on Figure 12.50.320-A. However, because the entire airport lot has some portion in Zone A, the entire site is

12.50.320 Number of Spaces	Applicant Response
	construed to be in Zone A. The parking maximum is 2 spaces per plane. In total, the hangars can accommodate 30 aircraft. This allows for 60 parking spaces. A total of 60 parking spaces are proposed.
E. For land uses located in Zone A with more than 65,000 square feet of floor area, surface parking may not consist of more area than the floor area of the building. 1. Non-surface parking such as tuck-under parking, parking underground, and subsurface parking, and parking structures are exempted from this calculation. 2. Surface parking shall be measured inclusive of all surface area on which a vehicle is designed to maneuver including all parking stalls, driveways and drive-through lanes within the property regardless of length, and all maneuvering areas regardless of depth. 3. Paved areas not for use by passenger vehicles, such as loading areas or outdoor storage of goods or materials, are not counted as surface parking area.	The proposal is for approximately 186,000 square feet of floor area . The proposed surface parking area including aisles behind parking spaces, but not including access driveways to the parking areas is 46,150 square feet. This is less than the proposed floor area. All parking is surface parking.

12.50.360 Vehicle Parking and Loading: Design and Improvements.	Applicant Response
B. Off-Street Vehicle Surface Parking Design in General. 1. Driveway Locations and Access Aisles. Sight distance/vision clearance areas shall be provided in compliance with Section 12.50.260 at the intersections cited in that section. At all other driveways, sight distance/vision clearance areas shall be provided in compliance with Figure 12.50.360-A.	Section 12.50.260 Sight Distance/Vision /Clearance is addressed further above in this narrative. This applies to the intersection of NW Airport Road and the access driveway into the development site/lease area. A sight distance/vision clearance triangle is shown on Sheet C102 of the civil plans There are no plantings or structures proposed within the sight distance/vision clearance area. Additionally, an Intersection Evaluation was conducted for the sight distance at the intersection of NE Brookwood Parkway and the library entrance/NW Airport Rd. This study recommends that the existing bus stop shelter be replaced with a shelter that has clear walls down to the ground. The applicant intends to

12.50.360 Vehicle Parking and Loading: Design and Improvements.	Applicant Response
	comply with any City requirements that relate to the bus shelter. See Intersection Study submitted with these revisions.
2. Except as provided in paragraphs 3 through 5 below, minimum dimensions and configurations for parking spaces, access aisles and maneuvering areas are shown in Figure 12.50.360-B.	All of the proposed parking spaces have a parking angle of 90 degrees. The proposed plan shows that all of the spaces meet the minimum of 9 feet wide and are 19 feet deep with a 26 foot wide drive aisle. Some spaces are greater than 9 feet wide to adjust for landscape island placement doorways and other considerations. The drive aisle exceeds the minimum 24 foot width in order to meet the Tualatin Fire and Rescue's 26 foot wide requirements for access.
2. General Parking Lot Landscaping Standards. a. Coverage. A minimum of 70% of all required parking lot landscaped areas, including required planting strips and planting bays, shall be planted with trees or shrubs and continuous ground cover consisting of lawn, low growing evergreen shrubs, or evergreen ground cover. The percentage measurement in this standard shall be calculated at plant maturity. b. Plant Sizes. The minimum planting size for all required trees, shrubs and ground covers in parking lot landscaping shall comply with the standards in Table 12.50.220-1.	There is 7,626 square feet of total interior and perimeter parking lot landscaping area; 7,038 square feet, or 92 percent, of that will be landscaped per the standards. Plant sizes and spacing will meet the requirements of Table 12.50.220-1. See landscape planting plan sheets L201-203.
3. Perimeter Landscape/Screening. a. Perimeter landscaping or screening shall be provided to meet 1 or more of the following standards: i. Planter strips at the width specified in Table 12.50.360-1, planted with large-scale, high canopy, horizontally-branching street tree species. Adjacent to public rights-of-way, tree species in perimeter planter strips shall be selected and planted to be compatible with trees and above- and below-ground utilities in the planter strips or in the public right-of-way. Individual trees shall be spaced between parking spaces to reduce damage from automobiles; and/or	These standards apply where parking lots are adjacent to public rights-of-way, in this case NE Brookwood Parkway. They do not apply to lease boundaries or to the property line closest to NW Airport Road. Thus, perimeter landscape/screening applies to the parking are located in front of Hangar 4 and abutting the NE Brookwood Parkway frontage. Table 12.50.360-1 requires a 6-foot screening width adjacent to Arterial

12.50.360 Vehicle Parking and Loading: Design and Improvements.	Applicant Response
ii. Planter strips at the width specified in Table 12.50.360-1, planted with an evergreen hedge. Hedges adjacent to public rights-of-way shall be between 30 inches and 42 inches in height; and/or iii. A decorative wall or fence 30 to 42 inches in height parallel to and at least 2 feet from the right-of-way line, with landscaping between the wall or fence and the sidewalk consistent with paragraph 2 above.	streets. More than 6-feet is provided in all applicable locations. Perimeter landscaping is met using the high canopy tree option in 3.a.i See landscape planting plan sheets L201-L203.
4. Interior Landscaping. a. Surface parking areas shall include interior landscaping meeting the following standards: i. Planting Islands. At least one 2 1/2" caliper street tree shall be planted in protected islands at the end of each parking row, and at intervals 100 feet or less within the parking rows. Planting islands shall be at least 5 feet wide, with a minimum area of 190 sq. ft. in a double loaded parking row or 95 sq. ft. in a single loaded parking row. The remaining area of each island shall be landscaped consistently with the general standards in paragraph 2 above. ii. All Other Areas. Interior landscaping consistent with the general standards in paragraph 2 above shall be installed wherever parking spaces, access aisles, driveways, or pedestrian movements would not be impeded by landscaping.	Trees are planted at ends of each parking rows at intervals of less than 100 feet. All parking rows are single loaded and meet the minimum planting island area. All islands are at least 5-feet wide. See Landscape Plans planting plan, Sheets L201-203.
b. Maximum Landscaping Percentage Allowed. If compliance with the standard of this section would require that the area of interior parking lot landscaping exceed 10% of the total area of the surface parking lot, the area of required landscaping shall be limited to 10% unless necessary to meet canopy coverage requirements or otherwise requested by the applicant.	The area of interior parking lot landscaping proposed exceeds 10% of the total area of the surface parking lot. However, these landscaped areas are necessary to meet the 30% tree canopy coverage standard of 12.50.360.F.5.a.i described below.
5. Additional Parking Lot Design Requirements a. Parking lots greater than one-half acre of new off-street surface parking, as measured based on the perimeter of all new off-street parking spaces, maneuvering lanes, and maneuvering areas, including driveways and drive aisles shall provide	The parking lots and drive aisle behind parking spaces is 46,150 square feet. Of this, tree canopy within 15 years covers 14,542 square feet, or 31%. See the canopy plan, sheet L301.

12.50.360 Vehicle Parking and Loading: Design and Improvements.	Applicant Response
the following: i. Tree Canopy. Developments shall provide either trees along driveways or a minimum of 30 percent tree canopy coverage over new parking areas at tree maturity but no more than 15 years after planting. (Developments are not required to provide trees along drive aisles); and one of the following;	
ii. Climate Action Elements. 1. Tree canopy covering at least 40 percent of the new parking lot area at maturity but no more than 15 years after planting; or 2. Installation of solar panels with a generation capacity of at least one-half kilowatt per new off-street parking space. Panels may be located anywhere on the property; or 3. Payment of at least \$1,500 per new off-street parking space into a city or county fund dedicated to equitable solar or wind energy development or a fund at the Oregon Department of Energy designated for such purpose; or 4. A mixture of these actions the city deems to meet the purpose of this requirement.	The applicant elects to use option ii.2, installation of solar panels. Panels will be installed on the roof of the Ground Support Equipment (GSE) building adjacent to hangar 4 Local solar contractors have been contacted, and the roof area exceeds what is required to provide the required kilowatts per parking space. This will be verified at time of building permit.
iii. The tree spacing and species planted must be designed to maintain a continuous canopy except when interrupted by driveways, drive aisles, and other site design considerations.	This standard is partially met, and partially not met due to interruptions by driveways, drive aisles, and other site design considerations as allowed by this provision. The landscape plan was developed to comply with both the City of Hillsboro standards and the standards of the Port of Portland's Hillsboro Airport Wildlife Hazard Management Plan (WHMP), which implements FAA requirements. The WHMP discourages continuous canopy because it provides nesting and foraging habitat for birds. The Port's rules regarding bird habitat are to conform with FAA regulations to preserve safety and limit bird strikes. To this end the WHMP

12.50.360 Vehicle Parking and Loading: Design and Improvements.	Applicant Response
	contains spacing specifications based on tree species. See page 69 of the Plan (Attachment B.4), item 3 under New Landscaping. The proposed landscape plan for the subject site was developed to comply with both the City of Hillsboro standards and the standards of the WHMP . However, after review of the proposed landscape plan some continuous canopy will be proposed as shown on the canopy plan on Sheet L301 These locations are primarily at the eastern edge of the parking area adjacent to Hangar 4, in the location of the perimeter parking area landscaping. Other site design considerations include: • Interruptions in parking rows and landscaped islands due to the location of pedestrian entrances or “nose notch” overhead doors necessary for aircraft parking. • Location of solid waste and recycling storage; and • 26-foot wide drive aisles to accommodate fire truck access.

Table 12.50.360-1: Parking Area Perimeter Planter Strip Minimum Widths	
Location	Minimum Width
Along an arterial street right-of-way	6 feet
Along any other street right-of-way	5 feet
At any other perimeter location	4 feet

12.50.400 Bicycle Parking/Bicycle and Pedestrian Circulation and Connectivity

12.50.420 Pedestrian and Bicycle Circulation	Applicant Response
D. Standards – On-Site Facilities.	No bicycle parking is required.

12.50.420 Pedestrian and Bicycle Circulation	Applicant Response
1. Connections Required. New development shall provide on-site pedestrian and bicycle circulation systems as follows: a. Connecting the new development to abutting residential uses, neighborhood activity centers, usable open space, parking lots, and transit stops; b. Connecting the main building entrance of each building to the nearest public sidewalk or walkway leading to a public sidewalk; and c. Stubbing accessways to abutting vacant land or to developed land without pedestrian/bicycle connections.	There are no abutting residential uses, activity centers, or open space. A pedestrian circulation system is adjacent and parallel to the hangars adjacent to the parking areas. There are multiple building entrances on the site. There is a pedestrian connection from the entries of hangar 4, hangar 5 and hangar 1 with direct connections to the public sidewalk on NE Brookwood Parkway. The remaining entries connect to the street by the circulation system adjacent and parallel to the buildings. Abutting vacant land to the northwest is the airport airfield. Abutting vacant land to the northeast is NW Airport Rd, which is a driveway and will not be developed with buildings so no accessway stubs are proposed.
2. Direct Routing. Pedestrian and bicycle accessways shall be reasonably direct.	No bicycle parking is required. There is a pedestrian connection from entries to hangar 4, hangar 5, and hangar 1 with connections to the public sidewalk on NE Brookwood Parkway. These accessways are as direct as possible to the street. The remaining entries connect to the street by the circulation system adjacent and parallel to the buildings.
5. Improvements. On-site accessways shall be improved to the following standards: a. Accessways shall be hard surfaced, which includes pervious surfacing techniques, well-drained, and at least 5 feet in unobstructed width, except as provided in paragraph b, below. b. Accessway width shall be increased to 7 feet if the walkway abuts perpendicular or angled parking spaces unless the spaces are equipped with wheel stops pursuant to Subsection 12.50.360.C.3. c. Accessway surface material shall contrast visually with adjoining surfaces. d. Where accessways are parallel to and abut a vehicular access aisle, the accessway shall be raised or separated from the access aisle by a raised curb, bollards, landscaping or other	Accessways from the entries at hangars 1 and 4, and 5 are variable width between 5 and 6 feet wide. These are unobstructed widths. Accessways adjacent and parallel to parking areas are 6 feet wide. The parking spaces that terminate perpendicular to these accessways are equipped with 4-inch wheel stops. The accessways are proposed to be concrete which will contrast visually with the proposed asphalt parking lot.

12.50.420 Pedestrian and Bicycle Circulation	Applicant Response
physical barriers. Where raised accessways are used, the ends shall be equipped with curb ramps.	Accessways that are parallel to, and abutting, parking spaces are separated by a curb. No access ways are parallel to and abutting driveway aisles.
6. On-site pedestrian and bicycle circulation shall minimize pedestrian/vehicle conflicts through any or all of the following measures or their equivalents: a. Separating pedestrian accessways through the site and parking areas; b. Minimizing accessway crossings of driveways; or c. Marking pedestrian crossings with changes in elevation, paving texture, color, or material. Crossing markings shall contrast and clearly delineate the crossing or walkway at any time of day or night and shall be improved consistent with ADA and the Oregon Structural Specialty Code.	Pedestrian accessways that are parallel to and abutting parking spaces are separated from the parking area by curb and wheel stops as described above. There are 3 points where accessways cross the vehicle circulation driveway leading to the parking area in front of hangar 4. These crossings will be concrete, contrasting with the asphalt driveway. The proposed crossings are also perpendicular crossings which are more easily identifiable than diagonal crossings.

12.50.430 Connectivity and Design Standards at or Near Transit Stops	Applicant Response
E.2. Building entrances at or near a major transit stop or facing on a plaza shall have weather protection features to protect pedestrians, including, but not limited to, arcades, roofs, porches, alcoves, porticos and/or awnings. The use of continuous, on-site weather protection features or structures between building entrances and adjacent transit streets, streets intersecting transit streets, or transit stops is encouraged.	Horizontal canopies are provided at all building entrances and including extension over adjacent banks of windows for weather protection at individual entrances. See revised building elevations submitted with these revisions. However, note that this standard relates to “building entrances” at or near transit stops. None of the proposed new building entrances are at or near the major transit stop as they are all more than 200 feet from the transit stop.
E.5. All development shall provide a pedestrian connection between the transit stop and the main building entrance(s) on the site that is continuous, unobstructed, reasonably-direct route between the 2 points that is intended and suitable for pedestrian use. On developed parcels, pedestrian connections shall be hard-surfaced. In parks and natural areas,	Three onsite pedestrian connections are proposed from the hangars to the public sidewalk in NE Brookwood Parkway. One connection to Hangar 1 serves the “rear” hangars 1, 2a, 2b, 3a and 3b. One connection serves hangar 4 and another separate connection serves hangar 5. The public sidewalk is then utilized as the

12.50.430 Connectivity and Design Standards at or Near Transit Stops	Applicant Response
pedestrian connections may be soft-surfaced pathways.	remainder of the pedestrian route to the transit stop. The connections on private property are concrete, unobstructed and as direct as possible to the public sidewalk. Due to the size and trapezoidal lease boundary of the development site, the closest building entrance to hangar 1, as traveled by a pedestrian, is approximately 600 feet from the transit stop. The closest building entrance to Hangar 5 is approximately 750 feet from the transit stop, as traveled by a pedestrian, and the entrance to Hangar 4 is further. The 3 pedestrian accessways provide the most direct connection from the buildings to NE Brookwood Parkway, as required elsewhere in this code.

12.50.600 Public Utilities, Site Grading and Storm Water Management Facilities Site Integration

12.50.640 Storm Water Facilities Site Integration.	Applicant Response
D. Standards. - Plans for aboveground stormwater facilities shall be submitted with landscaping plans for land use applications under Subchapter 12.80 Applications. Site improvements in the vicinity of the stormwater facility shall designed and installed to integrate the facility into the site design through coordination of finished grade elevations and use of compatible landscaping species consistent with Section 12.50.220. - The Review Authority may condition any Type II or Type III land use application approval to require that the aboveground stormwater facility complies with the applicable provisions of the 2018 CWS Design and Construction Standards Chapter 3 Sensitive Areas and Vegetated Corridors and Chapter 4 Runoff Treatment and Control.	All stormwater management facilities are proposed to be underground facilities. There are no above ground facilities proposed. There are no identified Sensitive Areas nor vegetated corridors. The above ground facility will comply with CWS requirements of Chapter 4.

12.50.800 Design Standards for Non-Residential and Mixed-Use Development

12.50.820 Main Entries	Applicant Response
B. Entry Orientation. All ground-floor tenant spaces with at least 25 feet of frontage facing a public or private street shall have at least 1 building entry oriented to the street. This entry shall open directly to the building exterior, at the ground floor level, but may be elevated above finished grade if a stoop, porch, portico or similar architectural feature is included in the design. 12.01.500 Definitions Main Building Entrance. <i>A primary pedestrian entrance to a building.</i>	The public street frontage is NE Brookwood Parkway. Hangar 4 and Hangar 5 have frontage facing NE Brookwood Parkway. Each of these hangars have an entry oriented to NE Brookwood Parkway, opening to the ground level.
E. Sidewalk Connections to Entries. Unless exempt under subsection H below, a pedestrian sidewalk or pathway shall be provided directly to the building entrance from all street sidewalks.	The street sidewalk is located adjacent to NE Brookwood Parkway. A pedestrian connection is provided directly to a building entrance for both rows of hangars (hangars 4 & 5; and hangars 1, 2a and b, and 3a and b) to the public sidewalk on NE Brookwood Parkway. The pedestrian connections then connect to pedestrian accessways that run parallel to the hangars for continued access to the building entrances from the public sidewalk. The pedestrian connections to the street are not consolidated; they are distributed along the length of the NE Brookwood Parkway frontage to achieve the most direct route to each Hangars 4 and 5, and to the “rear” Hangars 1, 2, and 3.
5. Main entries shall be highlighted with at least 3 of the following architectural features: recessed doorway(s); overhangs or canopies; transom windows; at least 2 ornamental light fixtures flanking the entry; larger, transparent or more prominent doors; or pilasters or columns that frame the doorway.	All pedestrian entrances to the buildings include horizontal canopies, transparent doors, and 2 ornamental light fixtures flanking each side of the entries.
G. Additional Entries. Buildings may have more street-oriented main entries than required by this section,	Hangars 4 and 5 face NE Brookwood Parkway. Each hangar has a main entry,

12.50.820 Main Entries	Applicant Response
and may have secondary entrances oriented to off-street parking and loading areas.	and hangar 4 has multiple additional pedestrian entries.

12.50.850 Improvements and Activities between Streets and Buildings	Applicant Response
C. Standards. 1. The front yard between the public sidewalk or right-of-way and any adjacent building shall be improved with irrigated landscaping or hardscaping. Where provided, landscaping shall comply with the applicable requirements of Section 12.50.220.	The 35-foot front yard setback is landscaped or hardscaped with pedestrian connections and the plaza. Landscaping will comply with Section 12.50.220, and will be irrigated. Irrigation plans will be submitted with the building permit.
2. Where hardscaping is used in lieu of landscaping in front yards, the hardscaped areas shall contain at least 2 pedestrian-friendly amenities integrated into the overall site design. Examples of such amenities include but are not limited to the following: a. Weather canopies or sunshades; b. Benches or low walls with seating areas; c. Drinking fountains and/or water features; d. Free-standing planters and/or raised planting beds; e. Street furniture; f. Public art or sculpture; or g. Other design features requested by the applicant if approved by the Review Authority.	A publicly accessible, circular plaza and respite area is proposed adjacent to the right of way on NE Brookwood Parkway and the northernmost pedestrian connection to the site. The plaza consists of a 20 feet wide hardscaped area, with seating areas that extend the diameter. The plaza will be at least partially shaded by trees at maturity. The plaza is accessible from NE Brookwood Parkway, a Major Trail and will provide seating and is surrounded by raised berms on the north and south sides.
3. Paragraph 2 above does not apply to paved pedestrian connections between the sidewalk and building entrances.	There are 3 paved pedestrian connections between the sidewalk on NE Brookwood Parkway and the building entrances.

12.50.890 Utilitarian Functions	Applicant Response
C. Standards. 1. To reduce their visual and audible impacts, roof-mounted equipment, vent and chimneys shall be placed behind parapets, architecturally compatible screens, roof-top landscaping or other equivalent measures requested by the applicant if approved by the Review Authority.	There is no roof-mounted equipment, chimneys or vents. Solar panels are proposed on the roof of the Ground Support Equipment (GSE) building adjacent to hangar 4. This roof is sloped toward the north, not toward the street frontage. The GSE building is shorter than the hangars, located behind the front building line of hangar 4 and the line of

12.50.890 Utilitarian Functions	Applicant Response
	security fencing, and minimally visible from the street.
3. Wall- or ground-mounted mechanical, electrical and communications equipment shall be screened from streets and adjacent properties. Such screens shall be architecturally compatible with the building and landscaping.	No wall mounted equipment facing NE Brookwood Parkway is proposed. Any ground-mounted mechanical equipment adjacent facing NE Brookwood Parkway will be screened with metal screens consistent with the exterior building materials a shown in the screening detail on sheet A106. Additionally, this will be screened by perimeter parking lot landscaping on the opposite side of the parking area in front of Hangar 4, and the continuous repeating 4-foot tall berms along the frontage of NE Brookwood parky. The fuel farm will be screened from NE Brookwood Parkway by the security fence described above under Section 12.50.250. That security fence is separated from NE Brookwood Parkway by the intervening access driveway to the parking area in front of Hangar 4. Furthermore, the access driveway is separated from NE Brookwood Parkway by the landscaped front yard. The front yard setback is at least 35 feet deep along the entire frontage of the leasehold. Landscaped berms as described in Section 12.50.250 are provided in that area for further screening. Finally, the right-of-way between the property line and the street curb is an additional 35 feet in width and contains mature and continuous street trees.

Development Review Approval Criteria

To reiterate, the following reviews are requested. See Overall Site Plan in Attachment C.1 for graphic description of Adjustments.

1. Type III Development Review

2. **Adjustments**-Adjustments are no longer requested.

12.80 Applications

12.80.040.H Development Review. Approval Criteria

H. *Approval Criteria. To approve an application for Development Review, the Review Authority shall make findings of fact based on evidence provided that the following criteria are satisfied:*

1. *The proposal complies with all of the development standards of the base zone, unless a minor adjustment has been approved concurrently with the Development Review application;*

Response: The site is located entirely in the I-P zone. The development standards applicable in the I-P zone have been addressed above under Use and Development Standards.

2. *The proposal complies with any applicable provisions of Subchapter 12.27;*

Response: The site is not within an overlay zone. This does not apply.

3. *The proposal complies with any applicable provisions of Subchapter 12.40;*

Response: There are no applicable sections of 12.40 that apply to this project. Section 12.40.260 is for Utility facilities; this use is classified as an Aviation Use. This does not apply.

4. *The proposal complies with the applicable development standards in Subchapter 12.50;*

Response: Section 12.50 is the Development and Design Standards. These standards have been addressed above under Use and Development Standards.

5. *The proposal complies with any applicable plan district standards in Subchapter 12.60;*

Response: The parent site of the Hillsboro Airport is located within the North Hillsboro Industrial Area Plan District. This leasehold site is not located within the plan district. This does not apply.

6. *The proposal meets all existing conditions of approval for the site or use, as required by prior land use decision(s), as applicable;*

Response: There are no conditions of approval required by prior land use decisions. This does not apply.

7. **Additional Criteria for Non-Residential Applications.** (including the non-residential portion of a mixed-use development):

- a. *The transportation system can safely and adequately accommodate the proposed development,*

Response: The proposed development is consistent with allowed uses in the zone. A revised trip generation memorandum is submitted with these revisions. This demonstrates that a Traffic Impact Analysis is not required pursuant to Section 12.70.220. The functional capacity is retained and no other improvements are required.

- b. *Parking areas and entrance-exit points are designed to facilitate on-site vehicular circulation and pedestrian safety and avoid congestion on public streets,*

Response: Access is from NW Airport Road (a driveway) and then to NE Brookwood Parkway at a signalized intersection. A second existing curb cut and driveway from NE Brookwood Parkway directly onto the development site will be closed to eliminate queuing and turning to and from NE Brookwood Parkway as required by the City in correspondence prior to application. There will be limited pedestrian use of the site as most users will arrive by vehicle. However, to maximize safety, onsite pedestrian walkways will be separated from the parking area surface by a raised curb, or a different paving material (concrete), at the two points where pedestrian accessways cross the access driveway. Due to the large size of the site and the nature of the use, most internal foot-traffic will be substituted by use of golf carts.

- c. *Any special features of the site (such as topography, hazards, vegetation, significant natural and cultural resources, etc.) have been integrated into the site development plan,*

Response: The site is flat and contains no significant vegetation besides natural grasses. No cultural resources or hazards are identified in the Hillsboro Cultural Resources Inventory.

- d. *The design and operating characteristics of the proposed development are reasonably compatible with surrounding development and land uses, and*

Response: The proposed development is an Aviation use for use of aircraft at Hillsboro Airport. The surrounding development includes the Hillsboro Airport to the west and southwest and private aircraft hangars to the immediate south. The general vicinity of the area includes other aviation uses, storage and manufacturing, larger commercial developments, and campus-style offices as well as the Hillsboro Public Library, Brookwood branch. The proposed aircraft use is compatible with the surrounding uses that are predominantly industrial, aviation, and large-scale commercial or community service uses, which are conditional uses. These developments are typically land intensive with large amounts of paving and/or buildings, with landscaping focused on site peripheries and at parking areas, consistent with the proposed development.

- e. *Negative impacts of the development have been sufficiently minimized or mitigated.*

Response: The proposed development is an Aviation use, in an Industrial zone (I-P) on Hillsboro Airport property. Due to the nature of proposed and the surrounding uses, there are few negative impacts from this development; any impacts will be minimized or mitigated. Operations are controlled-access, limiting impacts further than what is typical for other airport uses.

On-site lighting will meet lighting limitations as discussed in the standards above. No light trespass will occur.

Stormwater disposal is proposed to meet all requirements of Clean Water Services (CWS) Design and Construction Standards in Chapter 4 for water quality. Roof and paving stormwater will be cleaned with a filter cartridge system and detained for flow control using underground pipes. After being cleaned and detained, the stormwater will flow to the public stormwater pipe system. This public stormwater pipe system ultimately discharges to nearby Dawson Creek, as any new development eventually discharges into a waterbody or waterway. In addition, to meet source control stormwater requirements for the fuel farm, the fuel farm is covered and drains to the sanitary system and not to the stormwater system.

The trip memorandum demonstrates that the anticipated vehicle trips do cross thresholds that warrant further analysis through a traffic impact analysis as identified in HDCD 12.70.220 A. See revised trip memorandum submitted with these revisions.

Additionally, an Intersection Evaluation was conducted for the sight distance at the intersection of NE Brookwood Parkway and the library entrance/NW Airport Rd. This study recommends that the existing bus stop shelter be replaced with a shelter that has clear walls down to the ground. The applicant intends to comply with any requirements relating to the bus shelter. All study intersections are currently operating acceptably per Washington County standards and are projected to continue operating acceptably through a 2029 site buildout year. No operational mitigation is necessary or recommended at these intersections. The queuing analysis shows all applicable turning movements at study intersections have adequate storage space to accommodate projected 95th percentile queues. Accordingly, no intersection queuing related mitigation is necessary or recommended as part of the proposed development. See intersection study submitted with these revisions.

Visually, building materials will be non-offensive white and gray with clerestory windows and identifiable entrances. Utilitarian uses such as trash enclosures and the fuel farm are located behind or at the side of the buildings as viewed from Brookwood Parkway and are screened by fencing, landscaping, and the width of the parkway right-of-way.

Along NE Brookwood Parkway, the entire 35-foot front yard setback will be landscaped with trees and shrubs on elevated berms to enhance the “parkway” aesthetic of NE Brookwood Parkway. Berms will be 4-feet tall for the majority of the frontage, and the northernmost 3 berms at near the intersection with NW Airport Rd will be 5-feet tall. At the south end of the site, the landscaped setback increases to 90-foot depth from the street property line. The right of way from the paving on NE Brookwood Parking to the property line is variable width, but approximately 35-36 feet along the entire frontage. This right-of-way includes street trees, landscaping, and the public pedestrian path. Moving south the total landscaped depth on private property and within the public right-of-way will range from 70 feet to approximately 125 feet in depth. The proposed onsite berms and landscaping continue along and adjacent to the developed portion of NW Airport Road driveway, so will be similarly screened as viewed while traveling south along NE Brookwood Parkway. The existing curb cut on NE Brookwood Parkway will be closed and filled in with street trees, improving the streetscape.

Utilitarian uses such as trash enclosures and the fuel farm are located behind or at the side of the buildings as viewed from Brookwood Parkway and are screened by fencing, landscaping, and the width of the parkway right of way.

Noise is not addressed in the HCDC and is not subject to this review. Hillsboro Municipal Code Section 6.24.regulates noise and there are specific standards of noise that are allowed in each zone, including the I-P. However, aircraft noise is specifically excluded by Section 6.24.050, subsection D. because aircraft noise is regulated by federal law. Similarly, air quality is not regulated by the HCDC and is not subject to this review.

12.80.156.C Major Adjustments Approval Criteria

Response: Adjustments are no longer requested. These criteria no longer must be addressed.

12.80.158 Standard-Specific Approval Criteria for Variances and Adjustments

Response: Adjustments are no longer requested. These criteria no longer must be addressed.

12.50.900 Public Benefit Standards

12.50.910 Purpose and Applicability.	Applicant Response
A. Purpose. In some cases, proposed development may not be able to achieve the standards or requirements of this Code, due to the nature of the proposed use, site constraints, or other concerns. To offset or mitigate requested adjustments from the standards, applicants shall include development amenities, that provide benefit within or beyond the boundaries of the development site. This section is intended to provide measurable standards for such public benefits, which are consistent with the goals and policies of the Comprehensive Plan. However, a Public Benefit does not have to directly relate to the standard being adjusted. B. Applicability. These standards may be applied by the Review Authority in any discretionary land use application process in which an applicant has requested an adjustment or variance from the standards of this Code, unless such standard specifically allows an adjustment without discretionary review.	Adjustments are no longer requested. Due to the elimination of the Adjustment requests, the 15.50.900s series of chapters no longer apply. Therefore, the following sections no longer apply: • 12.50.920 Enhanced Building and Site Design Elements. • 12.50.930 Sustainable Development Practices • 12.50.940 Crime Prevention through Environmental Design

12.50.910 Purpose and Applicability.	Applicant Response
C. Exceptions. The following shall not be considered a public benefit: 1. Meeting base code standards. 2. Providing a use that is permitted, permitted with limitations or conditionally permitted in the zone. 3. Complying with requirements from other agencies or entities that have jurisdictional authority.	

Conclusion

The proposal is to develop this 13.70 acre leasehold portion of the Hillsboro Airport with six new aircraft hangars to be used for approximately 30 aircraft. The hangars will be constructed in 2 phases as described at the beginning of this narrative under Proposal. The project is an allowed Aviation use, permitted by right in the I-P zone. As demonstrated through this narrative and attachments, all use and development standards for this use and zone are either met, or can be met with conditions of approval. The Development Review should be approved.