



Mendocino County

NOV 19 2020

Planning & Building Services

November 19, 2020

Mendocino County Airport Land Use Commission
Chairperson Eric Crane
County of Mendocino
860 N Bush St
Ukiah, CA 95482
VIA EMAIL: pbs@mendocinocounty.org

Re: Direction on the Draft Ukiah Municipal Airport Land Use Compatibility Plan for possible modification to accommodate fire-fighting aircraft – comments from the City of Ukiah

Honorable Members of the Airport Land Use Commission:

The City of Ukiah has conducted a review of the November 19, 2020 Memorandum from Mendocino County Planning and Building Services (PBS) staff and respectfully submits the following comments for consideration regarding the aforementioned project, the Draft Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP).

1. The three Options presented by PBS staff are incomplete and do not accurately represent the options recommended by the UKIALUCP consultant, Mead & Hunt.

In recent months, and due to the increasing threat of wildfires in the region as evidenced by the two mega-fires in Mendocino County in 2017 and 2020, the two largest in State history, City staff have been working with the Ukiah Airport Commission and Mead & Hunt on a possible special exception area within the 2020 UKIALUCP to protect the area for a possible runway extension to 5,000 feet. Three options were presented by Mead & Hunt in an October 20, 2020 Technical Memorandum (Attachment 1) and shared and discussed with PBS staff on at least two occasions.

As you will note from a review of the 10/20/20 Mead & Hunt Memo in Attachment 1, Options 1-3 in the November 19, 2020 PBS Memo neither include nor incorporate any of the Mead & Hunt recommended Options.

2. Additionally, none of the Options presented by PBS staff accurately represent the Ukiah City Council's November 18, 2020 recommendation to the Commission.

At its November 18, 2020 meeting, the Ukiah City Council unanimously approved the following:

Motion/Second: Scalmanini/Orozco to approve Option #2 in the October 20, 2020, Mead & Hunt Technical Memorandum within Attachment 1 to protect for a future 5,000-foot runway for CalFire and other operations; and direct staff to communicate Council's direction to the Mendocino County Airport Land Use Commission..."



Specific details of the Council's recommendation to the Commission are as follows:

A. Create a 1* compatibility zone on the northern and southern ends of Zone 1, the Runway Protection Zone, as depicted in the maps below and denoted by areas within the dashed gray lines.

The proposed 1* Zone protects for a possible 5,000-foot runway by restricting future density and development through compatibility criteria (see 2B below).

Section 21674(b) and (c), respectively, of Public Utilities Code describes two of the Powers and Duties of the Airport Land Use Commission as: "To coordinate planning at the state, regional, and local levels so as to provide for the orderly development of air transportation, while at the same time protecting the public health, safety, and welfare"; and "To prepare and adopt an airport land use compatibility plan pursuant to Section 21675." Although County PBS staff note in their Memo an Option 2 for the City to adopt an overlay, this is not in keeping with the intention of the State legislature in its creation of Airport Land Use Commissions. Compatibility policy adopted by the Mendocino County Airport Land Use Commission will inform City and County policymakers, namely the Ukiah City Council and Mendocino County Board of Supervisors, of appropriate and compatible future land uses.

The Commission setting compatibility policy through a proposed 1* Zone enables the City of Ukiah to deliberately take steps to further study the feasibility of a future 5,000-foot runway, including through an update of the Airport Layout Plan. It also ensures any such further actions will be fully compatible with the UKIALUCP.

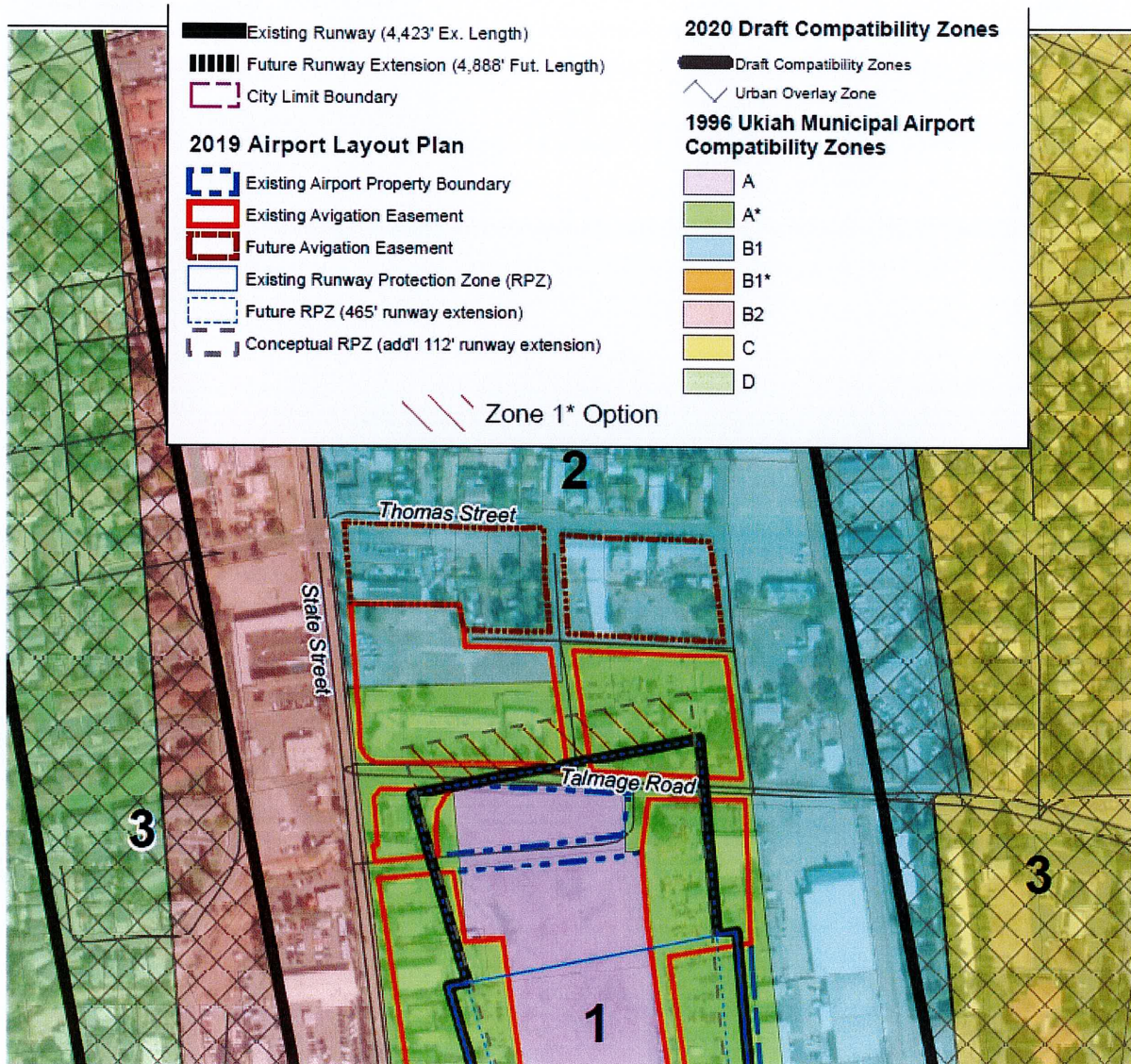
B. Within the 1* Zone, set compatibility criteria to be the same as criteria of the A* Zone within the 1996 ACLUP.

The A* Zone, denoted in the green color in the maps below, currently allows for up to 10 people per acre, with automobile parking normally acceptable and no new buildings or structures allowed. The City of Ukiah recommends establishing these same criteria for the proposed 1* Zone.

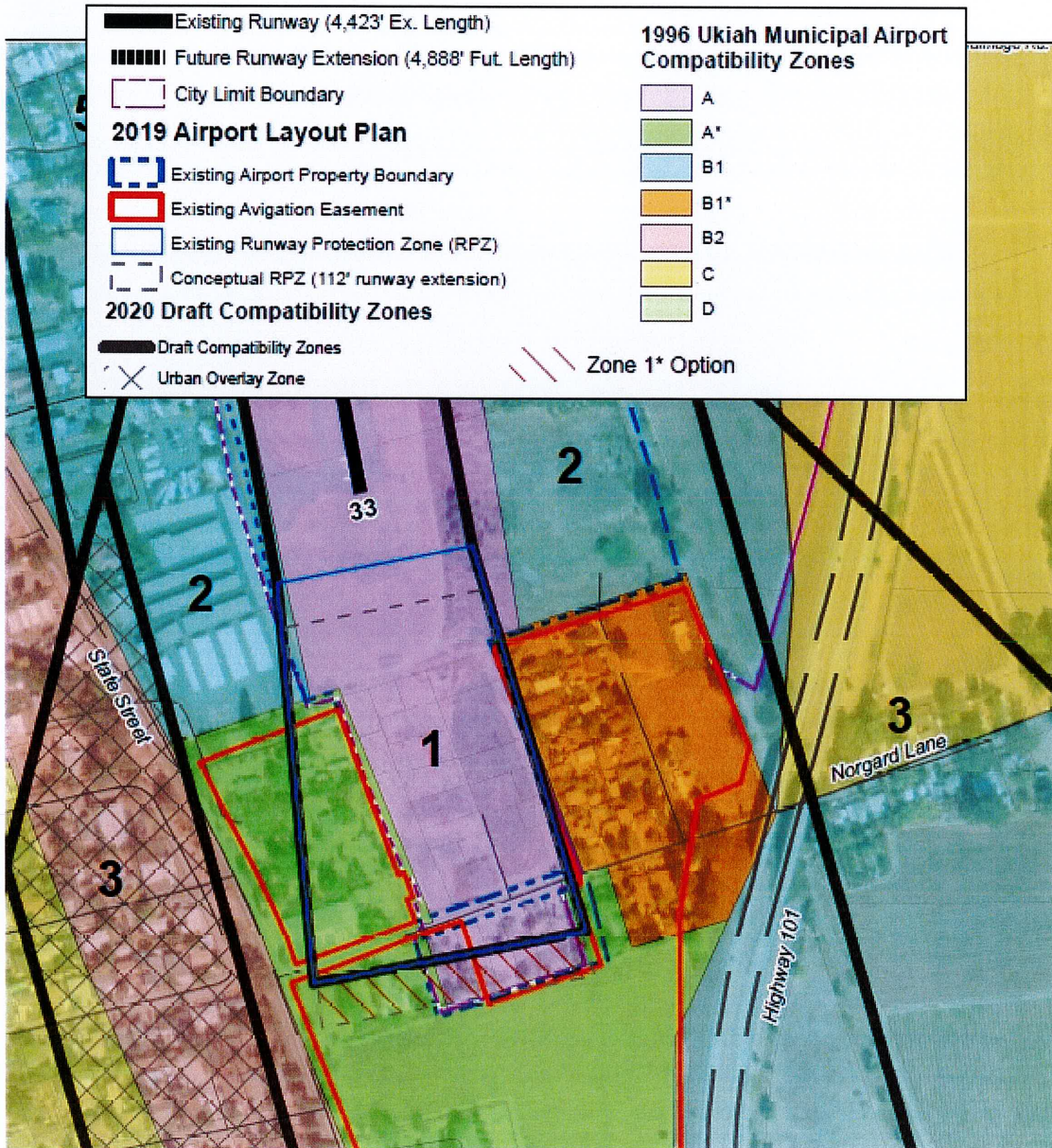
As denoted on the below maps, affected properties within the proposed Zone 1* are currently within the A* Zone in the 1996 ACLUP. By setting compatibility criteria in Zone 1* to be the same as in the A* Zone, there would be no additional land use restrictions for impacted property owners compared to the current ACLUP.

CEQA: Setting Zone 1* compatibility criteria to be the same as the Zone A* criteria is not expected to have environmental impacts related to the California Environmental Quality Act (CEQA). The environmental impacts related to the A* Zone were studied during the Initial Study prepared for the 1996 ACLUP, and the Zone 1* proposes no changes other than to reduce the area of the current A* Zone to areas just north and south of Zone 1. Areas to the immediate north and south of the proposed 1* Zone would be located in the new Zone 2 of the UKIALUCP, increasing density to 60 people per acre, as well as setting other new criteria. Consequently, Zone 1* is not expected to have a significant effect on the environment.

Map 1: Zone 1* Option (North)



Map 2: Zone 1* (South)





3. Options 1, 2, and 3 of the PBS Memo are not viable options for completing the UKIALUCP in a timely fashion, nor do they represent past direction from the Commission, the City Council, and the Board of Supervisors.

Option 1 of the PBS Memo is to put the UKIALUCP "on hold" until a future extension can be fully updated, including under CEQA. This is not a viable option as it would significantly delay the adoption of the UKIALUCP, resulting in impacts to housing and economic development activities within the entire Airport Influence Area (the City of Ukiah). Partly for these reasons, from the beginning of the preparation of the UKIALUCP, the direction from the Commission, City Council, and Board of Supervisors has been to complete the UKIALUCP as quickly as possible.

As discussed in 2B above, City staff has determined the proposed 1* Zone to not have a significant effect on the environment. City staff have also received an estimate and timeline from Mead & Hunt on pursuing a study for a future runway extension project. This process was estimated to be completed in approximately 1-2 years, provided funding was available, and at a cost of between \$85,000 and \$135,000.

Options 2 and 3 of the PBS Memo, as noted earlier in 2A of this letter, are not in keeping with the powers and duties of the Commission. These Options also set up the potential for a future issue of incompatibility and will inevitably result in significant delays to adoption of the UKIALUCP. Thus, all three options proposed by PBS staff would likely result in delays to the timely completion of the UKIALUCP, and in effect reduce the likelihood of a future runway extension.

Outreach to Property Owners: City of Ukiah staff reached out to property owners most likely to be affected by the proposed Zone 1*. A letter of support for the City Council's approved recommendation was submitted by Garton Tractor (Attachment 2). Other impacted property owners did not voice opposition to the proposed Zone 1*. However, property owners in the vicinity were not in support of any significant delay to adoption of the UKIALUCP.

In closing, City staff recommends the Commission direct staff to modify the draft UKIALUCP to immediately include the proposed 1* as described within this letter. This will allow for timely completion and adoption of the UKIALUCP, as well as setting policy to enable the potential for a future extension of the runway by the Ukiah Municipal Airport.

Sincerely,

A handwritten signature in blue ink that reads "Craig Schlatter". The signature is fluid and cursive, with a long horizontal stroke at the end.

Craig Schlatter
Community Development Director

Attachments: (2)



CC: Brent Schultz, Director, Mendocino County Planning and Building Services
Julia Acker-Krog, Chief Planner, Mendocino County Planning and Building Services
Maranda Thompson, Senior Planner, Aviation, Mead & Hunt
Ken Brody, Senior Project Manager, Aviation, Mead & Hunt
Greg Owen, Airport Manager, Ukiah Municipal Airport
Sage Sangiacomo, City Manager, City of Ukiah

Attachment 1

TECHNICAL MEMORANDUM



To: Mr. Craig Schlatter
City of Ukiah Community Development Director

From: Ken Brody, Senior Airport Planner, and
Maranda Thompson, Senior Project Manager

Date: October 20, 2020

Subject: Potential C-130 Operations at Ukiah Municipal Airport and
Implications for Draft Airport Land Use Compatibility Plan

THE ISSUE

CalFire is in the process of adding several C-130s to its fleet of fire attack aircraft in the state. There is a potential that the agency may seek to operate these aircraft at Ukiah Municipal Airport when circumstances warrant. Significantly, the C-130 is much larger than the S-2T aircraft now operating at the airport (132-foot wingspan versus 73 feet). The airport design features that would need to be modified to accommodate the C-130 (runway length, taxiway setbacks, parking area, etc.) have not yet been fully studied.

From an airport land use compatibility planning standpoint, however, the most critical feature would be the runway length. Preliminary CalFire information indicates that full functionality of the C-130 requires a minimum of 5,000 feet of runway length. Ukiah Municipal Airport currently has a runway length of 4,423 feet and the 2019 airport layout plan (ALP) approved by the city, the FAA, and Caltrans calls for extending the runway 465 feet to the north to a total length of 4,888 feet. The length of this extension was fixed by FAA airport design requirements for an object free area beyond the end of runways and the city's desire at the time to avoid the need to realign or close Hastings Avenue. Whether an additional extension of 112 feet is feasible and, if so, whether it could best be provided on the north or the south end of the runway is not known at this time. Nevertheless, the immediate question is whether the draft *Ukiah Municipal Airport Land Use Compatibility Plan* (ALUCP) now undergoing public review can be modified to better enable a longer runway than presently planned.

A major consideration in this regard is that state airport land use compatibility planning statutes dictate that ALUCPs be based upon a Caltrans-approved, current airport master plan or airport layout plan. A longer runway length as discussed above is not reflected in any current plans for the airport and updating those plans could be a costly and time-consuming process depending upon what documentation Caltrans would require. Thus, the focus in this memo is on whether more can be done within the present draft ALUCP to prevent future development that would add to the complexities of a further runway extension while still basing the ALUCP on the approved airport layout plan.

THE OPTIONS

Given the mandatory relationship between an updated ALUCP and the current ALP, it is important to first take a closer look at the currently established zones and criteria for the areas near the runway ends in order to identify options for how the draft ALUCP might be modified.

In conjunction with the northerly runway extension, the 2019 ALP shows a corresponding shift in the location of the runway protection zone (RPZ) (see **Figure 1**). The future RPZ would extend to Talmage Road. While most of the central sections of both the current and future RPZs are on airport property, outer corners of the future RPZ, especially to the east, would extend onto private property. The city controls aviation easements on these lands as well as on property abutting the north side of Talmage Road. These easements limit the allowable height of structures and vegetation on the underlying property and also restrict or prohibit lights, lighted signs, and other lighted objects and uses that generate radio or electromagnetic interference. The easements do not otherwise restrict the uses of the properties.

The 1996 *Mendocino County Airport Comprehensive Land Use Plan* (ACLUP) that currently remains in effect for the Ukiah Municipal Airport does, however, set additional restrictions on most of this land in what is called the A* Zone. The boundary of the A* Zone was set based on the 1996 ALP to encompass a larger RPZ that was required in accordance with FAA design standards that have since been modified. Note that, as shown in **Figure 1**, the A* Zone boundary extends slightly farther to the east and less far to the north than the area covered by aviation easements. The criteria for the A* Zone are the same as those for the remainder of the A Zone, all of which is on airport property. All new nonaeronautical structures are prohibited. Automobile parking is allowed provided that it attracts no more than 10 people per acre. Policy 6.1 indicates that “it is the intention of the City of Ukiah to provide long-term control of the land uses within these areas [A* and B1* Zones] by either acquiring the property in fee or obtaining approach protection easements restricting the type and density of land uses permitted.”

The city also controls aviation easements at the south end of the runway. The easement area encompasses all of the RPZ, the size of which is the same now as in the 1996 ALP. This area is reflected in the 1996 ACLUP that establishes A* and B1* Zones covering the affected private property (see **Figure 2**).

Three options are apparent for addressing the ALUCP issues brought on by the possible need to accommodate the C-130 at Ukiah Municipal Airport.

- **Option 1:** Adopt the current draft ALUCP by the end of the year as scheduled. During 2021, consult with Caltrans to determine what type of ALP documentation they would require to support an ALUCP that assumes a longer runway. The FAA can then be approached to see if they would provide funding support to ascertain runway length requirements for C-130 operations at Ukiah, to determine how the runway can best be further extended, and to update the ALP. Once the ALP has been updated, the ALUCP can be modified accordingly.

- **Option 2:** Immediately modify the draft ALUCP to include compatibility zone boundaries and/or criteria that would better preserve the potential for a longer runway. Any such modifications will need to be based upon features depicted in the 2019 ALP, specifically the current and proposed aviation easements. This can most readily be achieved by creating a Compatibility Zone 1*. This concept is supported by the existence of the A* Zone in the 1996 ACLUP.

Further, to reflect the fact that the affected area is mostly private property, the criteria should be less restrictive than for Zone 1 but more restrictive than the Zone 2 criteria. For example, future uses could be limited to very-low-intensity activities (30 people per acre maximum) such as storage or light industrial with uses such as retail, offices, and residential prohibited. Limits on the size of buildings also could be set.

- **Option 3:** Similar to Option 2, but uses a “conceptual RPZ” to protect for a possible need for a 5,000-foot long runway to serve future C-130 aircraft operations. The conceptual RPZ would either define the outer limits of Zone 1 or a new Zone 1*. The criteria for the extended zone could either be the same as Zone 1, which prohibits all new structures, or include slightly less stringent criteria. Note that the conceptual RPZ has not been validated by the City nor is it supported by the 2019 ALP. Therefore, this option puts the City and/or ALUC in a vulnerable position to defend new compatibility zone boundaries based on the conceptual RPZ.

Among the factors to be considered in choosing from these options, two in particular are important to highlight here.

- **Timing:** State airport land use planning statutes limit adoption of revisions to ALUCPs to once per calendar year. Thus, regardless of which option is chosen, it would be best if ALUC action is taken before the end of this year (2020) so that the ALUCP could be amended during 2021. Otherwise, any revisions would need to wait until 2022.
- **CEQA:** For Option 1, the necessary CEQA document has already been prepared and would not need to be revised for the immediate adoption of the ALUCP. Even for Options 2 and 3, CEQA document changes can arguably be avoided if the revised compatibility zones and criteria do not impose any greater restrictions on land uses than exist under the 1996 ACLUP now in effect. Increased restrictions would not only have CEQA implications but would also raise the specter of causing inverse condemnation.

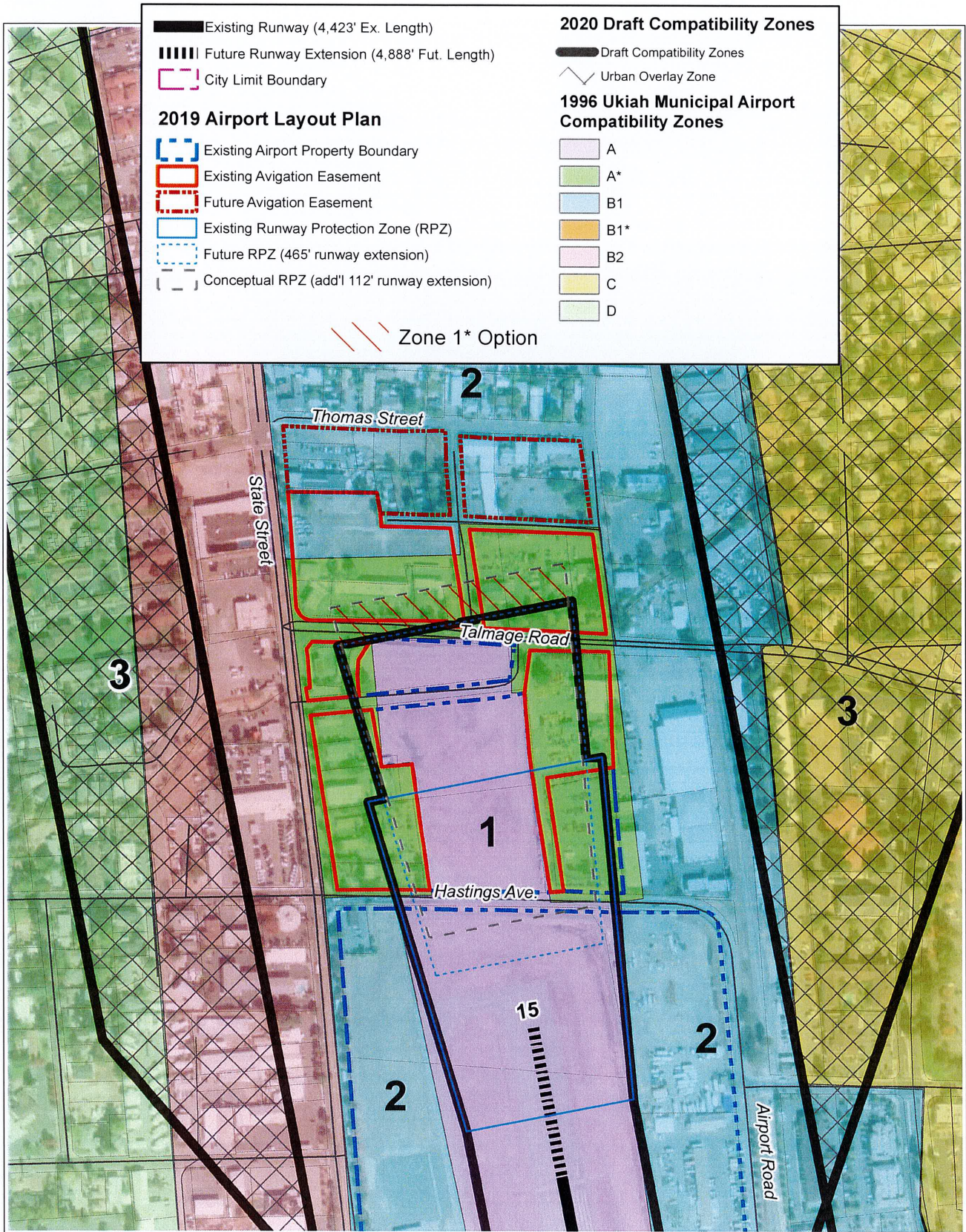


Figure 1

**Comparison Map:
Draft Zone 1 and 1996 Zone A* (North)**

Ukiah Municipal Airport

0 400 800 Feet



Source: Mead & Hunt, Inc.

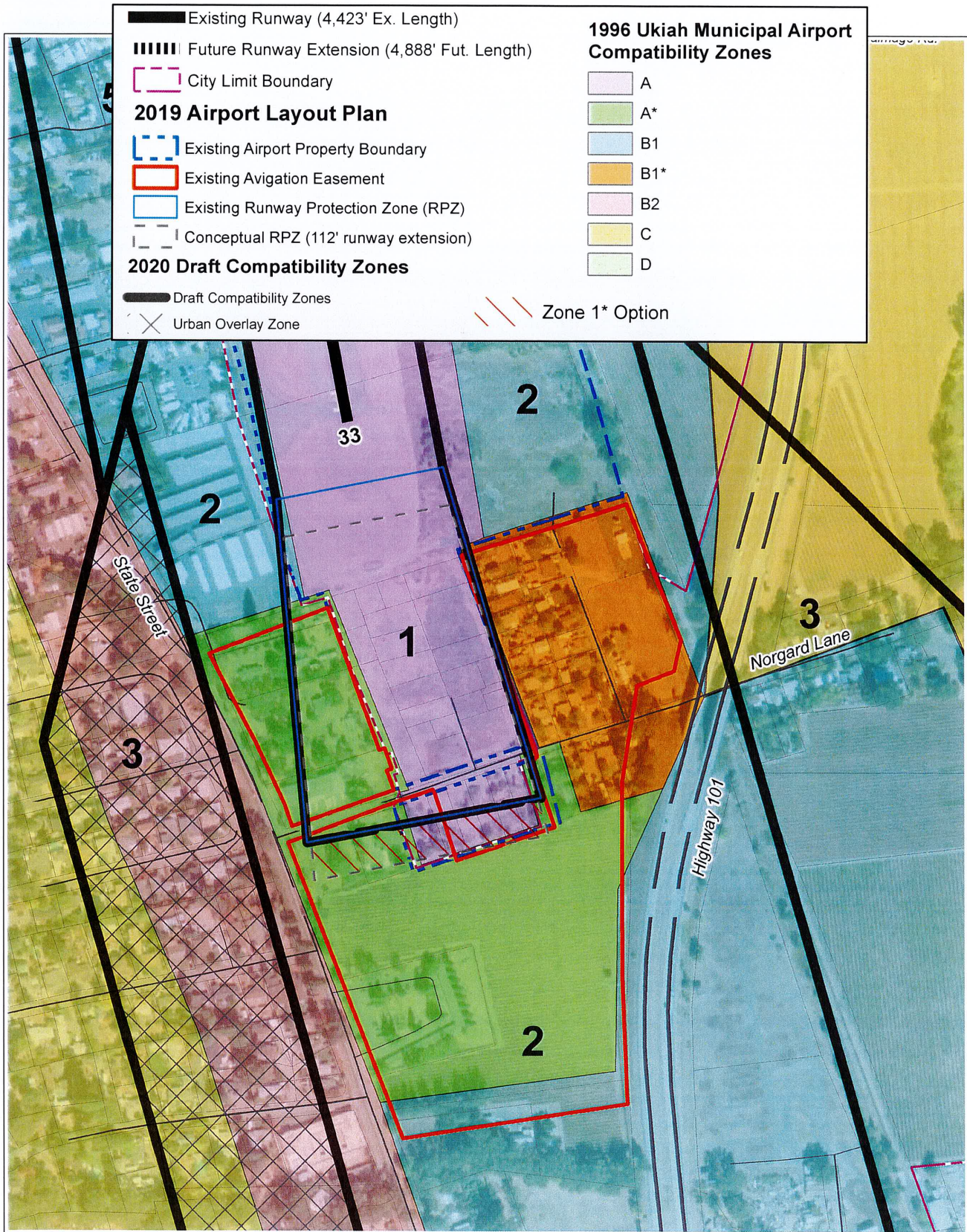
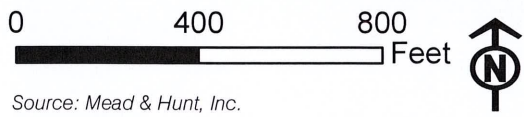


Figure 2



Source: Mead & Hunt, Inc.

**Comparison Map:
 Draft Zone 1 and 1996 Zone A* (South)**
 Ukiah Municipal Airport

Attachment 2

From: Brad Campbell <bcampbell@gartontractor.com>

Sent: Wednesday, November 18, 2020 2:54 PM

To: Sage Sangiacomo <ssangiacomo@cityofukiah.com>; Craig Schlatter <cschlatter@cityofukiah.com>;
Maureen Mulheren <mo@maureenmulheren.com>

Cc: Devon Jones <director@mendofb.org>; info@mendowine.com; billgarton@aol.com

Subject: Support for City Council Agenda Item 12.b

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

All,

Garton Tractor will be supporting agenda item 12. b. (Approval of Option #2 in the October 20, 2020 Mead & Hunt Technical Memorandum). With the information available we believe this option will best support the future growth of our business.

Thank you,

Brad Campbell

General Manager

Garton Tractor Inc. Ukiah

Store: 707 468-5880

Fax: 707 468-5881

Cell: