

ATTACHMENT 3

REVISED CEQA INITIAL STUDY AND NEGATIVE DECLARATION

(CLEAN)

REVISED CEQA INITIAL STUDY AND NEGATIVE DECLARATION

Ukiah Municipal Airport
Land Use Compatibility Plan

Prepared for
Mendocino County Airport Land Use Commission

Prepared by



Mead & Hunt, Inc.
Windsor, California
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May 2020 Draft, Revised January 2021

INITIAL STUDY

- 1. Project Title:** Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP)
- 2. Lead Agency Name and Address:** Mendocino County Airport Land Use Commission (ALUC)
860 N. Bush Street
Ukiah, CA 95482
- 3. Contact Person and Telephone/Email:** Julia Acker Krog, Assistant Director
County of Mendocino – Planning and Building Services
(707) 234-6650, ackerj@mendocinocounty.org
- 4. Project Location:** Ukiah Municipal Airport, including the City of Ukiah and the unincorporated area of Mendocino County
(See **Exhibits 5** and **6** at the end of this document)
- 5. Project Sponsor’s Name and Address:** Mendocino County Airport Land Use Commission
860 N. Bush Street
Ukiah, CA 95482
- 6. General Plan Designation(s):** Various. City: Residential, Commercial, Manufacturing, Downtown Core;
County: Commercial, Industrial, Agricultural, Suburban Residential
- 7. Zoning Designation(s):** Various: Residential of varying densities, Manufacturing & Industrial, Agricultural

8. Description of Proposed Project:

The creation of airport land use commissions and preparation of airport land use compatibility plans are requirements of the California State Aeronautics Act, Article 3.5, Public Utilities Code (PUC) Section 21670 *et seq.* As expressed by state law, the purpose of an airport land use commission is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public and military airports to the extent that these areas are not already devoted to incompatible uses. An airport land use commission achieves this goal by adopting an airport land use compatibility plan for each public-use airport within the County.

The Mendocino County Airport Land Use Commission (ALUC or ‘the Commission’) is established pursuant to California PUC Section 21670.4. The ALUC consists of seven members, two of which are required to have aviation expertise:

- Three members appointed by the County Board of Supervisors from the County Planning Commission,
- Three members appointed by the City Selection Committee of mayors of the county’s cities,
- One member at large appointed by the other six members of the Commission.

The Mendocino County ALUC is responsible for preparing and adopting an Airport Land Use Compatibility Plan (ALUCP) for each public-use airport it oversees: Boonville, Ells Field, Little River, Ocean Ridge, Round Valley, and Ukiah Municipal airports.

In 2019, the City of Ukiah (the City), as the owner and operator of the Ukiah Municipal Airport (the Airport), requested that the Mendocino County ALUC update the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP). The need for updating the ALUCP for Ukiah Municipal Airport is due to local and state level changes that have occurred since the plan was adopted in 1996. First, the countywide Mendocino County Airport Comprehensive Land Use Plan (MCACLUP) predates the latest guidance provided by the California Department of Transportation (Caltrans), Division of Aeronautics in the 2011 *California Airport Land Use Planning Handbook* (Handbook). Second, the current MCACLUP was based on the development proposals provided in the 1996 Ukiah Municipal Airport Master Plan, a plan which no longer fully reflects the city's planning for the Airport. In 2015, the City initiated a planning effort to update the Airport Layout Plan (ALP). The updated ALP was approved in 2016 by the Federal Aviation Administration (FAA) and reflects a future 465-foot northerly extension to Runway 15-33 for an ultimate runway length of 4,888 feet. However, the additional length would not be available for aircraft landing from the north; instead, pilots would continue to land at the existing Runway 15 landing threshold. In accordance with state law (PUC Section 21675(a)), Caltrans Division of Aeronautics accepted the ALP in May 2019 as the basis of this proposed UKIALUCP.

In November 2020, the Ukiah City Council approved a recommendation to the Mendocino County ALUC that the UKIALUCP update protect for a future 5,000-foot runway to accommodate future operations by CalFire Lockheed C-130 fire attack aircraft. At its meeting on November 19, 2020, the Mendocino County ALUC directed ALUC staff to revise the proposed UKIALUCP (Public Draft July 2020) and associated environmental document as recommended by the Ukiah City Council. The proposed revision to the draft UKIALUCP includes the addition of a Compatibility Zone 1* beyond Zone 1 at each end of the runway (Runway 15/33). Inclusion of a Zone 1* at both runway ends rather than just one preserves the option for the additional runway length to be provided on either the north or the south. Each Zone 1* encompasses the outer 112 feet of the Runway Protection Zone (RPZ) associated with a 5,000-foot runway length extended in one direction or the other. The compatibility criteria for Zone 1* match those of Zone A* in the 1996 MCACLUP for Ukiah Municipal Airport and is less restrictive than the criteria for Zone 1. Where Zone 1 precludes all future structures that are not aeronautical in function, Zone 1* allows very low intensity outdoor uses such as auto parking and storage with a maximum intensity of 10 people per acre.

The proposed UKIALUCP (the Project), including Addendum #1 with the proposed revisions to the draft UKIALUCP, is the focus of this Initial Study. The proposed UKIALUCP would replace the portions of the existing countywide current MCACLUP pertaining to the Ukiah Municipal Airport, which was adopted by the Mendocino County ALUC on October 21, 1993, and last revised on June 6, 1996. The current MCACLUP would remain in effect for the other airports in Mendocino County. A copy of the proposed UKIALUCP is presented as **Attachment A** and Addendum #1 with the proposed revisions to the draft UKIALUCP is presented in **Attachment B** to this Initial Study. The applicable sections of the proposed UKIALUCP include the policy chapters (Chapters 2 and 3) and the background chapter (Chapter 4).

Consistent with PUC Section 21674.7, preparation of the proposed UKIALUCP was guided by the information included in the Handbook. For example, the Handbook provides a set of generic safety zones that are based on nationwide aircraft accident location data. The safety zones divide an airport vicinity into as many as six safety zones, each representing a distinct level of risk:

- Safety Zone 1 and Zone 1*: Runway protection zone
- Safety Zone 2: Inner approach/departure zone
- Safety Zone 3: Inner turning zone
- Safety Zone 4: Outer approach/departure zone
- Safety Zone 5: Sideline zone
- Safety Zone 6: Traffic pattern zone

The proposed UKIALUCP applies the generic Handbook safety zones for a medium general aviation runway (length 4,000 feet to 5,999 feet) to the existing (4,423-foot) and future (4,888-foot) Runway 15/33 configurations. As described below, the Handbook safety zones are further refined to reflect the unique aeronautical factors at the Ukiah Municipal Airport. The adjusted safety zones establish the Compatibility Zones for the proposed UKIALUCP. The proposed UKIALUCP also considers the residential densities (dwelling units per acre) and non-residential intensities (people per acre) provided by the Handbook for each safety zone.

The proposed ALUCP for Ukiah Municipal Airport also reflects the anticipated growth of the Airport for the next 20 years as required by PUC Section 21675(a). The proposed UKIALUCP is based on the 2016 FAA-approved ALP showing a future 465-foot northerly runway extension and Airport noise contours reflect an ultimate aircraft activity forecast level of 30,916 annual operations.

Lastly, PUC Section 21675(c) requires an ALUC to consult with the involved agencies regarding establishment of the Airport Influence Area boundary. The proposed UKIALUCP was developed in coordination with the ALUC and its staff as well as the planning and airport staff members from the County of Mendocino and City of Ukiah.

Function of the ALUCP

The function of the proposed UKIALUCP is to promote compatibility between the Airport and the land uses in its vicinity to the extent that these areas have not already been devoted to incompatible uses. The plan accomplishes this function through establishment of a set of compatibility criteria applicable to new development around the Airport. Additionally, the proposed UKIALUCP serves as a tool for use by the ALUC in fulfilling its statutory duty to review plans, regulations, and other actions of local agencies and the Airport operator for consistency with the proposed UKIALUCP criteria.

Neither the proposed UKIALUCP nor the ALUC have authority over existing land uses or over the operation of the Airport. Additionally, the ALUC has no authority over federal, state, or tribal lands. Except in Zone 1, the proposed UKIALUCP also would not prohibit the construction of a single-family home (or secondary dwellings allowed by state law) on a legal lot of record if the use is permitted by local land use regulations.

The County of Mendocino and City of Ukiah have land use authority over the areas within the proposed Airport Influence Area and are expected to incorporate certain criteria and procedural policies from the proposed UKIALUCP into their respective general plans and zoning ordinances to ensure that future land use development will be compatible with the long-term operation of the Ukiah Municipal Airport. These local affected agencies also have the option of overruling the ALUC in accordance with the steps defined by state law (PUC Section 21676, 21676.5, or 21677).

Geographic Scope

The proposed UKIALUCP defines the Airport Influence Area as lands on which the uses could be negatively affected by current or future aircraft operations at the Airport as well as lands on which the uses could negatively affect Airport usage and thus necessitate restriction on those uses. The proposed Airport Influence Area for Ukiah Municipal Airport extends approximately 3.0 miles (16,000 feet) from the ends of the Airport's runway. The proposed Airport Influence Area encompasses land within the City of Ukiah and unincorporated areas of Mendocino County.

The Airport Influence Area for the proposed UKIALUCP considers the geographic extents of four types of compatibility concerns:

- **Noise:** Locations exposed to potentially disruptive levels of aircraft noise.
- **Safety:** Areas where the risk of an aircraft accident poses heightened safety concerns for people and property on the ground.
- **Airspace Protection:** Places where height and various other land use characteristics need to be restricted in order to prevent creation of physical, visual, or electronic hazards to flight within the airspace required for operation of aircraft to and from the Airport.

Exhibit 1 (revised January 2021) located at the end of this document depicts the Airport Influence Area and Compatibility Zones for the proposed UKIALUCP. The proposed Airport Influence Area and Compatibility Zone boundaries consider the following compatibility factors:

- **Noise** – Future noise contours reflecting an ultimate aircraft activity forecast level of 30,916 annual operations. The Compatibility Zones also consider the CalFire noise contours representing a typical fire event day with 44 departures and 44 arrivals split evenly between Runways 15 and 33. Aircraft type modeled is the Grumman S-2 Tracker (S-2T).
 - **Safety** – Generic safety zones provided in the 2011 Handbook are applied to the existing and future runway configurations in the manner listed below. The adjusted safety zones define Compatibility Zones 1 through 6 for the proposed UKIALUCP. Runway 15/33: Safety zones for a medium general aviation runway (length 4,000 feet to 5,999 feet) are applied to the existing (4,423-foot) and future (4,888-foot) runway configurations.
 - **Runway Protection Zone (RPZ):** Safety Zone 1 is based on the existing and future RPZs reflected in the 2016 ALP. Safety Zone 1* beyond each runway end encompasses the outer 112 feet of the RPZ associated with a 5,000-foot runway length extended either to the north or south.

- North Side Traffic Pattern: Although a future northerly extension of Runway 15 is proposed in the 2016 ALP, the landing threshold will be conterminous with the existing runway end. As such, Zone 2 is based on the existing runway configuration. Zone 4 is enlarged to include the northly portion of Zone 2 for the future runway configuration.
- East Side Traffic Pattern: Consistent with state guidance, safety zones on the west side of the Airport have been adjusted to reflect the Airport’s single-sided traffic pattern on the east side of the Airport, which is necessitated by high terrain located to the west. Accordingly, Zone 3 is truncated, and Zone 6 is omitted.
- Southern Traffic Pattern: Safety zones south of the approach end of Runway 33 are angled 5 degrees to the east to reflect the common practice used by pilots whereby flight routes align with Highway 101 when departing to the south or on approach to Runway 33.
- Overflight – Primary traffic patterns reflecting where aircraft operating at the Airport routinely fly.
- Airspace Protection – Outer boundary of the Obstruction Surfaces as defined by Code of Federal Regulation (CFR) Part 77, *Safe, Efficient Use and Preservation of the Navigable Airspace*. Surfaces associated with both the existing and future runway configurations are depicted. The Outer Conical Surface defines the Airport Influence Area for the proposed UKIALUCP. **Exhibit 2** defines the Airport Protection Surfaces for the Ukiah Municipal Airport.

Exhibits 1 (revised January 2021) and **2**, which present the policy maps for the proposed UKIALUCP, define the areas subject to the proposed UKIALUCP policies and criteria. The proposed Airport Influence Area constitutes the Referral Area within which certain land use actions and Airport actions are subject to ALUC review for a consistency determination with the proposed UKIALUCP. The proposed Compatibility Zones define the areas within which land use restrictions may be necessary to maintain airport land use compatibility.

Exhibit 3 compares the Airport Influence Area and Compatibility Zones in the current MCACLUP with those of the proposed UKIALUCP. **Exhibits 5** and **6** depict the proposed compatibility zones with the City’s and County’s land use designations. **Exhibits 3** through **6** also identify the areas that would experience increased restrictions under the proposed UKIALUCP compared to the current MCACLUP. **Exhibit 4** provides details as to the type of restriction that would apply (density or intensity restrictions).

As shown in **Exhibit 3**, the principal difference between the current MCACLUP and proposed UKIALUCP is that the zone boundaries in the current MCACLUP do not consider the Airport’s future runway length of 4,888 feet (reflecting a 465-foot northerly runway extension). The current MCACLUP also follows geographic features, such as road and parcel lines, while the proposed UKIALUCP boundaries follow the adjusted Handbook Safety Zones. Other notable differences include:

- Zone 1 (north) – Modified to reflect the existing and future Runway Protection Zone specified by the FAA-approved ALP.
- Zones 3 and 6 (west) – Truncated on west side to reflect one-sided traffic pattern on the east side of the Airport due to high terrain to the west.

- Zones 2 through 4 (south) – Angled 5-degrees to the east as noted above.
- Zones 3 and 4 (north, City) – The Handbook recommends that compatibility criteria provide for maintaining residential densities of the underlying zoning in urban environments. As such, an Urban Overlay is established in Zones 3 and 4 north of the Airport to reflect the existing urbanized land use patterns in the City’s downtown area. The Urban Overlay allows residential densities of up to 15 units per acre in Zone 3 and 35 units per acre in Zone 4.
- Zone 3 (southwest, County) – Includes an Urban Overlay in Zone 3 southwest of the Airport in unincorporated Mendocino County to reflect an existing (grandfathered) land use agreement allowing medium-density residential uses. The Urban Overlay allows residential densities of up to 15 units per acre in Zone 3.

Exhibits 7A through 7D identify the seven parcels that fall within the new proposed Zone 1* under the revised UKIALUCP (Final Draft January 2021). Under the draft UKIALUCP (Public Draft July 2020), portions of these parcels could be developed under Zone 2 criteria. Under the revised UKIALUCP (Final Draft January 2021), some or all the Zone 2 development potential is removed as these areas would become part of the more restrictive Compatibility Zone 1*. However, the criteria proposed for Zone 1* are identical to those that apply to this area under the currently adopted MCACLUP (1996).

9. Surrounding Land Uses and Setting

Ukiah Municipal Airport is owned and operated by the City of Ukiah and is located within the southern part of the city limits approximately 0.3 mile west of State Highway 101. Ukiah is situated within the southeastern corner of Mendocino County and is surrounded by hills to the west and south, Lake Mendocino to the northeast, and the Mayacamas Mountains to the east.

Land uses near the Airport are low-to-moderate-density urban to the north and west as well as immediately to the east between the Airport and highway. The city center is located to the north of the Airport. The areas south and east are mostly in unincorporated Mendocino County and dedicated to agriculture and commercial development. The City’s sphere of influence shows future annexation to the north and west.

Exhibits 5 and 6 depict the County and City land use designations within the Airport Influence Area and provide an aerial basemap to reflect existing land uses.

10. Other Public Agencies Whose Approval is Required

Although input from various entities is necessary, the ALUC can adopt the proposed UKIALUCP without formal approval from any other state or local agency. However, a copy of the plan must be submitted to the Caltrans Division of Aeronautics (PUC Section 21675(d)). The Caltrans Division of Aeronautics is required by state law (PUC Section 21675(e)) to assess whether the plan addresses the matters that must be included pursuant to the statutes and to notify the ALUC of any deficiencies. The statute also requires the ALUC to establish (or revise) the Airport Influence Area boundary only after “hearing and consultation with involved agencies” (PUC Section 21675(c)).

The proposed UKIALUCP policies can be implemented only by the local jurisdictions that have authority over land use within the Airport Influence Area, which are the County of Mendocino and the City of Ukiah in this case. State statutes require an agency to make its general plan consistent with an ALUCP within 180 days of ALUC adoption or to overrule the ALUC (Government Code Section 65302.3). If a jurisdiction chooses to overrule an ALUCP, the overrule procedure requires formal findings that the jurisdiction’s action is consistent with the intent of the state airport land use compatibility planning statutes and action by a two-thirds vote of the jurisdiction’s governing body (PUC Section 21676).

11. Summary of Potential Environmental Effects

In accordance with California Environmental Quality Act (CEQA), the purpose of this Initial Study is to inform decision makers and the public about the potential environmental impacts of the proposed project—the adoption and subsequent implementation of the proposed UKIALUCP—and to reduce those environmental impacts to the extent feasible. The outcome of the Initial Study is to determine what type of environmental document—a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report—is required of the proposed Project. For the purposes of this Initial Study, the following projects are considered:

- Proposed Project – Adoption of the proposed UKIALUCP with the Urban Overlay and Zone 1*,
- Project Alternative – Adoption of the proposed UKIALUCP without the Urban Overlay or Zone 1*,
- No Project Alternative – Retainment of the current MCACLUP (i.e., proposed UKIALUCP is not adopted).

The proposed UKIALUCP is regulatory in nature (PUC Section 21674, 21675, and 21675.1), and neither the project—the adoption of the proposed UKIALUCP—nor its subsequent implementation by local agencies will lead to any new development, construction, or any physical change to existing land uses or the environment.

The proposed UKIALUCP does not prohibit future development in the vicinity of the Airport but rather would affect where and what type of development could occur within the Airport Influence Area. The proposed UKIALUCP seeks to guide the compatibility of future land uses by limiting the density, intensity, height, and other features of new uses to avoid potential conflicts with Airport operations and to preserve the safety of those living and working around the Airport as well as of those in flight. Therefore, the proposed UKIALUCP may indirectly influence future land use development patterns near the Airport by enabling development in some locations (to the extent that such development is consistent with local agency general plans) and constraining development in other locations.

Any indirect effect that may arise from shifts in future development patterns is uncertain because potential shifts cannot be accurately predicted as to when, where, or to what extent the development may occur. The environmental impacts of such shifts or “displacement” are speculative and, therefore, are reasonably considered to be less than significant for purposes of this CEQA analysis (Title 14, California Code of Regulations, Chapter 3, Article 10, §15145). This finding of less than significant is further supported by the fact that state law (Government Code 65302.3) requires a local agency to amend its general plan and any applicable specific plan to be consistent with the ALUCP. Therefore, any conflicts identified in the Initial Study would be alleviated by the local agency amending the applicable plan to be consistent with the ALUCP or, alternatively, overruling the ALUC by adopting findings pursuant to PUC Section 21676. These actions are the responsibility and purview of the local agency, not the ALUC.

The need to analyze displacement as part of the environmental impact analysis for adoption of an ALUCP stems from a 2007 California State Supreme Court Case, *Muzzy Ranch Co. v. Solano County Airport Land Use Commission*.¹ Among other things, in its decision in that case the court found that “...placing a ban on development in one area of a jurisdiction may have the consequence, notwithstanding existing zoning or land use planning, of displacing development to other areas of the jurisdiction.” While an ALUCP does not and need not determine where the displaced development would move to—and, indeed, ALUCs have no authority by which to make such a decision—the extent of the conflict that results in the displacement must be analyzed.

Although policies in the proposed UKIALUCP would influence future land use development patterns within the Airport Influence Area, the proposed UKIALUCP would not increase levels of development above those projected within the general plans adopted by the affected local agencies. The environmental effects of development proposed in the adopted general plans have already been adequately analyzed in previously certified environmental documentation and policies and/or mitigation measures have been adopted that would reduce those environmental effects. Additionally, any future development proposals would be subject to CEQA, ensuring that potential impacts are studied, disclosed, and mitigated, as appropriate.

For the reasons stated above, the proposed UKIALUCP would not result in any direct impacts to the following environmental categories: Aesthetics; Agriculture/Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Geology/Soils; Greenhouse Gas Emissions; Hazards/Hazardous Materials; Hydrology/Water Quality; Mineral Resources; Noise; Recreation; Transportation/Traffic; and Utilities/Services Systems.

No environmental categories would be affected by this project to the extent of having a “Potentially Significant Impact.” Four environmental impact categories, Biological Resources, Land Use and Planning, Population and Housing, and Public Services, are identified as having a “Less than Significant Impact.” Appropriate discussions are provided for other impact categories that warrant explanation.

As described in Section 4, *Biological Resources*, the Airport Influence Area for Ukiah Municipal Airport is within the Mendocino Redwood Company Natural Community Conservation Plan (NCCP). An NCCP identifies and provides for the regional protection of plants, animals, and their habitats while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the U.S. Fish and Wildlife Service provide the necessary support, direction, and guidance to NCCP participants.² The NCCP does not propose new or enhancement of existing wildlife habitat within the Airport Influence Area established by the proposed UKIALUCP. A biological resource assessment will be conducted for proposed development projects where there may be a special-status species or critical habitat on the project site. The proposed UKIALUCP does not grant development rights like a local agency’s general plan or zoning. Therefore, no conflicts exist between the NCCP and proposed UKIALUCP.

As described in Section 10, the general plan policies and land use maps for the County of Mendocino and the City of Ukiah were reviewed for consistency with the proposed UKIALUCP; while no direct conflicts exist between the general

¹ *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal.4th 372.

² Source: <https://wildlife.ca.gov/Conservation/Planning/NCCP>.

plan policies and the proposed UKIALUCP policies, the County and City will each be required to update the compatibility information contained in its respective land use plans to reflect the proposed UKIALUCP. The analysis also determined that several general plan land use designations shown in the local agencies' zoning maps directly conflict with the proposed UKIALUCP density criteria (see **Exhibits 4, 5, 6, and 8**). Based on these findings, the County and City will be required to make minor changes to their respective general plan, specific plans, and/or implementing ordinances to be fully consistent with the proposed UKIALUCP or to take action to overrule the ALUC.

As described in Section 14, a housing displacement analysis was conducted to determine if the County and City could satisfy their shares of the regional housing needs if the proposed UKIALUCP restricted future residential development within portions of the Airport Influence Area. The analysis found that while there was a potential for displacing future housing units within portions of the Airport Influence Area, the displacement of future housing was deemed to be less than significant because the amount of displacement was negligible, the housing units could be accommodated in other areas of the Airport Influence Area and the County and City could fulfill their obligations associated with the Regional Housing Needs Allocation.

As described in Section 15, *Public Services*, adoption and implementation of the proposed UKIALUCP would create a temporary increase in the staff workloads of the affected local agencies as a result of the state requirement to modify local general plans for consistency with the ALUCP. However, this effect would be temporary. Over the long term, the procedural policies included in the proposed UKIALUCP are intended to simplify and clarify the ALUC project review process and thus reduce workloads for the Mendocino County ALUC and local agency planning staff members.

12. Consultation with California Native American Tribes

The authority of the ALUC does not extend to state, federal, or tribal lands. Lands controlled (i.e., owned, leased, or in trust) by federal or state agencies or by Native American tribes are not subject to the provisions of the state ALUC statutes or the proposed UKIALUCP. The project does not propose any new development, construction, or physical change to the environment; therefore, there will be no disturbance of land or culturally significant resources. No tribal consultation is required for this project.

REFERENCES

The following references are cited in the text that follows for the Initial Study.

1. Association of Environmental Professionals. 2020 CEQA California Environmental Quality Act Statues and Guidelines, Appendix G: Environmental Checklist Form. January 1, 2019.
2. California Department of Fish and Wildlife. NCCP Plan Summary – Mendocino Redwood Company NCCP/HCP. Amended July 31, 2017.
3. City of Ukiah. Housing Element Update 2019-2027. October 2019.
4. City of Ukiah. Ukiah Municipal Airport Master Plan Report. July 1996.
5. City of Ukiah. Ukiah Municipal Airport Layout Plan (ALP). January 2016.
6. City of Ukiah. Ukiah General Plan. December 6, 1995.
7. City of Ukiah. Ukiah General Plan Map. December 16, 2004.
8. City of Ukiah. City of Ukiah Zoning Map. February 2017.
9. City of Ukiah. Ukiah Compatibility Zoning Map. July 1996.
10. County of Mendocino. Mendocino Zoning Display Map. December 5, 2018.
11. County of Mendocino. Regional Housing Needs Plan. August 2019.
12. County of Mendocino. Ukiah Valley Area Plan. August 2011.
13. Federal Aviation Administration. Airport Master Record (Form 5010). March 2019.
14. Mendocino County Airport Land Use Commission. Mendocino County Airport Comprehensive Land Use Plan. Adopted October 21, 1993 and last amended on June 6, 1996.
15. State of California Department of Transportation (Caltrans), Division of Aeronautics. California Airport Land Use Planning Handbook. October 2011.

DETERMINATION

Completed by Lead Agency: Mendocino County Airport Land Use Commission

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Julia Acker Krog
Signature

4/16/2021
Date

Julia Acker Krog
Print Name

Asst. Director
For

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

CATEGORY	ANALYSIS SUMMARY (See individual pages for details, Pg #s revised January 2021)					
	Pg	Potentially Significant Impact				
		Less than Significant Impact with Project Mitigation				
		Less than Significant Impact				
		No Impact				
Comments (Also see discussion above starting on page 7, Topic 11)						
1. AESTHETICS	14	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to aesthetic resources.
2. AGRICULTURE/FORESTRY RESOURCES	15	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to agricultural or forestry uses within the AIA or result in conversion to other uses.
3. AIR QUALITY	16	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to air quality.
4. BIOLOGICAL RESOURCES	17	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	f) Airport is within the Mendocino Redwood Company Natural Community Conservation Plan Area
5. CULTURAL RESOURCES	19	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to cultural impacts.
6. ENERGY	20	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to energy resources.
7. GEOLOGY/SOILS	21	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to geology, soils, or seismicity.
8. GREENHOUSE GAS EMISSIONS	22	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to greenhouse gas emissions.
9. HAZARDS/HAZARDOUS MATERIALS	23	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	ALUCP limits exposure of people to aircraft accident hazards by restricting risk-sensitive uses in airport vicinity and limits the storage of hazardous materials.
10. HYDROLOGY/WATER QUALITY	25	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to hydrology and water quality.
11. LAND USE/PLANNING	26	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minor modifications needed to local Land Use Plans
12. MINERAL RESOURCES	33	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to mineral resources.

13. NOISE	34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	ALUCP limits exposure of people to noise but does not regulate aircraft operations
14. POPULATION/HOUSING	36	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Potential exists for displacement of housing units
15. PUBLIC SERVICES	40	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Negligible effect on special districts, school districts, and community college districts as well as government staff workloads
16. RECREATION	41	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to recreation.
17. TRANSPORTATION/TRAFFIC	42	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to on-ground transportation and traffic. Adoption and implementation of proposed UKIALUCP will not result in changes to air traffic patterns.
18. TRIBAL CULTURAL RESOURCES	43	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to tribal cultural resources.
19. UTILITIES/SERVICE SYSTEMS	44	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impacts to utilities and service systems.
20. WILDFIRE	45	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No direct or indirect impairment to an adopted emergency response or evacuation plan, exacerbation of wildfire risks, or exposing of people or structures to significant risks.
21. MANDATORY FINDINGS OF SIGNIFICANCE	46	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No cumulative impacts

ENVIRONMENTAL CHECKLIST

1. Aesthetics

Except as provided in Public Resources Code Section 21099.

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - d): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and the City of Ukiah General Plan indicate that Mendocino County encompasses an outstanding variety of natural vistas, landscapes, water resources, and Scenic Byways. Although the Plans provide lists and maps of known scenic resources, the Plans indicate that the policies and actions pertain to all scenic resources, not just those that are listed and mapped. No mapped resources are contained within the proposed Airport Influence Area for Ukiah Municipal Airport. The proposed UKIALUCP is regulatory in nature; it does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to aesthetic resources.

Mitigation

None required.

2. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - e): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and the City of Ukiah General Plan indicates that the eastern portions of the proposed Airport Influence Area include prime farmland and farmland of statewide importance. ALUCP Policy 3.1.4, *Land Use Conversion*, encourages preservation of existing agricultural and open spaces. Additionally, the proposed UKIALUCP is regulatory. It does not provide for any physical change to the environment that would directly or indirectly conflict with agricultural or forestry use within the proposed Airport Influence Area or result in their conversion to other uses.

Mitigation

None required.

3. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - d): See Summary of Potential Environmental Effects (No. 11 on page 7). Mendocino County lies within the North Coast Air Basin and air quality is locally regulated by the Mendocino County Air Quality Management District. Both the Mendocino County General Plan and City of Ukiah General Plan include policies ensuring that development proposals adhere to federal, state, and district requirements. Although the proposed Airport Influence Area has the potential to contain a wide variety of sensitive receptors, both known and unknown, the proposed UKIALUCP is regulatory in nature. Therefore, it does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to air quality.

Mitigation

None required.

4. Biological Resources

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a - e): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and City of Ukiah General Plan indicate known locations of special status species (plant and animal) and sensitive habitats within the proposed Airport Influence Area. Therefore, the proposed Airport Influence Area has the potential to contain a wide variety of biological resources, both known and unknown. The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to biological resources.

f): The proposed Airport Influence Area encompasses lands within the Airport and is within the Mendocino Redwood Company Natural Community Conservation Plan (NCCP). This plan, which is being coordinated by the Mendocino

Redwood Company, identifies and provides for the regional protection of plants, animals, and their habitats while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the U.S. Fish and Wildlife Service provide the necessary support, direction, and guidance to NCCP participants.

The proposed UKIALUCP would prohibit creating or enhancing existing wildlife habitat areas within the proposed Airport Influence Area if the habitat would attract hazardous wildlife to the Airport environs (e.g., birds). This proposed UKIALUCP prohibition could potentially conflict with the NCCP objectives. For example, under the proposed UKIALUCP, new development projects proposed within the Airport Influence Area would be precluded from providing “on-site” restoration of habitat areas. However, the proposed UKIALUCP would allow new development projects to mitigate their impacts through off-site habitat restoration, clustering development, and/or project design. The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly conflict with the provisions of the NCCP. Additionally, potential indirect conflicts are deemed to be less than significant as the proposed UKIALUCP would enable achievement of the NCCP objectives of protecting natural resources in areas outside of the Airport Influence Area.

Mitigation

None required.

5. Cultural Resources

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - c): See Summary of Potential Environmental Effects (No. 11 on page 7). Cultural resources in Mendocino County include archaeological resources, historic resources, and cultural resources related to Native Americans. The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to cultural resources.

Mitigation

None required.

6. Energy

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - b): See Summary of Potential Environmental Effects (No. 11 on page 7). Renewable energy plants are incompatible in Zones 1 through 3 but are conditionally compatible in Zones 4 through 6 if the site outside the zone would not serve intended public function. All facilities and associated power lines must meet airspace protection criteria (i.e. height, thermal plumes, glare, etc.). The proposed UKIALUCP establishes restrictions and FAA notification requirements of proposed objects and height limits of objects near airports. Boundaries of the FAA notification area for the Airport are depicted on **Exhibit 2, Airspace Protection Zone**. Wind energy systems are not compatible in the vicinity of an airport if they are prohibited by a comprehensive land use plan or any implementing regulations adopted by the ALUC. The proposed UKIALUCP provides guidance on risk-sensitive uses (uses that potentially pose safety concerns regardless of the number of people present, hazardous materials, and community critical infrastructure) that could have a community-wide impact.

The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to energy resources.

Mitigation

None required.

7. Geology and Soils

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - f): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed Airport Influence Area has the potential to contain a wide variety of geology, soils, or seismicity, both known and unknown. However, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to geology, soils, or seismicity.

Mitigation

None required.

8. Greenhouse Gas Emissions

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - b): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and City of Ukiah General Plan includes policies addressing atmosphere and climate change. The Mendocino County General Plan and City of Ukiah General Plan indicate that the City maintains a Climate Action Plan that identifies programs and actions to reduce greenhouse gas emissions to meet the Council’s greenhouse gas reduction goal. Nevertheless, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to greenhouse gas emissions.

Mitigation

None required.

9. Hazards and Hazardous Materials

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a – d, f – g): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed UKIALUCP includes land use compatibility policies that prohibit or restrict land uses that manufacture, process and/or store bulk quantities of hazardous materials within the proposed Airport Influence Area. Nevertheless, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in creating a significant hazard to the public or the environment.

e): Pursuant to the State Aeronautics Act, the purpose of the proposed UKIALUCP is to minimize the public's exposure to excessive noise and safety hazards within the Airport vicinity. Therefore, adoption and implementation of the proposed UKIALUCP would have a beneficial impact by restricting development that would expose people within the Airport Influence Area to Airport-related safety hazards including aircraft accidents.

The proposed UKIALUCP uses the aircraft accident risk data and safety compatibility concepts provided in the *California Airport Land Use Planning Handbook* (Caltrans, 2011) to establish Airport land use compatibility zones to include areas exposed to significant safety hazards. The proposed UKIALUCP also establishes safety criteria and policies that limit concentrations of people within the compatibility zones. The purpose of the policies is to minimize the risks and potential consequences associated with an off-Airport aircraft accident or emergency landing. The policies consider the risks both to people and property in the vicinity of the Airport and to people on board the aircraft.

The risks of an aircraft accident occurrence are further reduced by airspace protection policies that limit the height of structures, trees, and other objects that might penetrate the Airport's airspace as defined by Federal Aviation Regulations (FAR), Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*. The airspace protection policies also restrict land use features that may generate other hazards to flight such as visual hazards (i.e., smoke, dust, steam, etc.), electronic hazards that may disrupt aircraft communications or navigation, and wildlife hazards (i.e., uses which would attract hazardous wildlife to Airport environs). Therefore, no impact is anticipated as a result of the adoption and implementation of the proposed UKIALUCP.

Mitigation

None required.

10. Hydrology and Water Quality

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k) Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - k): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and City of Ukiah General Plan include policies aimed at protecting the quantity and quality of water for public health and aquatic life. The most critical surface water quality problem in Mendocino County is sedimentation—the carrying of dust and soils into bodies of water. Major sources of sediment include erosion from barren or poorly vegetated soils, erosion from the toes of slides along stream channels, and sediments from roads. Goals RM-2 and RM-3 of the County’s General Plan seek to protect and enhance water resources and quality. At the same time, Policies RM-19:RM-23 speak to the County’s Water Quality policies, some of which overlap with the City of Ukiah especially as it concerns the integration of storm water best management practices. Nevertheless, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to hydrology and water quality.

Mitigation

None required.

11. Land Use and Planning

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed ALUCP is regulatory in nature; it does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in physically dividing an established community.

State law (Government Code Section 65302.3) requires each local agency having jurisdiction over land uses within an ALUC’s planning area, also referred to as the Airport Influence Area, to modify its general plan and any affected specific plans to be consistent with the ALUCP. The law says that the local agency must take this action within 180 days of ALUCP adoption or amendment. The only other course of action available to local agencies is to overrule the ALUC by, among other things, a two-thirds vote of its governing body after making findings that the agency’s plans are consistent with the intent of state airport land use planning statutes (PUC Section 21676(b)). A general plan does not need to be identical with an ALUCP in order to be consistent with it. To meet the consistency test, a general plan must do two things:

1. It must specifically address compatibility planning issues, either directly or through reference to a zoning ordinance or other policy document; and
2. It must avoid direct conflicts with compatibility planning criteria.

With regard to the proposed UKIALUCP, the County of Mendocino and the City of Ukiah are the only two general purpose government entities having land use jurisdiction in the proposed Ukiah Municipal Airport Influence Area. As such, once the proposed UKIALUCP is adopted by the ALUC, these agencies will be required to amend their general plans and/or implementing ordinances to be consistent with the proposed UKIALUCP or to take action to overrule the ALUC.

The general plan consistency review detailed below focuses on two types of inconsistencies:

1. Adopted general plan policies pertaining to airport land use compatibility planning that either directly conflict or need to be amended to reflect changes in the proposed UKIALUCP policies and maps; and
2. Land use designations provided in the adopted general plan land use map or zoning map that may conflict with the proposed UKIALUCP criteria.

General Plan Policies

The Mendocino County General Plan includes policies addressing airport land use compatibility. The policies direct the County to consider and be consistent with the 1996 MCACLUP when making General Plan and Zoning decisions. The County also implements an Airport Compatibility Overlay Zone that identifies land within unincorporated Mendocino County where additional requirements apply to ensure compatibility of land uses and development with nearby airport operations. The Airport Compatibility Overlay Zone coincides with the Airport Influence Area designated by the Mendocino County ALUC in its 1996 MCACLUP.

The Ukiah General Plan includes policies and actions pertaining to airport land use compatibility. The policies in the Land Use element call for establishing airport overlay zoning districts that closely mirror the safety, noise, and compatibility standards in the 1996 MCACLUP as a means of reducing land use conflicts near the airport. The City's zoning code establishes two airport-overlay zoning districts. The Airport Environs (AE) overlay district regulates land uses that may affect navigable airspace consistent with 14CFR Part 77. The Airport Operations (AO) overlay zone regulates land uses in the vicinity of the airport consistent with the 1996 MCACLUP.

Table A below summarizes the existing land use compatibility measures established by the County of Mendocino and City of Ukiah.

Established Compatibility Measures

- *Mendocino County General Plan (Adopted August 2009)*
 - Policy DE-165: Improve airport facilities and encourage economic development and uses that support airport viability.
 - Policy DE-166: Land use decisions and development should be carried out in a manner that will reduce aviation-related hazards (including hazards to aircraft, and hazards posed by aircraft). This could be accomplished through a variety of measures, including the following: maintaining compatible zoning, land uses, densities, and intensities within airport influence zones; protecting the viability of existing airport operations and expansion potential.
 - Policy DE-167: Development in air traffic patterns, corridors, and airport influence zones shall be consistent with the Mendocino County Airport Comprehensive Land Use Plan and California Division of Aeronautics and Federal Aviation Administration regulations.
 - Action Item DE-167.1: Update the Airport Comprehensive Land Use Plan when changes in the aviation sector or airport use warrant a revision of land use restrictions.
- *Ukiah Valley Area Plan, Section 3, Land Use and Community Development (Adopted by Mendocino County August 2, 2011)*
 - Goal LU2: Promote compatible land uses adjacent to important transportation facilities and protect against incompatible ones.
 - Policy LU 2.1: Define acceptable standards for development in the vicinity of the airport.
 - Policy LU 2.1a: Clear Zone: Prohibit development in the clear zone as defined in the Ukiah Municipal Airport Master Plan.
 - Policy LU 2.1b: Compatibility Guidelines: Only allow development within each airport zone that conforms to the height, use, and intensity specified in the land use compatibility table of the ACLUP. As airports evolve and fuel prices change, collaborate with the City of Ukiah, the County Airport Land Use Commission, and Caltrans Aeronautics to reassess compatibility issues.
- *City of Ukiah General Plan (Adopted December 6, 1995)*
 - Goal AE-1: Promote the airport for the community's benefit both now and in the future
 - Policy AE-1.1: Recognize that the airport's vitality and growth help achieve the General Plan Vision.
 - Goal AE-2: Provide for long-term viability of the airport.
 - Policy AE-2.1: Define the long-term growth boundaries for the airport.
 - Goal AE-3: Establish uniform ordinances and regulations for land use in the airport's core and peripheral overlay zones.
 - Policy AE-3.1: Work with the County to develop a similar or duplicate implementing code for development in and around the airport.
 - Policy AE-3.2: Promote acceptable land uses for both city and county zones in the core and peripheral zone areas.
 - Goal AE-4: Promote a "good neighbor policy" by the airport and its users.
 - Policy AE-4.1: Develop a Noise Control program.
 - Policy AE-4.2: Identify common noise levels in and around the airport to identify "airport-specific" noise.
- *Ukiah Valley Area Plan, Section 5, Circulation and Transportation (Adopted by Mendocino County August 2, 2011)*
 - Goal CT1: Provide for efficient and safe circulation networks throughout the Ukiah Valley.
 - Policy CT1.1: Promote the development of an integrated transportation corridor through the Valley
 - Policy CT1.1a Identification of Integrated Transportation Corridor: work with local and regional agencies to define and develop an integrated transportation corridor. The integrated transportation corridor shall encompass U.S. Highway 101; major thoroughfares; and rail, air, and public transportation to proactively manage travel demand by identifying underutilized capacity in the corridor and shift travel demand accordingly.

Source: Data Compiled by Mead & Hunt (March 2020)

Table A

General Plan Policies
County of Mendocino and City of Ukiah

General Plan Policy - Findings

Compared to the Ukiah Municipal Airport section of the current MCACLUP, the proposed UKIALUCP includes changes to the shape and size of the Compatibility Zones as well as the compatibility criteria applicable within each Compatibility Zone consistent with statewide compatibility guidance. In accordance with Government Code Section 65302.3, these changes will require both the County and City to amend their respective land use planning documents (i.e., General Plans and Overlay Zoning Districts) to be consistent with the proposed UKIALUCP or take steps to overrule the ALUC. This step will be necessary as confirmation that the County and City intend to adhere to the proposed UKIALUCP compatibility criteria rather than those in the current MCACLUP. To attain consistency with the proposed UKIALUCP, the general plans need only reference the proposed UKIALUCP by name and date. Additionally, the County and City airport-related overlay zoning districts and zone boundaries will need to be amended to specifically reflect the Airport Influence Area, Compatibility Zones, and criteria of the proposed UKIALUCP once adopted by the Mendocino County ALUC.

Land Use Designations

To achieve general plan consistency with the proposed UKIALUCP, there should be no direct conflicts between planned land uses in the local jurisdictions' general plan maps and the proposed UKIALUCP criteria. Existing land uses that may conflict can remain, as can general plan land use designations that reflect them, as the Mendocino County ALUC has no authority over existing land uses. The proposed UKIALUCP compatibility zones and criteria are the primary policy instruments used in determining if the general plan's land use designations are consistent with the proposed UKIALUCP.

Land Use Designations – Evaluation

As described above, the proposed UKIALUCP includes extending the Airport Influence Area to the north by 465-feet to reflect the future runway extension shown in the FAA-adopted Ukiah Municipal Airport Layout Plan. Additionally, the proposed UKIALUCP proposes changes to the shape and size of the UKI Compatibility Zones from those in the current MCACLUP based on current statewide compatibility guidance. **Exhibit 3** compares the Compatibility Zones from the 1996 MCACLUP with those of the proposed UKIALUCP. The areas where the proposed UKIALUCP would impose greater restrictions on future land uses compared to the current MCACLUP are identified in red.

Exhibit 5 tabulates the degree to which the proposed UKIALUCP density (dwelling units per acre) and intensity (people per acre) criteria are more stringent than those of the current MCACLUP. For example, within the current MCACLUP Zone B2, the density limit is 0.5 dwelling units per acre (2-acre lots) with infill development allowed in the City of Ukiah of up to 28 dwelling units per acre. The proposed UKIALUCP limits residential densities in the corresponding zone to a maximum of 0.1 dwelling units (10-acre lots) and does not include a provision for infill development. As such, within the unincorporated portions of the County, future residential densities would be reduced from 0.5 dwelling units per acre (2-acre lots) down to 0.1 dwelling units per acre (10-acre lots) to maintain consistency with the proposed UKIALUCP. Within the incorporated portions of the City of Ukiah, residential densities would be reduced from 28 dwelling units per acre to 0.1 dwelling units per acre (10-acre lots).

Exhibit 5 also identifies where the proposed UKIALUCP restrictions are less stringent than those of the current MCACLUP. For example, within Zones 3 and 4, the proposed UKIALUCP provides an Urban Overlay Zone allowing residential densities of up to 15 dwelling units per acre in Zone 3 and 35 dwelling units per acre in Zone 4.

The following consistency evaluations were conducted to identify potential conflicts between the proposed UKIALUCP and local general plan land use designations:

1. Nonresidential Uses – A qualitative assessment is conducted to determine the degree to which the proposed UKIALUCP would restrict future nonresidential land use development within the proposed Airport Influence Area. The assessment focuses on where the proposed UKIALUCP intensity criteria (people per acre) are either more stringent or less stringent than the intensity criteria of the current MCACLUP.
2. Residential Uses – The assessment compares the density (dwelling units per acre) criteria of the proposed UKIALUCP with the density limits provided under the County’s and City’s zoning classifications.

Nonresidential Land Use Evaluation

Exhibit 5 identifies the zones wherein the intensity criteria of the proposed UKIALUCP are more restrictive than the current MCACLUP criteria (e.g., portions of Zones 1, 2, 3, and 6). In these areas, future nonresidential development may be prohibited or restricted to ensure that the proposed land use complies with the intensity criteria of the proposed UKIALUCP. **Exhibit 5** also indicates where the proposed UKIALUCP intensity criteria are less stringent than the current MCACLUP (e.g., portions of Zones 2, 3, 4, 5, and 6).

Under the current MCACLUP, for example, the intensity limit within portions of Zone A* located off-airport allows an average of 10.0 people per acre. Under the proposed UKIALUCP, where Zone A* falls within Zone 1, all nonresidential development would be prohibited, and only structures and facilities required for aeronautical purposes would be allowed. Most of Zone 1 falls within the airport property boundary; therefore, no conflict would result. However, two City zoning classifications fall within the outer portions of Zone 1 that are not owned by the Airport: Manufacturing and Community Commercial. These affected properties would be precluded from erecting nonaeronautical structures or permitting outdoor activities allowing assemblages of people. Although displacement of nonresidential development could occur in Zone 1, as well as in portions of Zones 2, 3, and 6, these uses could be accommodated elsewhere within the proposed Airport Influence Area provided that these uses can satisfy the relaxed intensity criteria provided in the proposed UKIALUCP. For this reason, the potential displacement of nonresidential uses is deemed to be less than significant.

Although relaxation of the proposed UKIALUCP intensity criteria within certain compatibility zones would result in less conflicts between local general plans and the proposed UKIALUCP, this circumstance also has the potential to induce growth within those portions of the proposed Airport Influence Area as it would relax the intensity criteria of the County’s and City’s airport-related overlay zoning districts. Nevertheless, this growth-inducing potential under the proposed UKIALUCP would not increase levels of development above those projected within the County’s and City’s respective general plans. As a result, this circumstance is deemed to be less than significant.

Exhibits 7A through 7D identify the seven parcels that fall within the newly proposed Zone 1* of the revised UKIALUCP (Final Draft April 2021): 5 parcels in the City of Ukiah (North) and 2 parcels in unincorporated Mendocino County (South). Five parcels are developed and two are vacant. Under the draft UKIALUCP (Public Draft July 2020), portions of these parcels could be developed under Zone 2 criteria. Under the revised UKIALUCP (Final Draft January 2021), some or all the Zone 2 development potential is removed as these areas would become part of the more restrictive Compatibility Zone 1*. Although these parcels have reduced development potential under the Final Draft 2021 UKIALUCP compared to the Public Draft 2020 UKIALUCP, the redevelopment potential within the remaining areas that will now be in Compatibility Zone 2 is still greater than that provided under Zone A* of the currently in effect 1996 MACLUP. Lastly, since land use restrictions are identical between 1996 MACLUP Zone A* and Final Draft 2021 UKIALUCP Zone 1*, no theoretical displacement would occur. Therefore, the impact to parcels underlying Zone 1* is deemed to be less than significant.

Residential Land Use Conflicts

To identify potential conflicts with the proposed UKIALUCP, the proposed Compatibility Zones were overlaid onto the general plan land use maps for the County of Mendocino (**Exhibit 6**) and the City of Ukiah (**Exhibit 4**). The compatibility zones that could potentially prohibit or restrict future residential densities (dwelling units per acre) were compared to the allowable densities provided in the local agencies' zoning classifications. A conflict would arise if the general plan residential densities exceed the proposed UKIALUCP density criteria. Resolving these land use conflicts can necessitate changes to future land use development patterns by shifting or "displacing" the location of that development to less restrictive areas of the proposed Airport Influence Area or to other parts of the community where there are no proposed UKIALUCP restrictions. Displacement involves changes to the patterns of land use development that has not yet occurred. The proposed UKIALUCP has no effect on existing land uses; therefore, no displacement of existing development would occur as a result of adoption of the proposed UKIALUCP.

Exhibit 4 identifies the compatibility zones wherein the proposed UKIALUCP establishes more stringent density restrictions on residential uses compared to the current MACLUP (e.g., portions of Zones 2, 3, and 4). **Exhibits 8a** and **8b** in Section 14, *Population and Housing*, identify the zoning classifications permitting residential uses. The analysis compares the residential densities (dwelling units per acre) permitted under local zoning classifications with the density limits established in the proposed UKIALUCP. Where the densities of the zoning classification exceeds the proposed UKIALUCP density criteria (i.e., allow more future residential units than would be permitted under the proposed UKIALUCP), the number of housing units that could not be accommodated within portions of the proposed Airport Influence Area (i.e., displaced) is quantified. A positive number represents the theoretic displacement of housing units and a conflict between local land use plans and the proposed UKIALUCP. A negative number indicates that the proposed UKIALUCP applies less stringent restrictions on residential densities than County and City zoning and indicates no conflicts between these plans.

As indicated in **Exhibits 8a** and **8b**, certain zoning classifications conflict with several of the proposed UKIALUCP density criteria resulting in a potential displacement of future housing units. However, as indicated in Section 14, *Population and Housing*, the theoretic displacement of future housing is anticipated to be less than significant as areas inside and outside of the proposed Airport Influence Area are anticipated to be able to accommodate the

theoretic displacement. As such, this theoretic displacement potential would not affect the County's or City's ability to fulfill its obligations associated with the Regional Housing Needs Allocation numbers established by the California Department of Housing and Community Development.

For the areas where the proposed UKIALUCP would relax the density criteria, there could be the potential for the proposed UKIALUCP to induce growth within certain portions of the proposed Airport Influence Area as it would relax the density criteria of the County's and City's airport-related overlay zoning district. However, this growth-inducing potential under the proposed UKIALUCP would not increase levels of development above those projected within the general plans adopted by the affected local agencies. Additionally, the airport-related overlay zoning districts, once amended to be consistent with the proposed UKIALUCP, are anticipated to remove all potential conflicts between the primary zoning district (or general plan land use designation) and the proposed UKIALUCP. Therefore, no changes to the general plan land use maps are required.

Mitigation

None Required.

12. Mineral Resources

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - b): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and City of Ukiah General Plan designates lands rich in mineral resources that are of regional and statewide significance. No “Mineral Resource Zones” are located within the proposed Airport Influence Area. Additionally, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to mineral resources.

Mitigation

None required.

13. Noise

Would the proposed project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a – e): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed Airport Influence Area has the potential to contain a wide variety of noise sensitive receptors, both known and unknown. However, the proposed UKIALUCP is regulatory in nature; it does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in exposing persons to noise or generating noise.

Pursuant to the State Aeronautics Act, the purpose of the ALUCP is to minimize the public’s exposure to aircraft noise within the Airport vicinity. Therefore, adoption and implementation of the proposed UKIALUCP would not generate new sources of aviation-related noise or expose people residing and working in the vicinity of the Airport to excessive noise.

Airport-related noise and its impacts on land uses were considered in the development of the proposed UKIALUCP. The 1996 Airport Master Plan’s forecast projected some 57,000 annual operations. The forecast of 30,916 annual

operations, developed for the purposes of the proposed UKIALUCP, is based on the current annual operations of 15,458 according to the FAA 5010 Airport Master Record. Of the 15,458 annual operations, approximately 887 are CalFire operations. Currently, there are an average of 42 operations daily. The forecast noise contours are described in terms of the Community Noise Equivalent Level (CNEL), the metric adopted by the State of California for land use planning purposes. In accordance with PUC Section 21675(a), the Airport forecast noise contours cover the requisite 20-year planning timeframe and represent 30,916 future annual aircraft operations. The ALUCP does not regulate the operation of aircraft or the noise produced by that activity. State law (PUC Section 21674(e)) explicitly denies the ALUC authority over such matters.

The Airport noise contours are one of four compatibility factors used to establish the compatibility zones for the proposed UKIALUCP. The ALUCP establishes criteria that reduce the potential exposure of people to excessive aircraft-related noise by limiting residential densities (dwelling units per acre), establishing interior noise level limits, and restricting other noise-sensitive land uses in locations exposed to noise levels in excess of 60 dB CNEL. Thus, adoption of the proposed UKIALUCP would not expose people residing or working in the area to excessive noise levels.

Mitigation

None required.

14. Population and Housing

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) As noted in Section 11, *Land Use and Planning*, the proposed UKIALUCP includes less stringent intensity and density criteria in one or more compatibility zones. Although relaxing the proposed UKIALUCP criteria could potentially induce population growth within certain portions of the Airport Influence Area, the proposed UKIALUCP would not increase levels of development above those projected within the general plans adopted by the affected local agencies. The environmental effects of development proposed in the adopted general plans have already been adequately analyzed in previously certified environmental documentation and policies and/or mitigation measures have been adopted that would reduce those environmental effects. Additionally, any future development proposals or general plan/zoning amendments would be subject to CEQA, ensuring that potential impacts are studied, disclosed, and mitigated as appropriate.

Potential Displacement of Future Housing

Jurisdictions are mandated by state law to accommodate their share of the regional housing needs (Government Code Section 65580). State law also requires jurisdictions to amend their respective general plans to be consistent with the ALUCP or to take special steps to overrule the ALUC (Public Utilities Code Section 21676(a)). Modifying a general plan for consistency with the ALUCP has the potential to restrict a jurisdiction's ability to satisfy its share of the regional housing needs, as an ALUCP may preclude or limit the future development of housing units within portions of the Airport Influence Area.

Impact Analysis

To address potential impacts to the County's and City's future housing resources, an analysis was conducted to determine the amount of developable residential acreage and the number of future dwelling units that could be potentially precluded from portions of the Airport Influence Area. The analysis compares the residential densities (dwelling units per acre) permitted under local general plans with the density limits established in the proposed

UKIALUCP. Where the general plan densities exceed the proposed UKIALUCP density criteria (i.e., allow more future residential units than would be permitted under the proposed UKIALUCP), the number of housing units that could not be accommodated within portions of the Airport Influence Area (i.e., displaced) is quantified.

As noted in Section 11, *Land Use and Planning* (see page 26), several planned residential land use designations associated with the County's and City's respective general plans are potentially impacted by the proposed UKIALUCP. The purpose of this analysis is to determine whether the proposed UKIALUCP could impact the ability of the County of Mendocino or City of Ukiah in meeting its respective share of the Regional Housing Need Allocation (RHNA) as established by the California Department of Housing and Community Development (HCD).

The displacement analysis is summarized in **Exhibits 8a and 8b**. The analysis is done on a community-wide (zone-by-zone) basis and does not reflect where an individual parcel may lose its development potential or where another parcel may gain a density increase (parcel-by-parcel assessment).

The displacement analysis considers three project alternatives:

- **Proposed Project** – Adoption of the proposed UKIALUCP, which includes the Urban Overlay in Zones 3 and 4 (north) in the City of Ukiah and Zone 3 (southwest) in unincorporated Mendocino County.
- **Project Alternative** – Adoption of the proposed UKIALUCP without the Urban Overlay Zone.
- **No Project Alternative** – No adoption of the proposed UKIALUCP and continuance of the current MCACLUP.

The analysis begins with identifying zoning designations allowing residential uses within the proposed UKIALUCP Compatibility Zones. Based on the number of acres of each land use type found within the proposed Compatibility Zone, the allowable density is calculated to determine the total number of dwelling units allowed under the following plans:

- County's and City's zoning classifications,
- Proposed Project (UKIALUCP with Urban Overlay),
- Project Alternative (no Urban Overlay), and
- No Project Alternative (continuation of current MCACLUP).

The potential displacement is calculated by comparing the allowable density under the three project scenarios with the allowable density provided by the County and City zoning classifications. In **Exhibits 8a and 8b**, a positive number represents the theoretic displacement of housing units; a negative number indicates that the proposed UKIALUCP applies less stringent restrictions on residential densities than County and City zoning. If the proposed Project results in a theoretic displacement, the number is compared with the No Project Alternative to determine if the proposed UKIALUCP is more stringent than the current MCACLUP that currently guides land use development decision within the airport environs. The results documented in **Exhibits 8a and 8b** indicate the following:

- In most instances, the proposed Project does not result in residential displacement.
- The proposed Project is the least restrictive on residential development compared to the Project Alternative (no Urban Overlay Zone) and No Project Alternative (current MCACLUP).
- Potential displacement is concentrated in:

- Zone 2 (south) in unincorporated Mendocino County and accounts for a theoretic displacement of 41 units; and
- Zones 2 and 3 (north) in the City of Ukiah accounts for a theoretic displacement of 170 units.

The County's and City's ability to meet its respective RHNA is described below.

County of Mendocino

The County of Mendocino's current Housing Element (2019-2027) was adopted August 2018. The adopted Housing Element indicates that the County's Regional Housing Need Allocation (RHNA) is 1,845 units by 2027. The adopted Housing Element indicates that the current number of Occupied Household Units is 34,870 and the Projected Household Units is 36,715 by 2027 (an increase of 1,845 units). As stated in the adopted Housing Element, there is a significant amount of vacant land given the rural nature of Mendocino County. However, substantial proportions of vacant or underutilized lands surrounding the City of Ukiah, which are deemed most conducive for higher density residential development, are located either in a flood zone, airport zone, or situated near a fault zone.

Based on the displacement calculations summarized in **Exhibit 8a**, the theoretic displacement of up to 41 units represents a less than significant amount for the following reasons:

- Under the County's General Plan, a total of 1,229 units (existing and future) can be accommodated within the unincorporated portions of the proposed Airport Influence Area. Although residential development exists, undeveloped areas remain available for future residential housing and could accommodate the theoretic displacement of 41 units.
- Under the proposed UKIALUCP, a total of 4,667 total units (existing and future) could be allowed within certain areas of the proposed Airport Influence Area. If prudent, there could be opportunities for the County to change local zoning to allow increased residential development in certain areas of the proposed Airport Influence Area to accommodate additional residential development.

For these reasons, unincorporated areas of the County, both inside and outside of the proposed Airport Influence Area, are anticipated to be able to accommodate the theoretic displacement of up to 41 units. As such, this theoretic displacement potential would not affect the County's ability to fulfill its obligations associated with the RHNA.

City of Ukiah

The City of Ukiah's current Housing Element (2019-2027) was adopted October 2019 and certified by HCD in December 2019. The adopted Housing Element indicates that the City's RHNA is 239 units within the 2019-2027 planning cycle. The adopted Housing Element indicates current Household Units is 6,572 (2018) and also indicates the Projected Household Units is 6,811, reflecting an increase of 239 units. The adopted Housing Element also indicates that the City has 161 vacant units suitable for low-income and very low-income groups and 165 vacant units suitable for moderate and above moderate-income groups (326 total units). The theoretic displacement of up to 170 units can be accommodated by the City's available vacant housing stock.

Also, as indicated in **Exhibit 8b**, the General Plan allows a total of 16,442 units (existing and future) within the incorporated areas of the proposed Airport Influence Area. The current housing stock represents only 40 percent of

this total residential development potential (6,572 units / 16,442 units). Additionally, under the proposed UKIALUCP, a total of 14,415 units (existing and future) could be allowed within certain areas of the proposed Airport Influence Area and could accommodate the theoretic displacement of 170 units.

Therefore, the theoretic displacement of 170 units, which represents about 1 percent of the total residential development potential in the City (170 units / 16,442 units), is deemed to be less than significant because it would not affect the City's ability to fulfill its obligations associated with the RHNA and because the displaced housing units could be accommodated in other incorporated areas inside or outside the proposed Airport Influence Area.

Mitigation

None required.

15. Public Services

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a.i – a.iv): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed Airport Influence Area contains and has the potential to contain a wide variety of public services in the future. The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to listed government facilities or services.

a.v): Adoption and implementation of the proposed UKIALUCP would create a temporary increase in the staff workloads as a result of the state requirement to modify the local general plan to be consistent with the proposed UKIALUCP. As described in Section 10 of this Initial Study, minor changes and/or additions would be needed to bring the local general plans and Airport-related overlay zoning ordinances into consistency with the proposed UKIALUCP. Over the long-term, procedural policies included in the proposed UKIALUCP will simplify and clarify the ALUC project review process, thereby reducing the workload for ALUC staff and planning staffs of the County of Mendocino and the City of Ukiah.

Mitigation

None required.

16. Recreation

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - b): See Summary of Potential Environmental Effects (No. 11 on page 7). A wide range of recreational facilities are found in Mendocino County. Therefore, the proposed Airport Influence Area has the potential to contain a wide variety of recreational resources, both known and unknown. The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to recreation.

Mitigation

None required.

17. Transportation and Traffic

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a – d): See Summary of Potential Environmental Effects (No. 11 on page 7). The Mendocino County General Plan and City of Ukiah General Plan identify a wide range of existing and planned transportation modes, including roads, transit, non-motorized transportation, rail, and aviation.. On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. These changes included elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. Amendments and additions to the CEQA Guidelines eliminated auto delay for CEQA purposes and identified vehicle miles traveled (VMT) as the preferred CEQA transportation metric. SB 743 became effective on July 1, 2020. Prior to that date, the SB 743 Vehicle Miles Traveled (VMT) Regional Baseline Study was accepted by the Mendocino Council of Governments at their regular meeting on June 1, 2020. This study recommends VMT methods and thresholds for lead agencies in Mendocino County, as well as transportation demand management (TDM) strategies for reducing VMT on projects. It should be noted that adoption and implementation of the proposed UKIALUCP will not result in any substantial change to VMT within the Airport Influence Areas, as the project is a regulatory tool to ensure development is compatible with existing and proposed airport uses. Therefore, the proposed Airport Influence Area contains and has the potential to contain a wide variety of transportation systems in the future. However, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to on-ground transportation and traffic

c): Neither the ALUC nor the policies set forth in the proposed UKIALUCP have authority over Airport operations (PUC Section 21674(e)). However, in accordance with state law (PUC Section 21676), certain off-Airport development proposals that could have Airport compatibility implications are subject to ALUC review. Nonetheless, adoption and implementation of the proposed UKIALUCP will not result in any change to air traffic patterns at Ukiah Municipal Airport.

Mitigation

None required.

18. Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and this is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In apply the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a – b): See Summary of Potential Environmental Effects (No. 11 on page 7). A Tribal Cultural Resource is a site feature, place, cultural landscape, sacred place, or object that is of cultural value to a Tribe. The Mendocino County General Plan and City of Ukiah General Plan indicate that no tribal lands exist within vicinity of the Ukiah Municipal Airport. However, the proposed Airport Influence Area has the potential to contain a wide variety of tribal cultural resources, both known and unknown. Nevertheless, the proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to tribal cultural resources.

Mitigation

None required.

19. Utilities and Service Systems

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage; electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a – g): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed Airport Influence Area contains and has the potential to contain a wide variety of utilities and service systems in the future. The proposed UKIALUCP is regulatory in nature. It does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in any impacts to utilities and service systems.

Mitigation

None required.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - d): See Summary of Potential Environmental Effects (No. 11 on page 7). Within the proposed AIA, the fire hazard severity zones include moderate, high, and very high severities. The proposed UKIALUCP is regulatory in nature; it does not propose any new development, construction, or physical change to the environment that would directly or indirectly impair an adopted emergency response or evacuation plan, exacerbate wildfire risks, or expose people or structures to significant risks.

Mitigation

None required.

21. Mandatory Findings of Significance

Would the proposed project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a - c): See Summary of Potential Environmental Effects (No. 11 on page 7). The proposed Airport Influence Area has the potential to contain a wide variety of environmental resources, both known and unknown. The proposed UKIALUCP is regulatory in nature; it does not propose any new development, construction, or physical change to the environment that would directly or indirectly result in a substantial adverse effect on the environment or human beings or substantially degrade the environment.

As indicated in the analysis provided for Environmental Category 14, *Population and Housing*, adoption of the proposed UKIALUCP has the potential to displace future residential and nonresidential development to other areas within the community. Although the proposed UKIALUCP has the potential to induce growth within portions of the Airport Influence Area, the increased levels of development would not exceed those projected within the general plans adopted by the affected local agencies. As discussed under Environmental Category 15, *Public Services*, some staff effort would be required to revise the local jurisdictions’ general plans and/or implementing ordinances. However, this effort would be temporary and result in a simplified review process following the proposed UKIALUCP adoption. Therefore, adoption and implementation of the proposed UKIALUCP has no potential to create cumulatively significant environmental impacts.

Mitigation

None required.