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Planning Services Division  
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Ukiah, CA 95482  
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**DATE:** June 21, 2018  
**TO:** Mendocino County Airport Land Use Commission  
**FROM:** Craig Schlatter, Community Development Director  
**SUBJECT:** Mendocino County Comprehensive Land Use Plan Consistency Determination for Garton Tractor – for the Commission’s August 2, 2018 meeting

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### PROJECT OVERVIEW

**OWNERS:** Pauline Ruddick  
2201 Ruddick Cunningham Rd.  
Ukiah CA 95482

**APPLICANT:** Garton Tractor  
285 Talmage Rd.  
Ukiah CA 95482

**AGENT:** L.S. Mitchell Architect, Inc.  
135 W Gobbi St., Suite 203  
Ukiah, CA 95482

**REQUEST:** Mendocino County Comprehensive Land Use Plan  
Consistency Determination for Garton Tractor

**LOCATION:** ±800 ft east of the intersection of Talmage Road and South  
State Street, lying on the south side of Talmage Road.  
Address: APN: 003-230-34.

**TOTAL ACREAGE:** ±2.36 A

**GENERAL PLAN:** Industrial (I)

**ZONING DISTRICT:** Manufacturing (M)

**ENVIRONMENTAL  
DETERMINATION:** Exempt, pursuant to CEQA Guidelines §15303(c), Class 3,  
New Construction or Conversion of Small Structures

## **SUMMARY**

Garton Tractor, an agricultural implement sales, service, and repair business located at 285 Talmage Road, proposes to construct a new  $\pm 5,770$  sf metal building for the servicing of equipment. The new building will comprise 5 service bays to support tractor finish assembly, service and repair, and detailing. Two shipping containers and an existing  $\pm 800$  sf metal building will be removed. No new landscaping is proposed by the project, nor additional parking. No additional signage is proposed as part of this development.

## **PURPOSE OF AGENDA ITEM**

The purpose of this agenda item is to request the Mendocino County Airport Land Use Commission (the "Commission" or the "ALUC") review the Garton Tractor new building construction project (the "Project") proposal and determine its consistency with the Mendocino County Airport Comprehensive Land Use Plan ("CLUP"). According to Section 1.3.4(e) of the CLUP, any proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities will refer individual actions/projects located in the A and B zones to the ALUC. The Ukiah City Council in its June 6, 2018 meeting determined the Project should be referred to the ALUC. Per this direction, City staff is requesting a consistency determination for the proposed Project from the Commission.

## **PROJECT LOCATION AND SETTING**

The subject property is on the south side of Talmage Road,  $800\pm$  ft east of its intersection with South State Street. The site comprises  $2.36\pm$  acres. A flag lot, the property also connects to and is visible from Hastings Avenue / Airport Road to the south, although access to Hastings Ave. is gated and used intermittently by Garton Tractor staff. Including the proposed structure, total lot coverage by structures is  $\pm 13\%$ . Parking and warehouse lots account for an additional  $\pm 87\%$  of lot coverage.

Current development on the subject property was constructed in 1987 and 1990, as allowed by Use Permit 87-70 for the construction of a 4,500 sf main structure for use as a tractor and implement dealership. Site Development Permit 90-34 allowed for a 1,400 sf addition to the aforementioned structure.

*Figure 1. Aerial View*



## **CITY OF UKIAH ZONING ORDINANCE**

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The City of Ukiah Zoning Ordinance regulates development and use of the subject property with specific development standards. The zoning of the subject property is Manufacturing (M). The current use was permitted under Use Permit 87-70, and the proposed development meets the criteria of the M zoning district. The General Plan Land Use designation of the subject property is Industrial (I). Industrial areas are intended to support manufacturing and major employment centers, and where public facilities and services exist.

Figure 2. General Plan Land Use Category

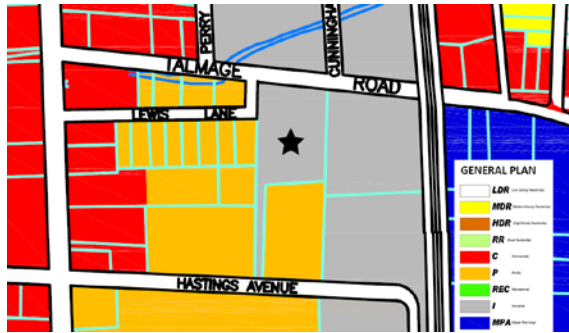
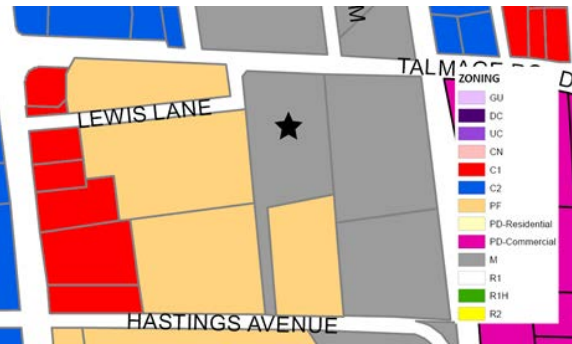


Figure 3. Zoning Designation



The following land use designations, zoning designations, and uses currently surround the subject property. The Ukiah Municipal Airport is located to the south and west, Mendocino County Farm Supply is located to the east, with a small engine repair and junk yard to the north. Adjoining parcels to the west are in Zone A of the July 1996 Ukiah Municipal Airport Master Plan Compatibility Zoning Map.

	ZONE:	GENERAL PLAN:	USE:
NORTH	Manufacturing (M)	Industrial (I)	Retail / Storage
EAST	Manufacturing (M)	Industrial (I)	Retail
SOUTH	Public Facility (PF)	Public (P)	Storage / Airport
WEST	Public Facility (PF)	Public (P)	Vacant

**Parking.** The project does not propose any changes to the current parking lot configuration, nor does the proposed project trigger an increase in required parking. However, the project does propose that 16 existing parking spaces be used for inventory storage. In order to assess the minimum number of parking spaces required for staff and customers, the following criteria from the Ukiah Municipal Code (UMC) Off-Street Parking and Loading Chapter were used. UMC §9198(G)(1) states:

*“Industrial Uses Of All Types Except A Building Used Exclusively For Warehouse Purposes: One parking space for each employee on the maximum shift, plus required space for any office area [see §9198(B)(1) below], plus a minimum of two (2) spaces for customer parking plus one space for each vehicle operated from or on the site. In no case shall the number of on-site parking spaces be less than subsection G2 of this section.”*

Ukiah City Code §9198(B)(1) states:

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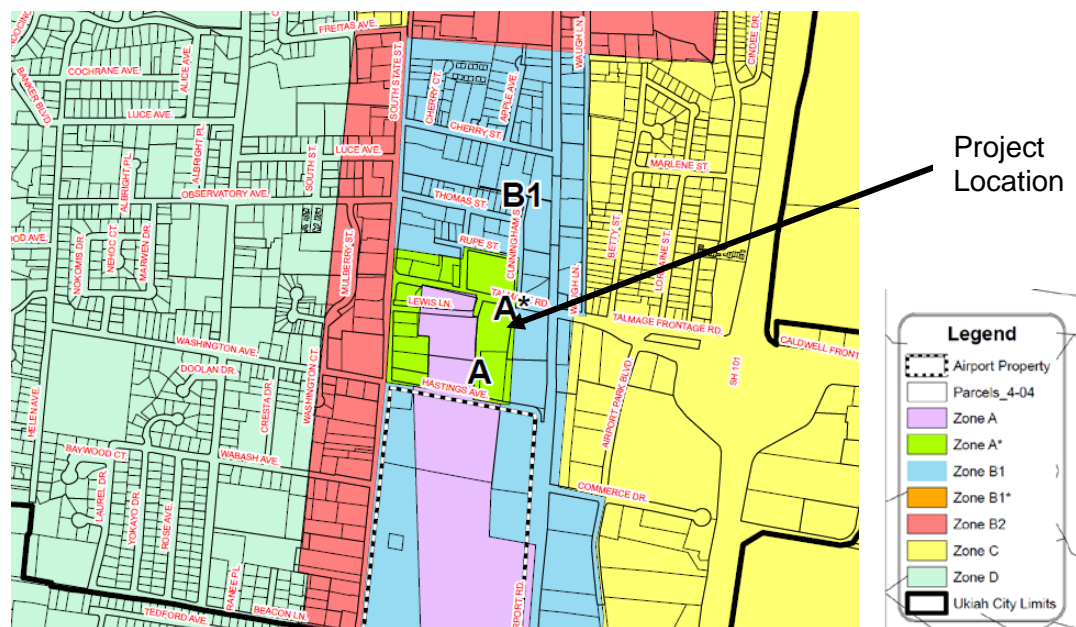
*“Retail Stores, Offices, Commercial Banks, Savings And Loan Offices, Food Stores, Drugstores, Appliance Repair Shops, And Similar Uses: One parking space for each two hundred fifty (250) square feet of gross leasable space except within the city of Ukiah parking district no. 1 boundaries where the requirement is one parking space for each three hundred fifty (350) square feet of net leasable space...”*

The total site comprises ±1,100 sf of office space, and 14 employees. Therefore a minimum of 21 parking spaces is required. The project designed demonstrates the ability of the property to provide 21 parking spaces for employees, customers, and vehicles operated from or on the site. These 21 spaces may not be used for inventory storage.

## MENDOCINO COUNTY AIRPORT COMPREHENSIVE LAND USE PLAN

Per the Ukiah Municipal Airport Master Plan (“Ukiah Master Plan”), the subject property is located in Airport Compatibility Zone “A\*”. No definition of the A\* Zone is present in the Ukiah Master Plan or CLUP, so City Staff sought a professional opinion from consultants Mead & Hunt. In a technical memorandum dated December 13, 2017 (Attachment 1), Mead & Hunt state “ALUCP Policy 6.1 recognizes the private ownership of land in Compatibility Zone A\*, by stating that ‘it is the intention of the City of Ukiah to provide long-term control of the land uses within these areas by either acquiring the property in fee or obtaining approach protection easements restricting the type and density of land uses permitted.’ Unfortunately, the ALUCP does not indicate what criteria should apply within Compatibility Zone A\* in the meantime, although presumably the criteria would be those of Zone A.”

Figure 4. Ukiah Municipal Airport Master Plan Compatibility Zoning Map July 1996



## Height Limits

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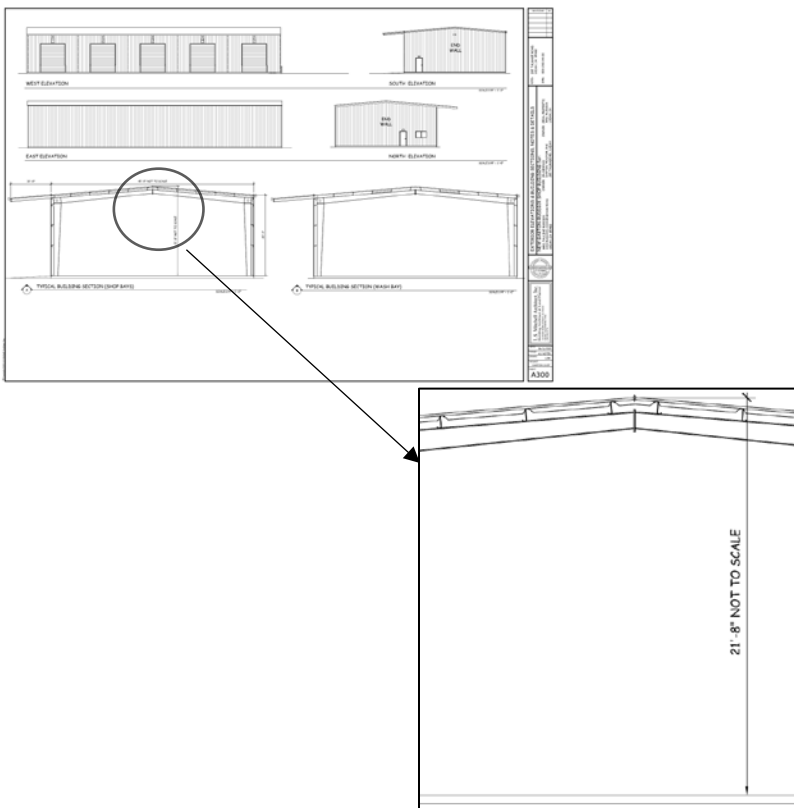
According to the 2011 CalTrans Division of Aeronautics Airport Land Use Planning Handbook, “the planned height of buildings, antennas, and other objects should be checked with respect to Federal Aviation Regulations Part 77 criteria if the development is close to the airport, situation with the runway approach corridors, or on land higher more than 150 feet above the airport elevation.”

Given the proposed Project’s proximity to the airport, as well as its location within Zone A\*, City Staff conducted a height analysis and sent a request for a determination of the potential of hazards to air navigation was to the Federal Aviation Administration.

The FAA issued its determination on April 12, 2018 (Attachment 2). The aeronautical study determined the proposed structure would not be a hazard to air navigation. The study also determined that marking and lighting are not necessary for aviation safety.

Height is limited by the Approach Surface, measured at a slope of 34:1 (see Ukiah Master Plan and aviation easement 704-06) and which commences ±1000 ft south of the proposed building site. Per the Approach Surface criteria, the maximum allowable building height at the southern end of the proposed building site is 29.4 ft. The maximum height of the proposed structure is 21 ft 8 in, and meets the Approach Surface criteria. All other development on the site exists north of the proposed structure and conforms to the Approach Surface height criteria.

*Figure 5. Elevations of Proposed Structure*



### Avigation Easement Dedication

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Per 3.3.2 of the CLUP, “the owner of any property proposed for development within Compatibility Zones A and B may be required to dedicate an aviation easement to the jurisdiction owning the airport.” Aviation Easement 704-06 was recorded on the subject property on April 21, 1988 (Attachment 3). The easement states “the said Northerly clear zone approach area shall remain free and clear of any structure, tree or other object which is or would constitute an obstruction or hazard to the flight of aircraft in landing and taking off at the said Ukiah Municipal Airport.” As stated above, the FAA determined the proposed structure posed no hazard to air navigation.

Because the structure does not pose a hazard to air navigation and will replace existing small structures, City staff believes the terms of the aviation easement will still be fulfilled with the construction of the proposed structure.

**Density.** Density in the Ukiah Airport Plan Compatibility “A” Zones, which includes both the Runway Protection Zone as Zone “A” and the “A\*” Zone, allows a maximum of 10 persons per acre. This figure should include all individuals who may be on the property, such as customers and employees. Utilizing this density requirement, the ±2.3 acre site can accommodate 23 persons on site per the Ukiah Municipal Airport Plan criteria. The business employs 14 persons currently, which leaves room for 9 customers.

**Open Space.** Open land requirements are intended to be applied with respect to the entire zone, and per the Ukiah Master Plan, “All remaining [open land is] required” in Zone A. A large portion of Zone A is owned by the City of Ukiah and is designated as permanent open land. The Project will replace 3 existing small structures and is within the existing pattern and bounds of development. For these reasons Staff interpret the building to have a less than significant impact on the Zone A\* open space. The aggregate amount of open land remaining in Zone A\* meets the intent of the Ukiah Master Plan.

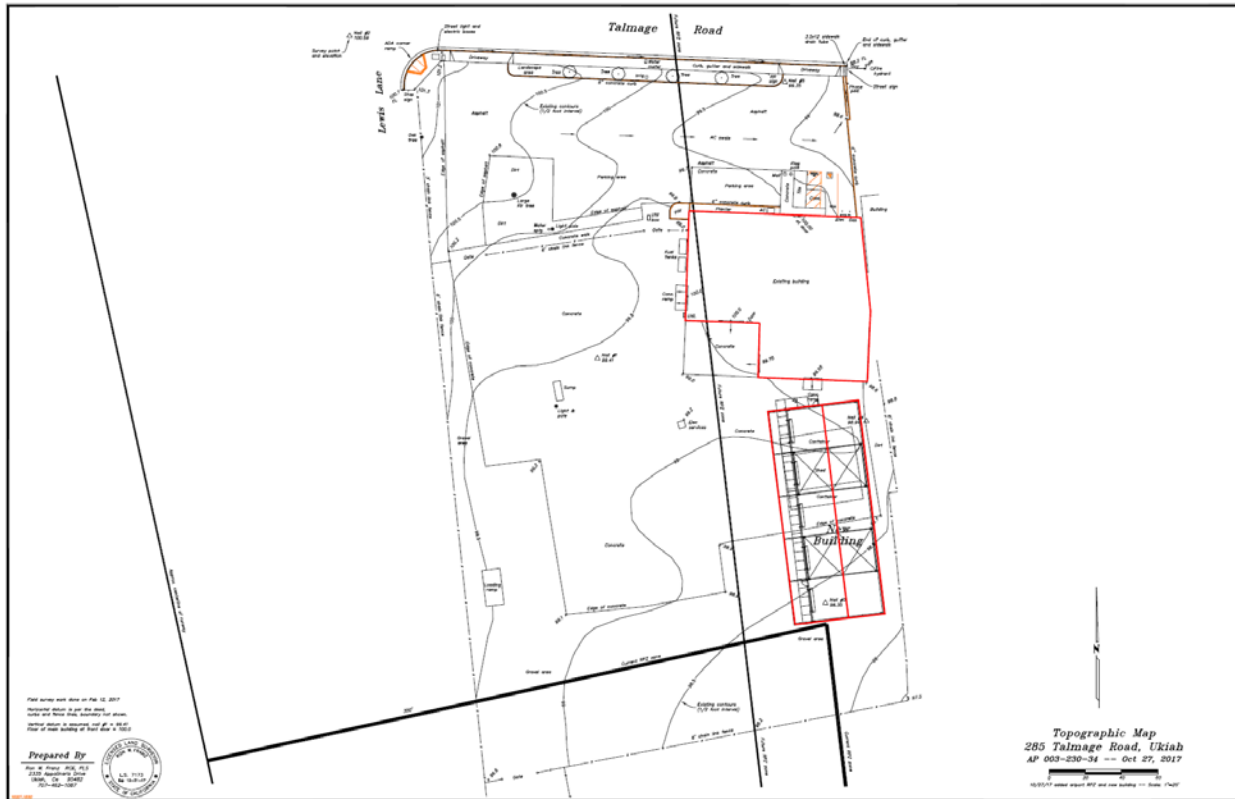
## **ANALYSIS**

The 2011 California Airport Land Use Planning Handbook recommends Airport Comprehensive Land Use Plans be reviewed and updated at least every 5 years. The existing Mendocino County CLUP does not appear to have been updated since it was first adopted in 1996, whereas the Airport Layout Plan of the Ukiah Municipal Airport was updated as recently as 2015. Per Mead & Hunt’s 12/13/17 memo, “The entire ALUCP really needs updating as it is over 20 years old and does not adhere to current Caltrans Airport Land Use Planning Handbook guidance or the procedures and criteria adopted by other ALUCs in recent years.”

Where this creates particular conflict is in analysis of the Runway Protection Zones as pertaining to this project. According to Table 7A of the CLUP (Table 2A of the Ukiah Master Plan), the A Zone denotes the *Runway Protection Zone or within Building Restriction Line*. However, the current RPZ of the Ukiah Municipal Airport- Airport Layout Plan (“ALP”) comprises an area different from Compatibility Zone A. Because the current RPZ was developed in accordance with FAA requirements and standards, and future funding of the Ukiah Municipal Airport is dependent on an RPZ in conformance with these standards, the RPZ of both the CLUP and the ALP should be identical. Per Mead & Hunt, “...the ALUCP should have been updated as necessary at the time the new ALP was approved by the City and the FAA.”

*Figure 6. The building as proposed is located entirely outside the RPZ of the ALP but within Compatibility Zone A of the CLUP and Ukiah Master Plan.*





Due to these conflicts, City Staff sought a professional opinion from Mead & Hunt regarding the Garton Tractor project. In a technical memorandum dated June 19, 2018 (Attachment 4) Mr. Ken Brody, Senior Airport Planner, concludes the project should be considered acceptable with regard to FAA and CalTrans Handbook standards. Mr. Brody also notes the CLUP is out of date and amending the plan to remove existing conflicts is a possibility, though may not be achievable in a timely manner [(for this project)].

City Staff also sought input on the Project from the City of Ukiah Airport Manager, Mr. Greg Owen, who provided comments that have been incorporated into this analysis.

## CONCLUSION

City Staff recommends the Commission take all factors stated above into their consideration of a consistency determination for the proposed Project.

Additionally, for future projects, City staff recommends the Commission follow Mead & Hunt's advice to either update the CLUP or, as stated in the 12/13/17 memo, "simply update the Ukiah Municipal Airport Compatibility Map found on page 3-15 of the ALUCP." Updating the compatibility zones to be reflective of the current Airport Layout Plan of the Ukiah Municipal Airport should correct these prevailing conflicts of consistency, until such time that a full update to the CLUP can be completed.