



**Technical Memorandum**

To: Craig Schlatter, Community Development Director  
City of Ukiah

From: Ken Brody, Senior Airport Planner

Date: June 19, 2018

Subject: Airport Compatibility of Garton Tractor Building Proposal Consistency

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As you have requested, this Technical Memorandum follows up on Mead & Hunt’s December 13, 2017, memo that addressed a variety of issues concerning the Garton Tractor Building Proposal and Mendocino County Airport Land Use Compatibility Plan (ALUCP) policies. Here we focus more specifically on the proposal’s compatibility with the Ukiah Municipal Airport using three sources as the analytical basis: policies and criteria set forth in the 1996 ALUCP adopted by the Mendocino County Airport Land Use Commission; Federal Aviation Administration (FAA) standards; and the Caltrans Division of Aeronautics 2011 California Airport Land Use Planning Handbook (Handbook). We have also considered that changes have been made to the proposed Garton Tractor site plan since our December 2017 memo was written.

Our understanding of the proposed project is that it will result in construction of a new 5,770-square-foot shop building that will replace an existing approximately 800-square-foot building and two shipping containers. A separate existing building will remain. Current use of the 2.3-acre site is low intensity and expected to remain so with the new construction.

*Mendocino County Airport Land Use Compatibility Plan*

Having been adopted more than 20 years ago, the 1996 ALUCP is antiquated in many respects. This is particularly true with respect to criteria and maps pertaining to Ukiah Municipal Airport in that the airport layout plan that the ALUCP uses as the basis for its mapping was updated and modified in 2016. The modifications include a proposed northerly extension of the runway and a corresponding shift in the location of the runway protection zone (RPZ). The size of the existing and future RPZs has also changed. These changes affect the Garton Tractor property.

The 1996 ALUCP encompassed the Runway 15 (north) RPZ within two zones: Compatibility Zones A and A\*. The Zone A boundary reflects the airport property line that existed at the time and has not changed since then. Zone A\* takes in private properties that fall at least partly within the remainder of the RPZ. The RPZ dimensions used were based on the FAA standards applicable to this runway end at the time. As the 2016 ALP shows, however, the currently applicable RPZ dimensions are smaller and fall mostly within Compatibility Zone A. The proposed runway extension, though, shifts the RPZ 465 feet northward, resulting in the bulk of the Garton Tractor property being within the future RPZ.

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Two conditions thus are worth examining. First, if the ALUC consistency determination relies upon the currently adopted ALUCP, all the Garton Tractor property would be within Compatibility Zone A\*. All of the property also would be within the RPZ established at that time. Alternatively, if the ALUC can take into account the current ALP despite not having updated its ALUCP to reflect this ALP, then the size of Compatibility Zone A\* conceivably could be reduced in a manner that would have less impact on the Garton Tractor property.<sup>a</sup> Importantly, the future building as now proposed in the amended site plan falls completely outside both the existing and future RPZs.

The ALUCP criteria for Compatibility Zone A, and presumably applicable to A\* as well, indicate that all new structures are prohibited. Further, occupancy of the property is limited to an average of no more than 10 people per acre. To comply with this latter criterion, usage of the 2.3-acre property will need to be limited to no more than 23 people. Given the nature of the current use, we understand that this criterion can be met with the new development. The major question thus becomes one of whether a new structure is allowable under the ALUCP policies.

### *Federal Aviation Administration Standards*

Another set of criteria important to this project is that of the FAA. ALUCP policies should, at a minimum, adhere to FAA criteria with respect to RPZs. The FAA strongly encourages airports to own the land within their RPZs or otherwise ensure that incompatible uses are avoided. Buildings are one such incompatible use. Mead & Hunt's December 2017 memo covered this topic in detail.

Now that the proposed building falls outside of both the existing and future RPZs, much of our earlier discussion no longer applies. Further, City staff requested the FAA to conduct an aeronautical study of the proposed building. As documented in its April 12, 2018, letter, the FAA concluded that the height of the building would not be a hazard to the airport's airspace.

Important to note regarding the FAA's analysis, however, is that it only looks at the building height and whether it would be an obstruction to the airport airspace. Even the matter of whether the building would be in the RPZ is not explicitly addressed. Other compatibility issues such as the intensity of the use and the non-building uses within the RPZ are also not addressed. These limitations notwithstanding, the FAA's determination can reasonably be relied up to conclude that the project will not conflict with the ALUCP's airspace protection policies.

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<sup>a</sup> Whether the ALUC can base a consistency determination on other than its adopted, although outdated, plan is a legal question regarding which the ALUC should consult its legal counsel.

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### *California Airport Land Use Planning Handbook*

Given the outdated status of the ALUCP, an examination of the proposed project with respect to criteria in the California Airport Land Use Planning Handbook is worthwhile. ALUCs are required to be guided by the Handbook when preparing compatibility plans for airports within their individual jurisdictions.

The Handbook defines a set of safety zones that should be established around airports. Two of these zones are of interest with respect to the Garton Tractor project. Safety Zone 1 corresponds to the FAA-delineated RPZs plus areas adjacent to runways. Safety Zone 2 is the Inner Approach/Departure Zone that extends beyond and along the edges of RPZs.

The Handbook criteria for Safety Zone 1 closely match the FAA's RPZ standards. All new structures should be prohibited and any other uses should be "very low intensity in character and confined to the outer sides." Even parking lots, a use that the Mendocino County ALUCP considers "normally acceptable" are to be avoided. The Handbook says that "avoid" should be interpreted as meaning that the "use generally should be permitted only if an alternative site outside the zone would not serve intended public function."

In suburban locations<sup>b</sup> such as Ukiah, Safety Zone 2 allows nonresidential intensities of 10 to 40 people per acre. This range is lower than the ALUCP Compatibility Zone B1 criterion of no more than 60 people per acre, but higher than the 10 people per acre limit in Compatibility Zone A\*.

Using Handbook criteria, the proposed Garton Tractor building would be situated in Safety Zone 2. Its type and intensity of use presumably would comply with the criteria for this zone. The portion of the property that falls within Safety Zone 1 is another matter. This area is used for parking of tractors and other storage. Even if the usage is equivalent to a parking lot, the Handbook suggests it should be avoided. This usage is already on-going, however, and as long as it doesn't change significantly after the new building is constructed, can be considered an existing use which state law exempts from Handbook restrictions.

### *Conclusions*

The project should be considered acceptable with regard to ALUCP airspace protection policies in that the FAA has determined it to be no hazard to air navigation. The amended site plan, which moves the proposed building location outside of both the existing and future RPZs, eliminates conflict with FAA standards for these areas. The remaining uses within the RPZs can be judged acceptable as long as they are primarily storage related.

Using the safety zone boundaries delineated in the Caltrans Handbook, the project also appears to comply with Handbook safety compatibility criteria. To ensure compliance, uses within the Safety Zone 1

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<sup>b</sup> "Areas characterized by low-rise (1-2 story) development and surface parking lots."

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(RPZ) part of the property would need to be limited to storage and other very-low-intensity activities similar to the current uses. Uses within the Safety Zone 2 area, including both the proposed and existing buildings, would need to be limited to a maximum of 40 people per acre. About one-third of the property (0.75± acres) is estimated to be in Zone 2, thus its total occupancy should be limited to a maximum of 30 people.

With regard to the 1996 ALUCP, the proposed project is not consistent. Amending the plan to remove the conflict is a possibility, though may not be achievable in a timely manner. To make a finding of consistency at the present time, the ALUC would need to take into account the potential zone boundary changes that could come from an ALUCP update and/or rely upon the FAA's airspace determination along with the applicable criteria from the Caltrans Handbook.