

March 18, 2026

Mendocino County Airport Land Use Commission

Re: Referral for Consistency Determination – City of Ukiah Downtown Zoning Code Amendments and Comprehensive Rezoning

Dear Commissioners and Staff:

UKIALUCP Requirements – Mandatory Referral for General Plan Amendments

The Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP) requires the City of Ukiah to refer certain land use actions to the Airport Land Use Commission (ALUC) for a consistency determination before they can be approved. Under Section 1.4.1(a) of the UKIALUCP, this includes any new general plan amendment affecting lands within the Airport Influence Area. In these cases, the Local Agency must refer the action to the ALUC for a consistency determination prior to adoption or approval.

Because the Project includes a General Plan Amendment and rezoning affecting lands within the UKI Airport Influence Area, the City of Ukiah needs to refer the amendment to the ALUC before it moves forward to the Planning Commission and City Council for review and potential adoption.

Project Description

The proposed Project involves a comprehensive land use amendment and rezoning of parcels within and adjacent to the existing Downtown Zoning Code boundary in the City of Ukiah. The project goal is to align zoning regulations with existing land uses and lot dimensions, the Ukiah 2040 General Plan, and the most appropriate development framework based on parcel size, frontage, and adjacent street network.

Specifically, the Project proposes to:

- Rezone and amend parcels currently designated Urban Center (UC) and General Urban (GU) to Community Commercial (C-1), to address the misalignment of the DZC form-based codes on larger lots along the East Perkins Street corridor and surrounding downtown blocks.
- Rezone and amend portions of the Urban Center (UC) district to Public Facilities (PF), consistent with civic uses that are planned or under construction, including the proposed Mendocino County Superior Courthouse and related facility parking.
- Rezone and amend portions of the Urban Center (UC) district, as well as a Heavy Commercial (C-2) parcel, to Recreation/Public Facilities (REC/PF), consistent with the "Recreational" (REC) General Plan designation.
 - This affects the Great Redwood Trail alignment and existing Ukiah Rail Depot structure, reflecting their planned recreational functions.

- Rezone and amend two parcels on Mason Street from Urban Center (UC) to Heavy Commercial (C-2), reflecting the existing mix of warehouse and commercial uses on those parcels.
- Refine the DZC boundaries to focus form-based code application on the Downtown Core, expanding the Downtown Core land use to the west and south where it aligns with the traditional block grid. This includes adjusting parcels along the Oak Street and Seminary Avenue corridors to General Urban (GU) to better reflect existing development patterns and cross-street boundaries.

The primary purpose of this Project is to implement the 2040 General Plan’s intent to resolve the mismatch between the form-based standards of the DZC and the existing development patterns along Perkins Street and downtown, as well as to accurately categorize public and recreational lands. Notably, if rezoned to Community Commercial (C-1), the majority of parcels along the Perkins Street corridor would revert to their pre-2012 commercial zoning designations.

Airport Influence Area and Compatibility Analysis

The Project area is located approximately one mile north of the Ukiah Municipal Airport (UKI). Beginning in 2008, the DZC was proposed and evaluated against both the C (Common Traffic Pattern) and the B2 Infill Compatibility Zone (Extended Approach Departure Zone) identified in the Mendocino County Airports Land Use Comprehensive Land Use Plan. Subsequently, on March 22, 2012, the Mendocino County Airport Land Use Commission conducted a public hearing, considered information prepared by its staff, and after considerable discussion, determined that the Downtown Zoning Code was consistent with the Mendocino County Airports Comprehensive Land Use Plan. At the time, the Commission made this determination with the understanding that minor language would be added to tables indicating that future development in the project area would be subject to the regulations contained in the City's Airport Master Plan and the Mendocino County Airports Comprehensive Land Use Plan.

Since 2012, the City has adopted the Ukiah Municipal Airport Land Use Compatibility Plan (UKIALUCP), as well as further analyzed the Downtown Core as part of the 2040 Ukiah General Plan. As evaluated for the Project, portions of the Project area fall within Compatibility Zone 4 (Outer Approach/Departure Zone), Compatibility Zone 6 (Traffic Pattern Zone), and the Other Airport Environs (OAE) zone. Refer to the enclosed maps and parcel list for additional details.

At the programmatic level, no significant airport-related environmental impacts are identified as part of this Project. The Project does not approve specific structures, generate traffic to or from the airport, introduce wildlife attractants, or alter airspace in a manner that would constitute a significant effect.

Potential impacts associated with future development including noise compatibility, height/airspace obstruction, and land use intensity are deferred to site-specific CEQA review, consistent with the existing procedures for development within Ukiah.

The City has evaluated the Project for consistency with the UKIALUCP and offers the following observations:

Noise: Aircraft noise is a primary compatibility concern identified in the UKIALUCP. New projects within the UKI Airport Influence Area must evaluate compatibility with applicable noise contours, measured in Community Noise Equivalent Level (CNEL). Based on a review of the noise contour mapping presented in Chapter 4 of the UKIALUCP (Exhibit 4-3), none of the rezoned areas fall within the 60–65 dB CNEL contour zones that would trigger additional noise studies or mitigation requirements. Accordingly, no noise-related concerns are immediately anticipated, but project specific evaluation will still need to be considered on an individual basis. Where applicable, aviation easements or noise disclosure conditions may be required consistent with UKIALUCP policies.

Height and Airspace Obstruction: The proposed C-1 and C-2 zoning districts allow a maximum building height of 50 feet. This represents an increase over the current Downtown Zoning Code (DZC) standards, under which the General Urban (GU) designation allows a maximum of 2 stories (28 feet) and the Urban Center (UC) designation allows a maximum of 3 stories (42 feet). With an allowed height increase, future structures closer to FAA Part 77 airspace surfaces, particularly within Zone 4 and Zone 6 would need to be evaluated.

As a programmatic action, this Project does not approve specific structures, however, future development applications on rezoned parcels that fall within FAA-defined airspace surfaces will be required to obtain FAA aeronautical study review and potentially a *No Hazard to Air Navigation* determination prior to project approval, similar to other applications reviewed by the City since 2020. This requirement applies equally to construction equipment, cranes and other temporary vertical elements that could present hazards to flight.

Land Use Compatibility: The Project transitions a majority of parcels from the DZC's form-based standards to the C-1 (Community Commercial) and C-2 (Heavy Commercial) districts, and reclassifies public and recreational lands to PF (Public Facilities) and REC/PF (Recreation/Public Facilities)..

The C-1 and C-2 zoning districts introduce a number of standardized and objective development allowances not incorporated into the DZC, including Objective Design and Development Standards (ODDS) for new multi-family residential construction and additional allowances and provisions for Accessory Dwelling Units (ADUs). These updates have demonstrated effectiveness in similar corridors, including along East Gobbi Street. The primary commercial differences between the DZC and the C-1 zoning district are that Drive-through or drive-up – restaurant, as well as certain formula fast food considerations would be considered within the C-1, district but are explicitly restricted within the DZC.

The reclassification of parcels to PF is consistent with the construction Mendocino County Superior Courthouse and associated parking. The reclassification of the Great Redwood Trail alignment and Ukiah Rail Depot to REC/PF reflects planned recreational functions and is generally consistent with airport compatibility requirements. Recreational trail uses are low-intensity. The construction of Mendocino County Superior Courthouse, which commenced in 2025 and associated public parking was previously evaluated in 2012 via an Environmental Impact Report (EIR) and in a 2022 Addendum to the EIR.

The two Mason Street parcels rezoned from UC to C-2 reflect existing warehouse and commercial uses. Heavy commercial uses are generally airport-compatible land uses and are unlikely to present noise sensitivity or density concerns as it pertains to the airport.

Land Use Intensity and Density: A list of densities identified in the Ukiah 2040 General Plan Land Use Element Table 2-1 are included, below:

- Downtown Core (DC) - 28 - 40 du/ac
- Community Commercial (CC): 15 - 28 du/ac
- Public (PF) – N/A
- Recreational (REC) – N/A

The majority of parcels affected by the Project will see a reduction in their maximum allowed density, as they are being amended from a Downtown Core land use designation to a Community Commercial designation. Alternatively, those that are amended to a recreational or public facility designation that restrict residential land uses altogether.

Within Zone 4, however, 3 parcels would be amended to designations allowing higher residential density. They are listed:

- APN 002-272-16 — Seminary Avenue
- APN 002-272-15 — Seminary Avenue
- APN 002-272-02 — South State Street

Each of these parcels are currently developed with commercial and mixed-use structures and are not projected to be redeveloped at intensities exceeding applicable UKIALUCP thresholds. While amended, similar to other DZC parcels, they would be evaluated under the allowances of the UKIALUCP with regards to Density.

Based on the analysis above, Staff's preliminary assessment is that the Project is consistent with the UKIALUCP, subject to the conditions that future discretionary development within the Airport Influence Area continue to comply with applicable noise, height, density, and land use compatibility standards on a project-by-project basis.

UKIALUCP CONSISTENCY REVIEW: Pursuant to Policy 2.2.6 the ALUC has three action choices in considering a zoning ordinance for consistency with the UKIALUCP, as follows:

- a) Find the proposal consistent with the UKIALUCP.
- b) Find the proposal consistent with the UKIALUCP, subject to conditions and/or modifications that the ALUC may require.
- c) Find the ordinance inconsistent with the UKIALUCP.
 - In making a finding of inconsistency, the ALUC shall note the specific conflicts or shortcomings upon which its determination is based.

Requested Action: Adopt a resolution finding the Project consistent with the Ukiah Municipal Airport Land Use Compatibility Plan.

Next Steps: If deemed consistent, the City intends to move this request forward to the Planning Commission for further analysis and a recommendation to the City Council. Staff will conduct additional public outreach regarding the general plan amendment and rezone process for parcels subject to change. After finalizing the areas subject to the Downtown Zoning Code, Staff will update the DZC regulatory text to address adaptive reuse standards, regulatory consistency updates (e.g., Accessory Dwelling Units, Objective Design Standards), and improved procedural requirements to support new development. Site-specific plans for redevelopment or reuse will be pursued separately as funding becomes available, including for the former County Courthouse site (APN 002-255-03).

Based on the above analysis, the City of Ukiah respectfully requests that the Mendocino County Airport Land Use Commission find the proposed Downtown Zoning Code amendments and rezoning consistent with the UKIALUCP. Relevant project materials, including the draft Findings of Significance, zoning and airport compatibility maps, and parcel lists, are enclosed for the Commission's review.

Please contact the City of Ukiah Community Planning Division Staff with any questions or to request additional information.

Best Regards,

Jesse Davis

Enclosures:

- Application Materials – Planning Application (1)
- Proposed List of Parcels (2)
- Associated Maps and Visuals (3)
- Ukiah City Code & 2040 General Plan Documents (4)

- §9004 Zoning in Conformance with Ukiah Municipal Airport Land Use Compatibility Plan
- Article 7. Regulations In Community Commercial (C-1) Districts
- Article 8. Regulations In Heavy Commercial (C-2) Districts
- Article 18. Downtown Zoning Code
- Ukiah 2040 General Plan Land Use Element
- 2008 Ukiah Proposed DZC – Mead & Hunt Review Memorandum (5)