

**Sacramento International Airport (SMF)
Airport Land Use Compatibility Plan (ALUCP)**

APPROVED UPDATE OF SMF ALUCP

(December 12, 2013)

What does this FAQ address?

This document provides a recap of the update of the Airport Land Use Compatibility Plan (ALUCP or the Plan) for Sacramento International Airport (SMF) that was approved by the SACOG Board of Directors on December 12, 2013. This document summarizes the key issues in the approved update. The FAQ is divided into three main sections:

1. **BASICS:** Basics of the Airport Land Use Commission - Why did SACOG Board of Directors approve an update to this plan?
2. **CONTENT:** What does the newly approved ALUCP cover and why is this important to local governments?
3. **REVISIONS:** What were the biggest concerns in the public comments before it was approved, and how was the plan revised to address them before it was approved?

Section I: ALUC BASICS

1. What role does SACOG have as the Airport Land Use Commission?

The California Aeronautics Act (Public Utilities Code sections 21670 et seq.) requires establishment of an ALUC in every county in the state and identifies the role and responsibilities of the ALUCs in land use planning. The SACOG Board of Directors serves as the ALUC for four of the six SACOG counties – Sacramento, Sutter, Yuba and Yolo. Placer and El Dorado counties each have their own ALUCs. The Act's ALUC requirements are intended to ensure that proposed land uses near airports are compatible with airport uses in terms of safety, noise and airspace. A compatibility plan is required for each public use and military airport in the state.

One of the primary functions of the ALUC for Sacramento, Sutter, Yolo, and Yuba counties is to develop and adopt a plan that establishes zones and associated compatibility criteria for safety, noise, and airspace protection for each airport under its jurisdiction. These plans are referred to as Airport Land Use Compatibility Plans (ALUCPs). These plans are not used for airport development. Rather, state law requires future land use development near airports to be consistent with compatibility criteria included in an ALUCP. Once an ALUCP is in place, each local jurisdiction submits affected land use development applications to the ALUC for review and response. The purpose of the ALUC review is to determine whether the proposed projects are compatible with the plan.

2. Why was the ALUCP Sacramento International Airport (SMF) updated?

There are a number of reasons why the SMF ALUCP was updated. First, the prior Comprehensive Land Use Plan (now called ALUCP) was last amended in 1994. Since that time, operations have changed, the airport has made several improvements, and traffic volume is higher. Meanwhile, urbanized land uses in the region have grown and are encroaching into the surrounding lands. Finally, the Caltrans Division of Aeronautics updated its guidelines for ALUCs and provided grant funds to SACOG within a limited timeframe to update the plan. Local matching funds from Sacramento County Airport System, the Sacramento County department that owns and operates the airport, is being used to supplement the state grant.

3. How was the ALUCP developed? What local governments were involved? How was the public involved?

The updated ALUCP was developed through SACOG and by working with many stakeholders, including the Sacramento County Airport System and several affected local government staffs. SACOG advertised for and selected a consultant, Mead and Hunt, to lead the preparation of the Plan. The basis of the Plan was the Statewide Airport Land Use Compatibility Handbook from Caltrans, which provides guidance and standards for all the ALUCPs in California.

The substantive ALUCP update process started in the summer of 2011. A technical advisory committee (TAC) was formed shortly afterwards to provide outside guidance and input on the components of the Plan. The TAC members were members of planning departments from the local governments within the influence area of the airport. Specifically, the following jurisdictions were represented: the cities of Davis, Roseville, Sacramento, West Sacramento, and Woodland, and the counties of Sacramento, Sutter, Placer and Yolo. Staff from the Caltrans Division of Aeronautics and the Sacramento County Airport System also served on the TAC. It met five times through March 2013 to review drafts and provide input on behalf of the local governments and input on the Plan development process.

Each affected local government was individually briefed at either the staff, managerial or elected official level. In addition, a public workshop was held in mid-July and notice was advertised in *The Sacramento Bee* and mailed to over 900 addresses of property owners within the airport area.

Section II. PLAN CONTENTS

4. How is the Plan structured?

There are three chapters to the Plan: 1) Introduction, 2) Policies, and 3) Airport and Environs Background Information. Additionally, a set of appendices elaborates on specific background topics, including state and federal aviation laws, the compatibility concepts in the policies chapter, and a discussion on wildlife hazards. Chapter 2 contains the policies by which the ALUC operates and conducts compatibility reviews of proposed land use and airport development actions. The key policy areas are noise, safety, airspace protection (including hazardous wildlife), and overflight. Each is described in questions below.

5. Which geographic areas does the ALUCP impact most?

Lands that are considered in the Airport Influence Area (AIA) are affected by the ALUCP. The AIA is defined as land in which current or future airport-related noise, overflight, safety or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses. Proposed land use projects in this area are subject to ALUC review to determine consistency within the ALUCP policies.

Each of the following have jurisdiction over lands within parts of AIA: the counties of Sacramento, Sutter and Yolo; and the cities of Davis, Sacramento, West Sacramento and Woodland. Map 1 on page 2-61 of the plan shows the AIA's relationship to the affected jurisdictions.

6. How does an updated ALUCP affect existing land uses?

Existing land uses are not affected by the ALUCP. Neither the ALUC nor the Plan have jurisdiction on land uses that either physically exist or for which a local agency has made commitments to a proposal entitling the project to go forward. One area of particular interest is the Garden Highway Special Planning Area (SPA). The updated Plan states that residential development in this area is meant to be consistent with other local regulations regarding this area, and is not to be further restricted (see question #20 below).

7. What are the two different Referral Areas within the Airport Influence Area?

The Airport Influence Area is divided into two sub-areas shown on Map 1 on page 2-61 which have different requirements for review by the ALUC.

Referral Area 1 encompasses locations where noise and/or safety represent compatibility concerns. If potential actions proposed to a local agency are consistent with the general plan or specific plan, it still may not be compatible with the ALUCP until specificity is provided on the proposed action. In this case, within Referral Area 1, the ALUC may need to review the proposed action against ALUCP compatibility criteria for noise and safety. A partial list of actions that may require review includes annexation, expanded sphere of influence, proposed residential development, projects that attract 100 or more people, buildings or structures with heights that may interfere with Federal Aviation Administration regulations, or anything that may create electrical interference, lighting, glare or visibility issues. Public comments on the drafts of the plan before it was adopted focused on a particular concern regarding hazardous wildlife; the latter topic is addressed in later in this FAQ.

Referral Area 2 includes locations where airspace protection and/or overflight are compatibility concerns, but not noise and safety. Essentially, any proposed actions that significantly increase electrical interference, lighting, glare, or visibility issues, or are of a height that may interfere with FAA regulations. Only in the most extreme cases does the Plan impact local government land use decisions (e.g. major communications microwave tower, major solar facility electric generator, etc.). Hazardous wildlife is discussed later below.

8. What noise compatibility policies are in the ALUCP?

The purpose of noise compatibility policies is to avoid establishment of noise-sensitive land uses near the airport that are exposed to significant levels of aircraft noise. The ALUCP uses the Community Noise Level (CNEL) metric, which measures more than just loudness over a single event. It also considers the number of noisy events over time. Cumulative exposure to aircraft noise is depicted in a set of contours.

The contours depict the anticipated noise generated by the aircraft operating at the airport over the planning time frame.

Map 2 on page 2-62 of the plan shows the noise contours at the Airport. Table 1 of the ALUCP (pages 2-51 to 2-54) shows different land use categories and what is compatible, conditionally compatible or incompatible for each CNEL level. The table is based on guidance from the California Airport Land Use Planning Handbook. One of the most significant criteria in the ALUCP is that new residential uses (creation of new residential parcels) are not allowed within the 60 CNEL contour or higher areas.

9. What safety compatibility policies are in the ALUCP?

The purpose of the safety compatibility policies is to minimize the risk associated with an off-airport aircraft accident or emergency landing. The policies focus on reducing the potential consequences of such events. The policies in the ALUCP evaluate two types of risks: (1) the likelihood that an accident may happen in terms of geographic location near the airport; and (2) the potential consequences of the risk, including the number of people in harm’s way. The ALUCP identifies six safety zones that are based on physical proximity to the airport runways. The ALUCP contains a safety compatibility table. There are six safety zones that show what is compatible, conditionally compatible or incompatible for each type of land use category. Map 3 on page 2-63 shows the different safety zones, and Table 2 (pages 2-55 to 2-59) shows the corresponding chart of what is compatible or not compatible.

10. What are the airspace protection policies in the ALUCP?

The airspace protection policies seek to prevent land use features that pose a hazard to aircraft in flight such as tall buildings near runways and antenna towers in flight pattern areas. Airspace hazards can be physical (e.g., tall structures), visual (e.g., glare) or electronic (e.g., interference for aircraft navigation and communications equipment). As indicated in the next question, the airspace protection policies also address uses that attract wildlife, particularly birds, to locations where they can pose hazards to aircraft operations either in the air or on the ground. The policies in the ALUCP rely upon the regulations and standards enacted by the Federal Aviation Administration and the State of California.

11. What overflight compatibility policies are in the ALUCP?

Overflight deals with noise of individual aircraft operations. The overflight compatibility policies in the ALUCP focus on ensuring that prospective purchasers of property near the airport are aware of the airports impacts. The policies do not restrict land use development in the manner that the noise, safety, and airspace protection policies do. The policies in the plan serve primarily to establish the form and requirements for notification about airport proximity as dictated by state law.

12. What is the difference between the 1994 Plan and the updated 2013 ALUCP?

The chart below summarizes the key differences

Comparing plans: Current vs. Proposed	1994 Comprehensive Land Use Plan (current plan)	Approved Updated 2013 Airport Land Use Compatibility Plan (ALUCP)
Airport Influence Area	AIA = Outer edge of FAR Part 77 surfaces (safety zone outline plus noise contour outline fall within this area)	Areas within radar tracks of 3000 feet altitude (FAA environmental criterion)

Noise contours	Does not allow residential with 60 CNEL or higher	Narrower area than current plan; does not allow residential within 60 CNEL or higher unless zoned already
Safety	Three safety zones. Old Zone 3 restricts to 50 persons per acre for non-residential	Six safety zones but same overall outline as 1994 Plan. Most zones less restrictive than current plan. Also, more flexibility depending on land use, floor area ratio and other factors.
Runways (in accordance with Airport Layout Plan)	2 runways 11,000 feet	3 runways plus planned extensions
Airspace Protection (height)	Follows FAA guidelines Part 77	Follows FAA guidelines Part 77
Hazardous Wildlife	Restricts or prohibits uses that would attract wildlife attractants within safety zones	If project is within 10,000 feet of Airport Operations Area and requires a zoning amendment, then requires project proponent to document consideration of FAA guidance on wildlife hazards. If outside of 10,000 feet or does not need zoning amendment, then no ALUC review.

13. What does the adoption of an updated plan mean for local governments?

The responsibility for the implementation of ALUC-adopted compatibility plans rests with the affected local agencies. However, the ALUC must consult with the involved agencies regarding establishment of airport influence areas (Public Utilities Code section 21675(c)). Each city and county affected by a compatibility plan must make its general plan and applicable specific plans consistent with the ALUCP, or the jurisdiction may take a series of prescribed steps established in the State Aeronautics Act to overrule the ALUC policies. Local agencies’ other responsibility is to refer their plans and certain proposed land use actions to the ALUC for review and determination of consistency with the ALUCP.

For instance, actions associated with individual development proposals are subject to ALUC review only until the local agency’s general plan and specific plan(s) have been made consistent with the compatibility plan or the agency has overruled the ALUC. However, as a matter of common practice, local jurisdictions often send development proposals to the ALUC for administrative review for consistency.

16. What if a local government wants to approve a project inconsistent with the ALUCP?

The State Aeronautics Act (Public Utilities section 21676) allows a local agency to overrule the ALUC with a two-thirds vote of its governing body. The local agency must also make findings that its plans are consistent with the intent of the Act, notify the ALUC and Caltrans, and hold a public hearing on the matter.

Section III: KEY PLAN UPDATES

17. What were the public comments on the prior draft of the Plan before it was approved?

SACOG received eight public comment letters on the April 2013 draft of the Plan and/or Initial Study. The vast majority of the comments related to policy 3.4.3, which contains the hazardous wildlife criteria. Other comments related to the draft Initial Study and a few other miscellaneous issues described below.

18. What is the single biggest concern raised in the public comments and how were they revised in the plan before it was approved?

The biggest concern raised by stakeholders is how the Plan would review proposed land use actions that potentially attract hazardous wildlife and are within 10,000 feet of Air Operations Area (AOA), which is any area of an airport used or intended to be used for landing, takeoff, or surface maneuvering of aircraft. The prior (April) version of the draft plan stated:

“For proposed Land Use Projects to be located within 10,000 feet of the Sacramento International Airport Air Operations Area, the ALUC shall deem as incompatible those uses that the FAA or other federal regulations and guidelines recommend against. Exceptions may be allowed where features are incorporated into the design to minimize the attraction of wildlife to the satisfaction of SCAS and the FAA.”

The public comments raised several questions about how this would work and whether it was appropriate public policy. A number of discussions with key stakeholders lead to a revised policy that reads:

“For proposed Land Use project to be located within 10,000 feet of Sacramento International Airport Air Operations Areas (AOA) and that include a zoning amendment and that could attract hazardous wildlife, the project proponent shall document consideration of current FAA and other federal regulations pertaining to hazardous wildlife attractants.”

This revised language in the approved ALUCP removed the ambiguity about what is and is not open to ALUC review, and minimizes ALUC review of planned conservation lands subject to other regulations. The writers of the comment letters addressing this issue have indicated that this revised policy is acceptable.

19. How does the approved Plan affect those areas outside of 10,000 feet of the AOA but within the Airport Influence Area?

Elsewhere within the Airport Influence Area (AIA), but beyond 10,000 feet from the AOA, the approved Plan was clarified. The approved language says that the ALUC will not play a regulatory role in the project. The ALUC may provide comment through the environmental review process for a proposed project or plan, or may contact the Sacramento County Airport System about the proposed project or plan. So, for some major projects, such as the Conaway Ranch, this means that the ALUC will not review any land use entitlements but may comment on them through the CEQA process. The airport operators could do the same.

20. What does the approved Plan mean for the Garden Highway community?

Neighbors in the Garden Highway community asked if the proposed Plan would affect their ability to construct homes. The intent of the plan was not to further restrict what they already are allowed to do within Sacramento County's regulations. As such, Policy 4.2.2 of the approved Plan provided additional clarity:

4.2.2 Garden Highway Special Planning Area: The intent of this Compatibility Plan is that it is internally consistent with the Garden Highway Special Planning Area, or SPA (last amended June 2002) of the Sacramento County Zoning Code. Construction or replacement of dwellings on existing parcels or the addition of a secondary dwelling unit, if allowed in accordance with the SPA and other local applicable regulations, is allowed under the Compatibility Plan in accordance with Policy 1.4.3. However, any lot splits or other subdivision of land to create additional residential parcels is only permitted if consistent with the policies of the *Compatibility Plan, the SPA* and other local applicable regulations.

21. Are there any specific concerns about the Initial Study and Intent to Adopt a Negative Declaration?

A number of issues were raised about the Initial Study in the public comment letters. Staff responded to each of these specific concerns in the response to comments matrix document. However, with the revision of Policy 3.4.3 as described above, all parties who made such comments have indicated that they no longer have concerns about the draft Initial Study.