

Ukiah 2026 Reorganization Project

Supplemental Environmental Impact Report

SCH #2022050556

prepared by

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June 2026

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Appendix A Notice of Preparation and Scoping Comments

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Executive Summary

This document is a Supplemental Environmental Impact Report (SEIR) to the City of Ukiah 2040 General Plan EIR ("2040 General Plan EIR") (SCH #2022050556), analyzing the environmental effects of the City of Ukiah 2026 Reorganization Project (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

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Project Description

This SEIR has been prepared to examine the potential environmental effects of the proposed project. The following is a summary of the full project description, which can be found in Chapter 2, *Project Description*.

The proposed project is located within and adjacent to the City of Ukiah in Mendocino County, California, and includes unincorporated areas within the City's Sphere of Influence (SOI). The project area consists of multiple geographically distinct areas generally located south, north-northeast, north, and east of the existing city limits. These areas are currently served by the Ukiah Valley Sanitation District, Millview County Water District, and Willow County Water District. Surrounding land uses include a mix of residential, commercial, industrial, public facilities, agricultural uses, and open space.

Project Characteristics

The proposed project consists of two primary components: a Reorganization Component and a Pre-Zone Component.

Reorganization Component

The Reorganization Component would reorganize jurisdictional and service boundaries within the City's SOI to improve efficiency and governance of water and wastewater services. Specifically, the project would:

- Annex unincorporated areas currently within the Millview County Water District and detach those same areas from Millview
- Annex areas within the Willow County Water District and detach those areas from Willow
- Annex areas within the Ukiah Valley Sanitation District; once at least 70 percent of the district's area is within city limits, the City would establish the district as a subsidiary district in accordance with applicable law
- Coordinate with the Pinoleville Rancheria regarding continued service provision without annexation

These actions would be processed in accordance with State law governing jurisdictional boundary changes and would require approval by the Mendocino County Local Agency Formation Commission (LAFCo).

Pre-Zone Component

The Pre-Zone Component would apply City land use designations and zoning to annexed areas at the time of annexation. This component would:

- Maintain consistency with existing County land use designations and zoning
- Not change allowable uses, development intensity, or site development standards
- Include a General Plan amendment to incorporate City land use designations that align with the County General Plan and Ukiah Valley Area Plan

The proposed project would not induce population growth, expand infrastructure capacity, or increase development beyond what is currently allowed under existing County zoning and land use regulations.

Project Objectives

- Promote logical and orderly municipal boundaries consistent with the City's existing SOI
- Improve efficiency and clarity in the provision and governance of water and wastewater services
- Align service areas and jurisdictional boundaries to reduce fragmented governance and unincorporated islands
- Maintain consistency with existing County and City land use policies through pre-zoning
- Implement reorganization actions without inducing growth, expanding infrastructure capacity, or changing development potential

Alternatives

As required by the California Environmental Quality Act (CEQA), this SEIR examines alternatives to the proposed project. Studied alternatives include seven alternatives. Based on the alternatives analysis, Alternative 2 is considered the environmentally superior alternative.

- No Project Alternative
- Alternative 1: Valley Oak (Original 2025 Proposed Reorganization)
- Alternative 2: Proposed Project plus Western Parcels and Brush Street Triangle
- Alternative 3: Proposed Project plus Brush Street Triangle
- Alternative 4: Proposed Project plus Western Parcels
- Alternative 5: Proposed Project minus Territory above Lake Mendocino Drive
- Alternative 6: Acorn (Proposed Project minus Territory Above Orr Springs Road)

No Project Alternative assumes that the proposed reorganization, annexations, and pre-zoning are not approved. Under this alternative, the City would not modify its SOI, annex lands within the Millview County Water District, Willow County Water District, or Ukiah Valley Sanitation District, or apply City pre-zoning. Existing jurisdictional boundaries, service providers, and County land use and zoning designations would remain unchanged, and no physical development would occur. This alternative would not achieve the project objectives, including improving efficiency and clarity in water and wastewater service provision, reducing fragmented governance, or promoting orderly municipal boundaries.

Alternative 1 (Valley Oak - Original 2025 Proposed Reorganization) would include a broader reorganization than the proposed project, including expansion of the City's SOI and more extensive annexation of lands within Millview, Willow, and the Ukiah Valley Sanitation District. Under this alternative, the City would consolidate a larger portion of these service areas and establish subsidiary districts, while maintaining existing land use designations through pre-zoning. No physical development or infrastructure expansion would occur. However, this alternative would extend the City's SOI into areas not identified for

annexation in the General Plan, resulting in reduced consistency with adopted land use policies and increased long-term planning uncertainty.

Alternative 2 (Proposed Project plus Western Parcels and Brush Street Triangle) would include the proposed project with the addition of western and eastern areas, including lands outside the City's existing SOI and areas not currently served by public water or wastewater systems. These areas include rural residential and agricultural lands, as well as an unincorporated island and portions of the Brush Street Triangle. No changes to land use designations, development potential, or infrastructure would occur. However, this alternative would expand the City's consideration of service provision into areas with uncertain long-term service conditions and would introduce greater uncertainty related to water supply, wastewater service, and land use planning consistency compared to the proposed project.

Alternative 3 (Proposed Project plus Brush Street Triangle) would include the proposed project with the addition of the Brush Street Triangle area located entirely within the City's existing SOI. This alternative would not expand the SOI or modify land use designations, zoning standards, or development potential. No construction or infrastructure expansion would occur. Compared to the proposed project, this alternative would create a more contiguous and cohesive planning area, reduce unincorporated islands, and improve service coordination within the existing SOI. Because it meets project objectives while maintaining similar environmental conditions, this alternative is identified as the environmentally superior alternative.

Alternative 4 (Proposed Project plus Western Parcels) would include the proposed project with the addition of westside areas outside the City's existing SOI, including the Oak Knoll and Doolan Canyon areas and an unincorporated island. These areas consist primarily of rural residential and agricultural uses and are not fully served by public water or wastewater systems. No changes to land use designations, development potential, or infrastructure would occur. However, this alternative would extend the City's SOI into areas not identified for annexation in the General Plan, resulting in reduced consistency with adopted land use policies and increased long-term planning uncertainty.

Alternative 5 (Proposed project minus territory above Lake Mendocino Drive) would include a reduced version of the proposed project by excluding parcels located north of the intersection of North State Street and Lake Mendocino Drive. This alternative would reduce the geographic extent of the reorganization area while maintaining the same approach to annexation and pre-zoning. No changes to land use designations, development potential, or infrastructure would occur. While this alternative would achieve many of the project objectives, it would not fully improve boundary continuity or reduce fragmented service areas to the same extent as the proposed project.

Alternative 6 (Acorn – Proposed project minus territory Above Orr Springs Road) would further reduce the project area by excluding parcels north of Orr Springs Road. This alternative represents the smallest reorganization area among the action alternatives and would minimize the inclusion of rural and agricultural lands. No changes to land use designations, development potential, or infrastructure would occur. However, this alternative would meet project objectives to a lesser degree by limiting the City's ability to create cohesive boundaries, reduce fragmentation, and improve service coordination.

Areas of Known Controversy

CEQA requires that an EIR discuss areas of controversy known to the Lead Agency including issues raised by agencies and the public (CEQA Guidelines Section 15123 (b)(2)). Controversial issues related to the proposed project are primarily those related to potential future development, conversion of agricultural resources, and utility provider capabilities. Responses to the Notice of Preparation of a Draft SEIR and input received at the SEIR scoping meeting held by the City are summarized in Chapter 1, *Introduction*.

Issues to be Resolved

The proposed project would require approval by the City of Ukiah Planning Commission/City Council to adopt a General Plan Amendment and establish pre-zoning for the parcels included within the project area. The City Council would also consider certification of this SEIR, along with the previously certified Ukiah 2040 General Plan EIR and the Mendocino County General Plan EIR, prior to taking action on the proposed reorganization.

Issues Not Studied in Detail in the SEIR

Consistent with CEQA Guidelines Sections 15162 and 15163, this SEIR focuses on environmental topics that were not adequately addressed in the previously certified Ukiah 2040 General Plan EIR and that could result in potential impacts associated with the proposed project. Based on the nature of the project, which consists of administrative boundary changes, annexations, and pre-zoning without authorizing development or physical improvements, there is no substantial evidence that significant impacts would occur in the following resource areas beyond those already evaluated in the Ukiah 2040 General Plan EIR: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, and Wildfire.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved pursuant to CEQA Guidelines Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under CEQA Guidelines Section 15091.
- **Less than Significant.** An impact that may be adverse but does not exceed the identified impact threshold levels and does not require mitigation measures.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Environmental Impact	Project Impact Conclusion	Mitigation Measure(s)	Residual Impact
Agricultural and Forestry Resources			
Impact AG-1 (Threshold 1, 2 and 5). The project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland) to non-agricultural use. The project would not conflict with existing zoning for agricultural use or a Williamson Act contract. The project would not involve other changes in the existing environment which could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.	No Impact	None Required	No Impact
Impact AG-2 (Threshold 3 and 4). The project would not conflict with existing zoning for, or cause rezoning of, forest land; timberland; or timberland zoned Timberland Production. The project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.	No Impact	None required	No Impact
Hydrology and Water Quality			
Impact HYD-1 (Threshold 1 and 5). The project would not include development and would not violate water quality standards or waste discharge requirements, or conflict with regulatory compliance. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.	No Impact	None required	No Impact
Impact HYD-2 (Threshold 2). The proposed project would not create an incremental increase in demand for groundwater supplies, nor would it directly interfere with the groundwater table or its recharge. No impact would occur.	No Impact	None required	No Impact
Impact HYD-3 (Threshold 3). The proposed project would not alter the existing drainage pattern of the project alignment, alter the course of a stream or river, or add new impervious surfaces. No impact would occur.	No Impact	None required	No Impact
Impact HYD-4 (Threshold 4). The proposed project is not subject to flooding from a tsunami or seiche, and regulations for development within a Federal Emergency Management Agency-designated flood zone would reduce the risk of pollutant release. No impact would occur.	No Impact	None required	No Impact
Land Use and Planning			
Impact LU-1 (Threshold 1). The project would not physically divide an established community. No impact would occur.	No Impact	None required	No Impact
Impact LU-2 (Threshold 2). The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.	No Impact	None required	No Impact
Utilities and Service Systems			
Impact UTIL-1 (Threshold 1). The proposed project would not facilitate or authorize development or infrastructure expansion. The project would not increase demand for water, wastewater, electric power, natural gas, telecommunications, or stormwater drainage facilities. No impact would occur.	No Impact	None required	No Impact

Environmental Impact	Project Impact Conclusion	Mitigation Measure(s)	Residual Impact
Impact UTIL-2 (Threshold 2). The proposed project would not facilitate or authorize development or infrastructure expansion. Water demand would remain consistent with existing conditions, and no expansion of water supply infrastructure would be required. No impact would occur.	No Impact	None required	No Impact
Impact UTIL-3 (Threshold 3). The project is administrative in nature and would not authorize development. The proposed project would not increase demand for wastewater treatment or require expansion of wastewater facilities. No impact would occur.	No Impact	None required	No Impact
Impact UTIL-4 (Threshold 4 and 5). The proposed project would not increase the volume of solid waste generated in Ukiah or annexed areas because it would not facilitate or authorize development. The proposed project is administrative in nature and would not result in the generation of construction or operational waste. Therefore, no impact would occur.	No Impact	None required	No Impact

1 Introduction

This document is a Supplemental Environmental Impact Report (SEIR) for the proposed reorganization of service territories within the City's existing Sphere of Influence (SOI) and the pre-zoning of annexed unincorporated areas located in the City of Ukiah and unincorporated Mendocino County (hereafter referred to as the "proposed project" or "project"). The proposed project consists of several geographically distinct areas located generally south, north-northeast, north, and east of city limits. These areas are currently within the service boundaries of the Ukiah Valley Sanitation District, Millview County Water District, and Willow County Water District. Most of the proposed project area was not identified as annexation areas in the City of Ukiah 2040 General Plan (2040 General Plan). However, most of the proposed project area is within the City's SOI, and nearly all of the proposed project area is within the planning area identified in the 2040 General Plan.

The proposed project consists of two components: a Reorganization Component and a Pre-Zone Component. The Reorganization Component would consist of changes in organization within the City's SOI involving several adjacent special water districts and unincorporated portions of Mendocino County located adjacent to the city. The proposed project also includes a Pre-Zone Component, under which the City would pre-zone unincorporated territories proposed for annexation in order to maintain the existing land use designations and zoning standards following annexation. Pre-zoning would occur concurrently with annexation and would not modify allowable land uses, development intensity, or site development standards for affected parcels. The Pre-Zone Component would include an amendment to the Land Use Element of the 2040 General Plan to ensure consistency between City land use designations and pre-zoning would be applied to annexed areas.

This section discusses (1) the project and SEIR background; (2) the legal basis for preparing an SEIR; (3) the scope and content of the SEIR; (4) the lead, responsible, and trustee agencies; and (5) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Chapter 2, *Project Description*.

1.1 Notice of Preparation and Scoping

The City of Ukiah distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on May 12, 2026 and ending on June 16, 2026. In addition, the City held an SEIR Scoping Meeting on June 1, 2026 The meeting, held at 5:00 PM , was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members. The meeting was held at Ukiah Valley Conference Center located at 200 South School Street. The City received letters from two agencies and ten individuals in response to the NOP during the public review period, as well as various verbal comments during the EIR Scoping Meeting. The NOP is presented in Appendix A of this EIR, along with the NOP responses received. Table 1-1 on the following page summarizes the content of the letters and verbal comments and where the issues raised are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Agency		
Native American Heritage Commission (NAHC)	States that the proposed project is subject to the requirements and provisions under Assembly Bill (AB 52) for tribal cultural resources.	Consultation required by AB 52 was carried out by the City of Ukiah. Subsequent issues are discussed in Chapter 5, *Other CEQA*.
Mendocino County Farm Bureau	Expresses concern that annexation could result in future zoning changes, increased development, and impacts to rural character and community identity.	Comments are addressed in Section 4.3, *Land Use and Planning*.
	Expresses concern that annexation could accelerate future development and increase traffic and roadway maintenance demands. Requests a roadway maintenance plan.	Comments are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding potential land use conflicts between future residential development and adjacent agricultural operations.	Comments are addressed in Section 4.1, *Agricultural and Forestry Resources*.
	Expresses concern regarding the City's ability to provide adequate law enforcement services and the fiscal impacts of annexation on County services.	Comments are addressed in Section 4.4, *Utilities and Service Systems*. Fiscal impacts that do not result in a physical environmental impact are outside the scope of CEQA review.
	Expresses concern regarding impacts to agricultural water supplies and requests analysis of future water demand and supply availability.	Comments are addressed in Section 4.2, *Hydrology and Water Quality* and Chapter 5, *Other CEQA*.
	Requests consideration of a reduced annexation area or other smaller-scale alternatives.	Comments are addressed in Chapter 6, *Alternatives*.
	Expresses concern regarding public outreach, transparency, and the public process associated with development of the annexation proposal.	This comment is outside the scope of the project and its associated environmental review.
Individual		
Joyce Archain	Expresses concern that unannexed areas of Ukiah could lose County revenue, resulting in reduced services or increased costs for residents, and states that affected residents should have input regarding revenue changes.	This comment is outside the scope of the project and its associated environmental review.
Jim Ronco	Requests analysis of impacts associated with extending water, wastewater, and electrical services to underserved annexation areas.	Comments are addressed in Section 4.2, *Hydrology and Water Quality,* and Section 4.4, *Utilities and Service Systems*.
	Requests analysis of impacts associated with adding police protection, patrols, surveillance, and municipal services to annexation areas.	Comments are addressed in Chapter 5, *Other CEQA*.
	Requests analysis of impacts associated with increased demands on infrastructure and public services resulting from future growth in annexed areas.	Comments are addressed in Section 4.2, *Hydrology and Water Quality,* and Section 4.4, *Utilities and Service Systems*. Growth-inducing impacts are addressed in Chapter 5, *Other CEQA*.
	Requests analysis of cumulative impacts associated with increased City staffing and municipal services.	Comments are addressed in Chapter 5, *Other CEQA*.

Commenter	Comment/Request	How and Where It Was Addressed
	Requests analysis of impacts associated with bringing existing land uses and structures into compliance with City codes and ordinances.	Comments are addressed in Section 4.3, *Land Use and Planning*.
	Requests analysis of impacts associated with reducing County water and sewer service areas.	Comments are addressed in Section 4.4, *Utilities and Service Systems*.
	Expresses concern regarding impacts to businesses associated with City taxation, fees, and regulations.	Economic and fiscal effects that do not result in a physical environmental impact are outside the scope of CEQA review.
	Expresses concern regarding annexation boundary decisions and annexation for revenue purposes.	This comment is outside the scope of the project and its associated environmental review.
	Requests analysis of impacts associated with the reduction of agricultural land resulting from annexation.	Comments are addressed in Section 4.1, *Agricultural and Forestry Resources*.
	Expresses concern regarding population growth and financial impacts on the City and existing residents.	Comments are addressed in Chapter 5, *Other CEQA*. Fiscal impacts that do not result in physical environmental impacts are outside the scope of CEQA review.
Julie Golden	Requests analysis of impacts to existing agricultural operations, including farming practices, water use, and potential loss of productive agricultural land.	Comments are addressed in Section 4.1, *Agricultural and Forestry Resources,* and Section 4.2, *Hydrology and Water Quality*.
	Expresses objection to the proposed annexation of privately owned agricultural and industrial properties and states that the annexation is primarily revenue-driven.	Economic and fiscal impacts that do not result in a physical environmental change are outside the scope of CEQA review.
	Expresses concern that City regulations, permitting requirements, taxes, and fees could affect the viability and value of agricultural, industrial, and commercial operations.	Comments are addressed in Section 4.3, *Land Use and Planning*. Economic and fiscal impacts are outside the scope of CEQA review.
	Requests analysis of impacts associated with extending water, sewer, roadway, and other infrastructure and services to annexed areas.	Comments are addressed in Section 4.2, *Hydrology and Water Quality,* Section 4.4, *Utilities and Service Systems* and Chapter 5, *Other CEQA, .*
	Requests consideration of alternatives that avoid annexation of agricultural and industrial lands.	Comments are addressed in Chapter 6, *Alternatives*.
	Expresses concern regarding public outreach and requests additional public meetings and scoping opportunities.	This comment is outside the scope of the project and its associated environmental review.
Marcia Morgan Lazaro	Requests clarification regarding the basis and extent of the City of Ukiah's proposed Sphere of Influence and annexation boundaries.	Comments are discussed in Section 4.3, *Land Use and Planning*.
	Requests analysis of wildfire response, emergency services, and jurisdictional responsibilities associated with annexation.	Comments are addressed in Section 4.4, *Utilities and Service Systems*.
	Expresses concern regarding impacts of annexation on County services, funding, and residents outside the proposed annexation area.	This comment is outside the scope of the project and its associated environmental review.

Commenter	Comment/Request	How and Where It Was Addressed
	Requests analysis of the benefits and service implications associated with annexation, including police, fire, utilities, and housing.	Comments are addressed in Section 4.4, *Utilities and Service Systems*.
	Expresses concern regarding public outreach and community engagement related to the annexation process.	This comment is outside the scope of the project and its associated environmental review.
Pinky Kushner	Requests consideration of a reduced annexation area or postponement of annexation until the City demonstrates its ability to provide consolidated services.	Comments are addressed in Chapter 6, *Alternatives*.
	Requests analysis of population trends and future housing demand.	Comments are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding urbanization impacts, including increased paving, heat island effects, air quality degradation, lighting impacts, and effects on wildlife and rural character.	Comments are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding the availability of water supplies to accommodate future growth and development.	Comments are addressed in Section 4.2, *Hydrology and Water Quality* and Chapter 5, *Other CEQA*.
	Requests analysis of impacts to residents who prefer a rural lifestyle and do not want urban improvements such as streetlights and sidewalks.	Comments relevant to CEQA are discussed in Section 4.3, *Land Use and Planning.*
	Requests analysis of whether utility and public services could be consolidated without annexation and references past issues associated with waste service consolidation.	Comments are addressed in Chapter 6, *Alternatives.* Fiscal and economic issues that do not result in a physical environmental impact are outside the scope of CEQA review.
Rob McCasey	Expresses opposition to the proposed annexation and concern regarding the City's ability to maintain services within existing City boundaries.	Comments are addressed in Section 4.4, *Utilities and Service Systems.*
Robert Mothershed	Expresses opposition to inclusion of privately owned property within the proposed annexation area.	This comment is outside the scope of the project and its associated environmental review.
Ron Bostwick	Expresses concern that annexation could accelerate growth and development and impact agricultural lands, open space, rural character, and community identity.	Comments are addressed in Section 4.1, *Agricultural and Forestry Resources,* Section 4.3, *Land Use and Planning,* and Chapter 5, *Other CEQA*.
	Requests analysis of the City's ability to provide adequate water, wastewater, police, fire, roadway maintenance, and other municipal services to annexed areas.	Comments are addressed in Section 4.2, *Hydrology and Water Quality,* and Section 4.4, *Utilities and Service Systems.*
	Requests analysis of impacts related to traffic, vehicle miles traveled, congestion, and roadway improvements associated with future development enabled by annexation.	Comments are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding long-term water supply availability and drought resilience.	Comments are addressed in Section 4.2, *Hydrology and Water Quality.*

Commenter	Comment/Request	How and Where It Was Addressed
	Requests analysis of environmental impacts associated with future infrastructure expansion and service extensions.	Comments are addressed in Section 4.4, *Utilities and Service Systems*.
	Requests consideration of alternatives that reduce environmental impacts, including smaller annexation areas, phased annexation, and maintaining existing boundaries.	Comments are addressed in Chapter 6, *Alternatives*.
	Requests disclosure of assumptions regarding future growth and development within annexation areas.	Comments are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding the public process, transparency, and responsiveness to community opposition.	This comment is outside the scope of the project and its associated environmental review.
Steve Miller	Expresses concern regarding the potential for future land use changes following annexation and uncertainty regarding the duration of existing land use protections.	Comments are addressed in Section 4.3, *Land Use and Planning*.
Lee Howard	Expresses concern regarding population trends, housing demand, and future population growth in Mendocino County.	Comments are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding potential urbanization effects, including heat island impacts, additional pavement, lighting, and effects on rural character.	Comments are addressed in Section 4.3, *Land Use and Planning,* and Chapter 5, *Other CEQA*.
	Expresses concern regarding impacts to air quality, wildlife, and the Russian River basin associated with future urbanization.	Comments are addressed in Section 4.2, *Hydrology and Water Quality* and Chapter 5, *Other CEQA*.
	Expresses concern regarding long-term water supply availability, groundwater resources, water rights, and the carrying capacity of the Ukiah Valley.	Comments are addressed in Section 4.2, *Hydrology and Water Quality*.
	Requests analysis of impacts to residents who prefer a rural lifestyle and do not want urban improvements such as sidewalks and streetlights.	Comments relevant to CEQA are addressed in Section 4.3, *Land Use and Planning*.
	Requests consideration of a No Project Alternative and analysis of whether services could be consolidated without annexation.	Comments are addressed in Chapter 6, *Alternatives*.
	Expresses concern regarding the City's ability to manage an expanded service area, including future staffing, facilities, and capital improvements.	Comments are addressed in Section 4.4, *Utilities and Service Systems*.
Scoping Meeting		
	Requests clarification regarding how annexation would affect existing businesses located within the proposed annexation area.	Comments relevant to CEQA are addressed in Section 4.3, *Land Use and Planning*.
	Requests analysis of the City's ability to provide adequate water, wastewater, police, fire, roadway maintenance, and other municipal services to annexed areas.	Comments are addressed in Section 4.2, *Hydrology and Water Quality,* and Section 4.4, *Utilities and Service Systems*.

Commenter	Comment/Request	How and Where It Was Addressed
	Requests analysis of potential impacts to bears and mountain lions, wildlife corridors, and open space.	Comments relevant to CEQA are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding additional VMT and vehicle trips.	Comments relevant to CEQA are addressed in Chapter 5, *Other CEQA*.
	Expresses concern regarding increase in tourism and associated increase in emissions.	Comments relevant to CEQA are addressed in Chapter 5, *Other CEQA*.
	Requests clarification on if existing County land uses would need to comply with City land use and zoning regulations.	Comments are addressed in Section 4.3, *Land Use and Planning*.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary approval of the City of Ukiah City Council; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this SEIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This SEIR has been prepared pursuant to CEQA Guidelines Sections 15162 and 15163 to evaluate whether the proposed City of Ukiah 2026 Reorganization Project would result in new or substantially more severe environmental impacts beyond those previously analyzed in the certified City of Ukiah 2040 General Plan EIR, the Mendocino County General Plan Update EIR, and the Ukiah Valley Area Plan (UVAP) EIR. The proposed project consists of jurisdictional reorganization and pre-zoning actions and does not authorize development or modify development assumptions evaluated in those prior environmental documents.

This SEIR relies on the analysis contained in prior program-level EIRs for development-related impacts and focuses on determining whether the proposed reorganization would result in new or substantially more severe environmental effects, or require additional mitigation measures.

This SEIR is intended to provide City decision-makers, responsible agencies, and the public with sufficient information to understand the potential environmental consequences of the proposed project and to make informed decisions in compliance with CEQA. The document identifies areas where impacts would remain consistent with previously certified environmental analyses and confirms where no additional environmental review is required.

1.3 Scope and Content

This SEIR has been prepared in accordance with relevant provisions of CEQA and CEQA Guidelines. Consistency with CEQA Guidelines sections pertaining to the applicability of SEIRs and program-level EIRs are provided below.

SEIRs are addressed in Section 15163 of the CEQA Guidelines, which states that:

> *The Lead Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.*

> *The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised;*
>
> *A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087;*
>
> *A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR;*
>
> *When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.*

Pursuant to CEQA Guidelines Section 15163, the City of Ukiah prepared this SEIR because only minor additions and changes would be necessary to make the previously certified 2040 General Plan EIR adequately apply to the proposed project. In addition, because the proposed project involves annexation of unincorporated lands governed by the Mendocino County General Plan and located within the UVAP, the analysis in this SEIR also relies on and incorporates relevant conclusions from the Mendocino County General Plan Update EIR and the UVAP EIR. Collectively, these documents evaluated land use patterns, growth assumptions, infrastructure provision, and environmental impacts applicable to both incorporated and unincorporated areas within Ukiah Valley.

An SEIR is the appropriate level of CEQA documentation for several reasons. First, the proposed project would expand the city limits, reorganize water service providers, and pre-zone new annexed land consistent with existing County zoning and land use designations. While these new components are necessary, they are not anticipated to substantially increase the severity of impacts identified in the previously certified 2040 General Plan EIR. Second, the proposed project would not introduce new development or propose projects that would increase populations or service populations beyond growth projections previously analyzed in the 2040 General Plan EIR. All of these components are anticipated to result in only minor updates to the land use scenario envisioned in the 2040 General Plan, Mendocino County General Plan, and UVAP.

1.4 Lead, Responsible, and Trustee Agencies

The CEQA Guidelines define lead, responsible and trustee agencies. The City of Ukiah is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies include the Mendocino County Local Agency Formation Commission (LAFCo) because it exercises discretionary authority over annexation, detachment, and reorganization actions, and Mendocino County as it retains discretionary authority over land use and resource regulation applicable prior to annexation. The EIR will also be submitted to these agencies for review and comment.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

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2 Project Description

The City of Ukiah 2026 Reorganization Project (proposed project) would consist of a reorganization of service territories within the City's existing Sphere of Influence (SOI) and the pre-zoning of annexed unincorporated areas. This section describes the proposed project, including the project proponent, lead agency, existing setting of the project site, project objectives, key elements of the project, potential buildout under the project, and the approvals needed to implement the proposed project.

2.1 Lead Agency

Craig Schlatter, AICP, Director
City of Ukiah, Community Development Department
300 Seminary Avenue
Ukiah, California 95482
707-463-6219

2.2 Project Location

The City of Ukiah is located along U.S. Highway 101 (US 101) in southeastern Mendocino County and serves as both the county seat and the largest city in the county. Ukiah is situated within the Russian River valley approximately 60 miles north of Santa Rosa and approximately 158 miles south of Eureka. Figure 2-1 illustrates the regional context of the city, including its relationship to nearby communities and the regional transportation network, as well as the city's municipal boundaries.

The proposed project is located within and adjacent to the City of Ukiah in Mendocino County, California. The proposed project area includes unincorporated parcels that are situated within the City's Sphere of Influence (SOI) but outside of the city limits. The proposed project area is shown in Figure 2-2.

The proposed project area consists of several geographically distinct areas located generally south, north-northeast, north, and east of city limits. These areas are currently within the service boundaries of the Ukiah Valley Sanitation District, Millview County Water District, and Willow County Water District. The individual reorganization areas of the proposed project are shown in Figure 2-3.

Surrounding Land Uses and Setting

The proposed project area is characterized by a mix of urban, suburban, and rural land uses, including residential neighborhoods, commercial and industrial areas, public facilities, agricultural uses, and open space. Surrounding development patterns vary by location but generally reflect existing land use designations and zoning regulations established by the County and City.

Figure 2-1 Regional Location

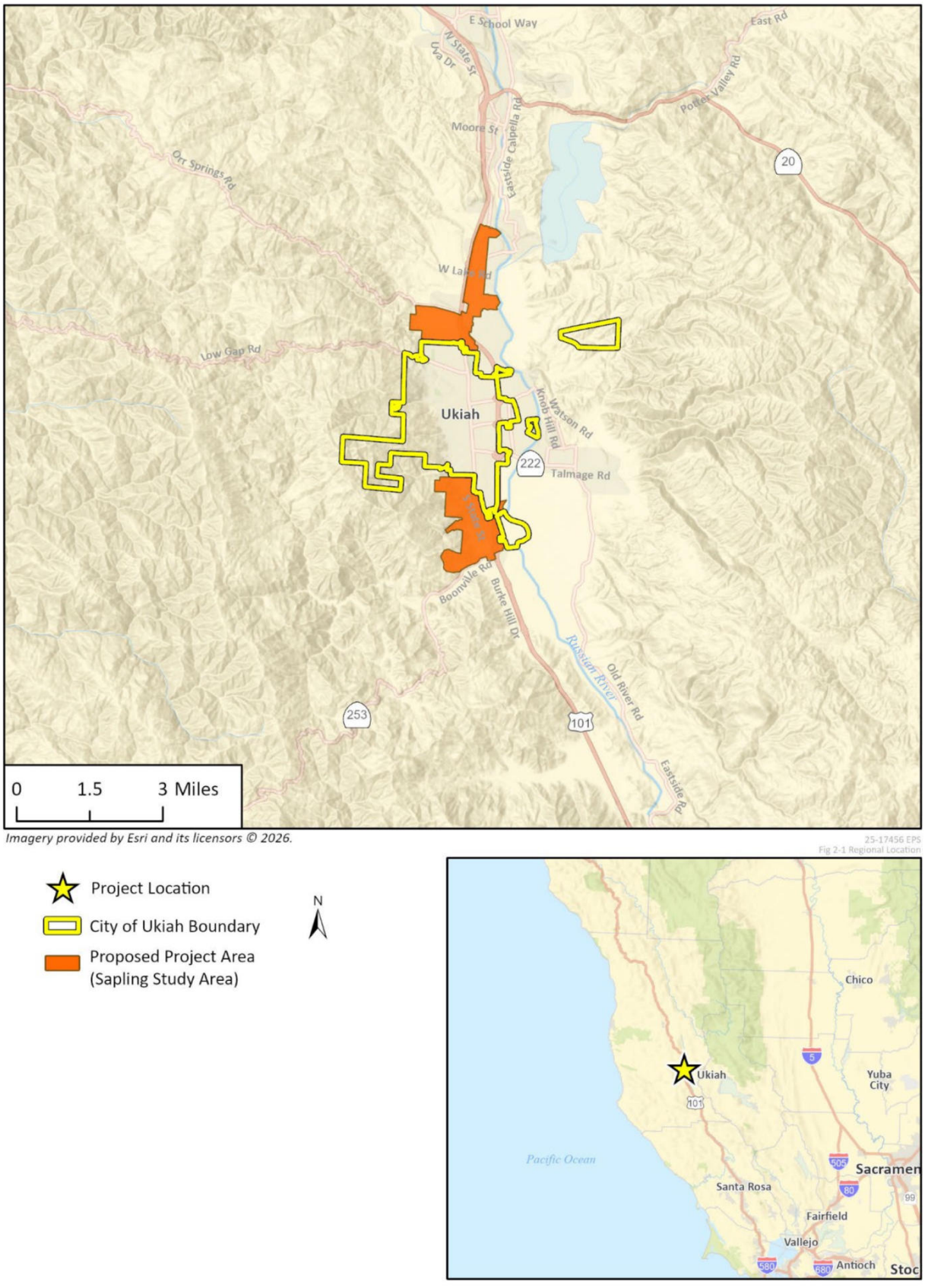

Figure 2-2 Project Area (Proposed Annexation Area)

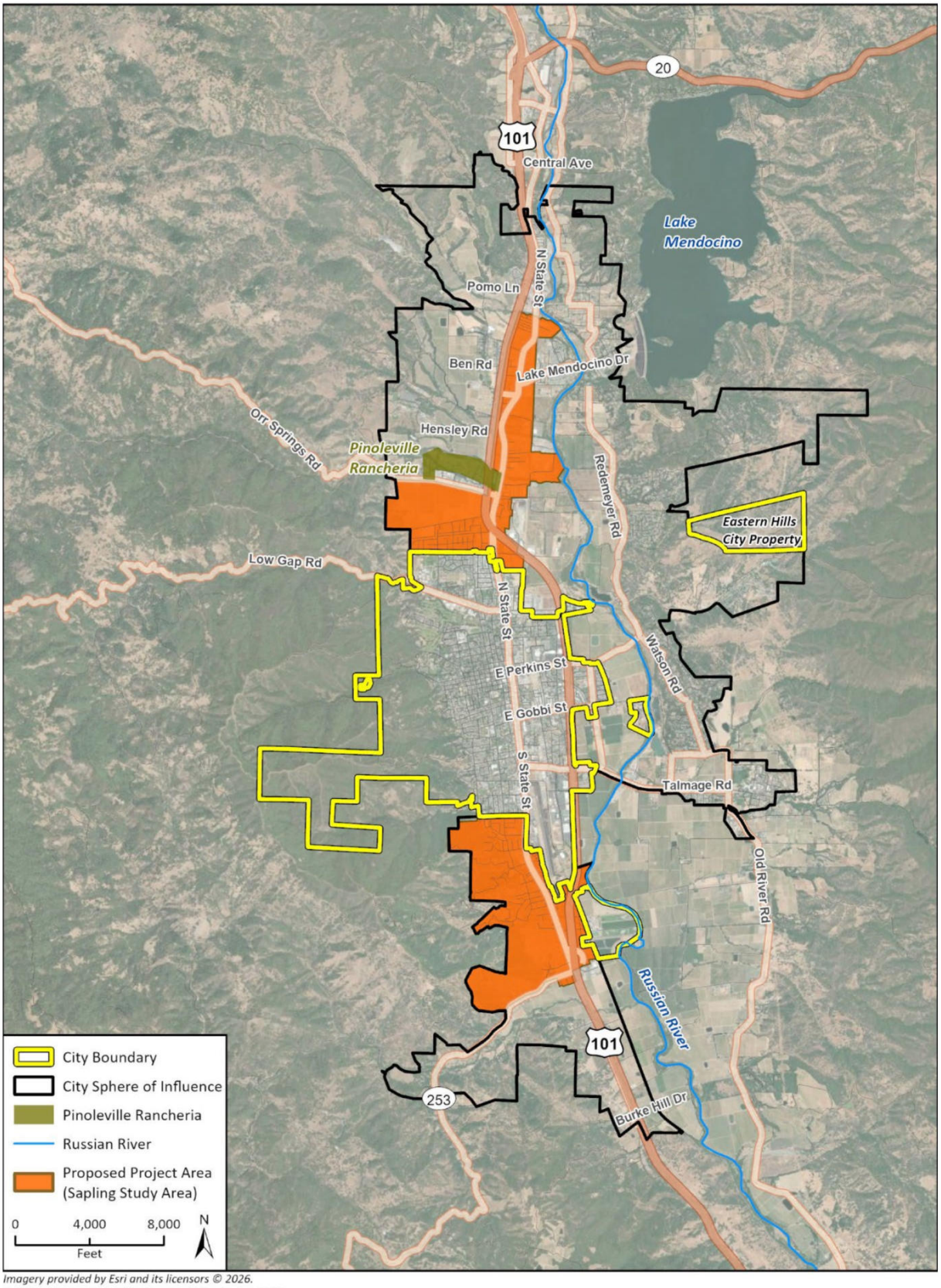

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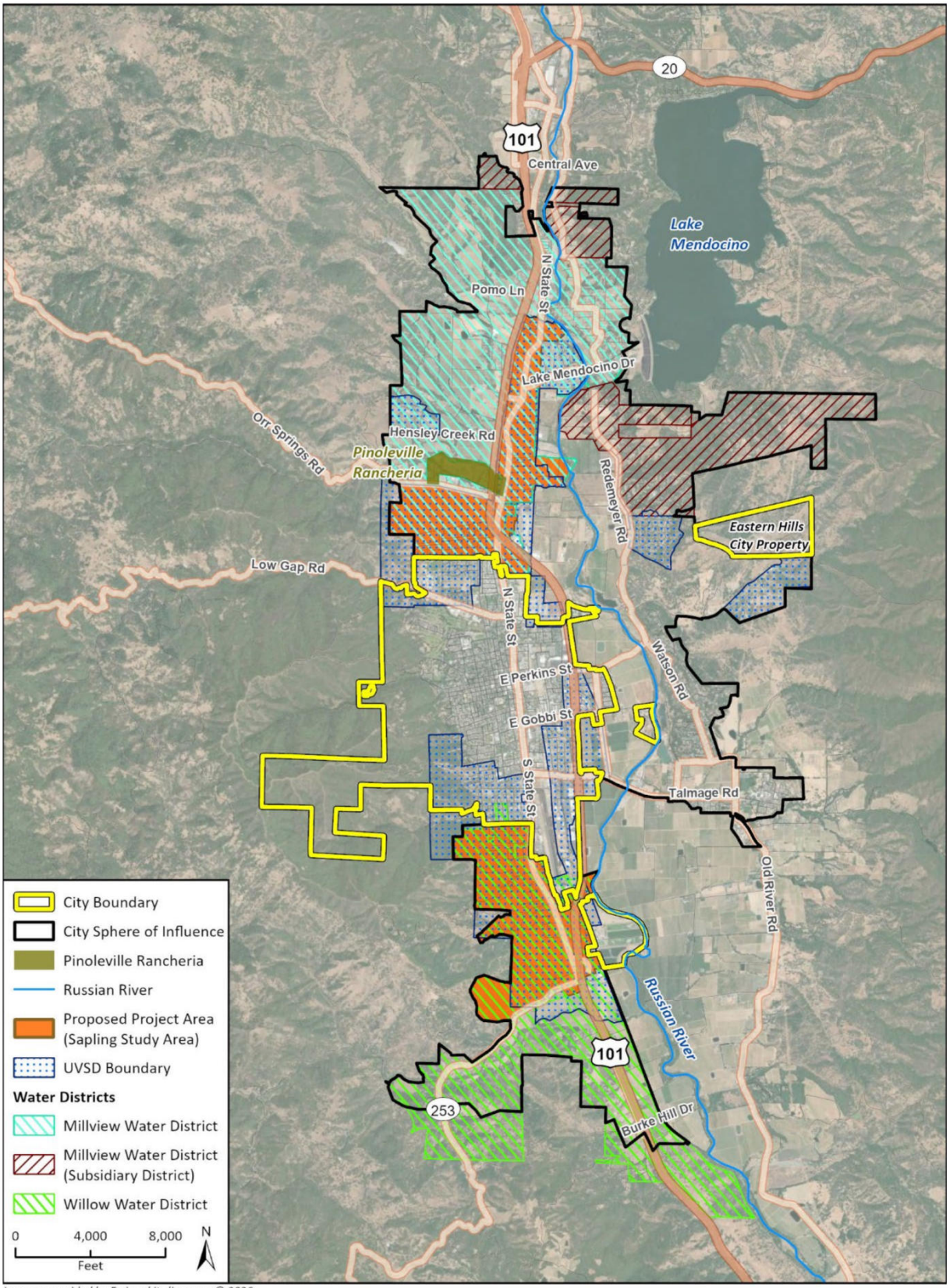
Figure 2-3 Project Reorganization Detail



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Additional data provided by County of Mendocino, 2026.

2.3 General Plan and Zoning

Most of the proposed project area was not identified as annexation areas in the City of Ukiah 2040 General Plan. However, most of the proposed project area is within the City's SOI, and nearly all of the proposed project area is within the planning area identified in the 2040 General Plan. While the 2040 General Plan does not assign City land use designations to the proposed project area, the County of Mendocino's General Plan (County General Plan) provides land use designations for these areas.

The County General Plan designates land uses within the proposed project area including commercial, industrial, residential, mixed use, public services, and agriculture, among others. The County's zoning ordinance provides zoning districts that are consistent with these land use designations.

Parcels within the proposed project area are currently subject to zoning regulations administered by Mendocino County. County zoning districts applied to the proposed project area are generally consistent with the applicable County General Plan land use designations.

2.4 Project Description

The proposed project consists of two components: a Reorganization Component and a Pre-Zone Component.

Reorganization Component

The Reorganization Component would consist of changes in organization within the City's SOI involving several adjacent special water districts and unincorporated portions of Mendocino County located adjacent to the city. As part of the Reorganization Component, the proposed project would include a reorganization involving the Millview County Water District (Millview) in which the City would annex territory within Millview and detach that same territory from Millview. The City proposes not to annex the territory in the Pinoleville Rancheria and will consult with Pinoleville regarding whether and to what extent the City may provide services to territory within Pinoleville Rancheria to maintain the existing levels of service already being provided. The proposed project would also include annexation of territory within the Willow County Water District (Willow) and would detach that same territory from Willow.

In addition, the City would annex territory within the Ukiah Valley Sanitation District (Sanitation District). Once at least 70 percent of the total acreage of the Sanitation District is located within the city, the City would establish the Sanitation District as a subsidiary district, consistent with applicable law.

Pre-Zone Component

The proposed project also includes a Pre-Zone Component, under which the City would pre-zone unincorporated territories proposed for annexation in order to maintain the existing land use designations and zoning standards following annexation. Pre-zoning would occur concurrently with annexation and would not modify allowable land uses, development intensity, or site development standards for affected parcels.

The Pre-Zone Component would include an amendment to the Land Use Element of the City of Ukiah 2040 General Plan to ensure consistency between City land use designations and pre-zoning would be applied to annexed areas.

General Plan Designations

As part of the proposed project's Pre-Zone Component, the City would apply land use designations consistent with the County General Plan and the Ukiah Valley Area Plan (UVAP). The UVAP is an element of the County General Plan that provides detailed land use policy direction for unincorporated lands within

the Ukiah Valley by refining and supplementing County General Plan policies to address land use, development patterns, and growth-related issues specific to the Ukiah Valley planning area.

Land use designations and zoning regulations applied following annexation would remain consistent with existing County standards, and no new development beyond what is currently permitted by right would occur.

Zoning

Through the Pre-Zone Component, the City would apply zoning districts to annexed parcels that mirror existing County zoning standards. No changes to allowable uses, development intensity, or site development standards are proposed.

The proposed project is initiated pursuant to state law governing changes in organization and jurisdictional boundaries of cities and special districts. The Local Agency Formation Commission of Mendocino County (Mendocino LAFCo) is responsible for reviewing and approving proposals for annexations, detachments, and reorganizations involving cities and special districts to ensure orderly growth, efficient service provision, and consistency with adopted policies. The proposed reorganization is intended to clarify service responsibilities, improve governance efficiency, and align service areas with the City's existing SOI.

2.5 Project Objectives

- Promote logical and orderly municipal boundaries consistent with the City's existing SOI
- Improve efficiency and clarity in the provision and governance of water and wastewater services
- Align service areas and jurisdictional boundaries to reduce fragmented governance and unincorporated islands
- Maintain consistency with existing County and City land use policies through pre-zoning
- Implement reorganization actions without inducing growth, expanding infrastructure capacity, or changing development potential

2.6 Required Approvals

Implementation of the proposed project would require the following discretionary actions by the City of Ukiah Planning Commission/City Council:

- Approval of a General Plan Amendment to incorporate the project area into the limits of the City and designate land uses
- Preliminary zoning of the parcels and lots comprising the project area
- Certification of this SEIR
- The Mendocino LAFCo must also consider this SEIR in conjunction with the City of Ukiah 2040 General Plan EIR and the County's General Plan EIR and make a decision whether to approve the proposed project.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Chapter 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The proposed project area is located within and adjacent to the City of Ukiah in southeastern Mendocino County, California. Ukiah serves as the county seat and is the largest city in Mendocino County. The city is situated along U.S. Highway 101 in the Russian River valley approximately 60 miles north of Santa Rosa and 158 miles south of Eureka. The project area includes multiple unincorporated parcels located within Ukiah's existing Sphere of Influence (SOI) but outside the current city limits. Figures 2-1 and 2-2 in Chapter 2, *Project Description*, illustrate the regional setting and the location of the proposed annexation and reorganization areas.

The proposed project area consists of several geographically distinct areas located generally south, north-northeast, north, and east of the city limits. These areas are currently served by the Ukiah Valley Sanitation District, Millview County Water District, and Willow County Water District, and are characterized by a mix of urban, suburban, and rural land uses, including residential neighborhoods, commercial and industrial areas, public facilities, agricultural lands, and open space.

Ukiah and the surrounding project area are served by a network of regional and local roadways, with U.S. Highway 101 providing the primary north-south transportation corridor through the city. Local circulation is provided by a system of arterial, collector, and local streets that connect the city to surrounding unincorporated areas within the SOI.

The Ukiah region experiences a Mediterranean climate, with warm, dry summers and cool, wet winters. Rainfall is concentrated primarily in the winter months. The project area lies inland from the Pacific coast and is not subject to direct coastal influences. Air quality in the Ukiah Valley reflects regional conditions of Northern California, with occasional seasonal impacts from vehicle emissions and wildfire smoke.

3.2 Project Site Setting

As shown in Figure 2-3 in Chapter 2, *Project Description*, the proposed project area consists of several geographically distinct unincorporated areas located within the City of Ukiah's existing SOI and adjacent to the current city limits. The project areas are generally bordered by a mix of incorporated city neighborhoods and unincorporated lands and are characterized by surrounding land uses that include residential neighborhoods, commercial and industrial development, public facilities, agricultural lands, and open space. Surrounding land use patterns vary by location but generally reflect existing development and service arrangements established by Mendocino County and the City of Ukiah.

Parcels within the proposed project area are currently developed or undeveloped and are subject to land use designations and zoning regulations administered by Mendocino County, consistent with the County General Plan and the Ukiah Valley Area Plan (UVAP). Existing land use designations within the project area include residential, commercial, industrial, mixed-use, public services, agricultural, and open space categories. Under the proposed project's Pre-Zone Component, the City of Ukiah would apply General Plan land use designations and zoning districts to annexed parcels that are consistent with existing County standards.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires SEIRs to consider potential cumulative impacts of the proposed project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in SEIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in Ukiah and surrounding unincorporated areas, are listed in Table 3-1. These projects are considered in the cumulative analyses in Chapter 4, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project Name	Project Location[1]	Land Use
City of Ukiah		
Ukiah Gateways	Talmage Road, Gobbi Street, and Perkins Street	Urban Design / Streetscape
Flock Transparency	Citywide	Municipal Operations
Downtown Zoning Code – General Plan Amendments and Rezones	Downtown Ukiah Planning Area	Land Use Regulation / Zoning reform
Ukiah Gigabit Fiber Project	Citywide	Utilities / Telecommunications
Urban Core Rehabilitation and Transportation Project	Main Street, Perkins Street, and Gobbi Street	Public right-of-way improvements
Commercial Shell Building	1294 North State Street	Commercial
Dual Branded Restaurant	1201 Airport Park Boulevard	Mixed-Use
Corporation Yard	1 Carousel Lane	Public Facilitates / Fleet Services
School Street Multimodal Transportation Corridor Study	Clay Street to Henry Street	Transportation
MCHC Urgent Care & Administration Building	1240 Airport Park Boulevard	Medical
Lookout Peak Trails	Lookout Peak Area	Open Space
Mendocino County (Unincorporated)		
Ackerman Creek Bridge Replacement	North State Street, CR 104, Milepost 0.97	Public Infrastructure / Transportation
North State Street Intersection Improvements	North State Street at Kuki Lane and US-101 ramps	Public Infrastructure / Transportation
Robinson Creek Bridge Replacement	Lambert Lane east of Ukiah city limits	Public Infrastructure / Transportation
Mountain View Road Improvements	Southern Mountain View Road	Public Infrastructure / Transportation

Source: City of Ukiah 2026; County of Mendocino 2026

4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Ukiah 2026 Reorganization Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the CEQA Guidelines Section 15382:

> …a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this SEIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Agriculture and Forestry Resources

This section summarizes the setting for agricultural and forestry resources, including agricultural lands, timber land, and forest land, and analyzes the impacts of the project to agriculture and forestry resources. Assessment of impacts is based partially on pertinent analysis provided in the City of Ukiah 2040 General Plan Environmental Impact Report (EIR), which evaluated agricultural and forestry impacts associated with buildout under the General Plan.

4.1.1 Setting

The City of Ukiah is located within central Mendocino County in the Ukiah Valley, an area that has historically supported agricultural production due to its relatively flat valley floor, fertile alluvial soils, and access to water resources. Agricultural lands in Mendocino County are distributed throughout interior valleys, river corridors, and upland grazing areas, with the Ukiah Valley representing one of the county's primary agricultural planning areas.

a. Agricultural Resources

Important Farmland

The California Department of Conservation (DOC) develops Important Farmland Maps as part of its Farmland Mapping and Monitoring Program (FMMP) and includes the following definitions for Important Farmland (DOC 2026a):

1. **Prime Farmland.** Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
2. **Farmland of Statewide Importance.** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
3. **Unique Farmland.** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
4. **Farmland of Local Importance.** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In some counties, Confined Animal Agriculture facilities are part of Farmland of Local Importance, but they are shown separately.
5. **Grazing Land.** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.
6. **Urban and Built-up Land.** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
7. **Other Land.** Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Regional Agriculture

Mendocino County supports a substantial amount of agricultural land, particularly within valley floor and gently sloping areas that contain soils suitable for cultivation and grazing. According to the FMMP, agricultural lands in the county include areas classified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Grazing Land. These classifications are based on soil quality, land use, and agricultural productivity and are used to inform land use planning and environmental review.

Agricultural activities in Mendocino County are distributed across several distinct agricultural regions, including coastal terraces, interior valleys, and river corridors. The Ukiah Valley represents one of the county's primary agricultural areas due to its relatively flat topography, fertile alluvial soils, and access to water resources. Agricultural uses within the Ukiah Valley predominantly include vineyards, orchards, pasturelands, and other cultivated agricultural activities supported by the area's fertile soils and valley geography. As shown on Figure 4.1-1, areas of Prime Farmland and Farmland of Statewide Importance are present within Mendocino County, including portions located north and south of the City of Ukiah.

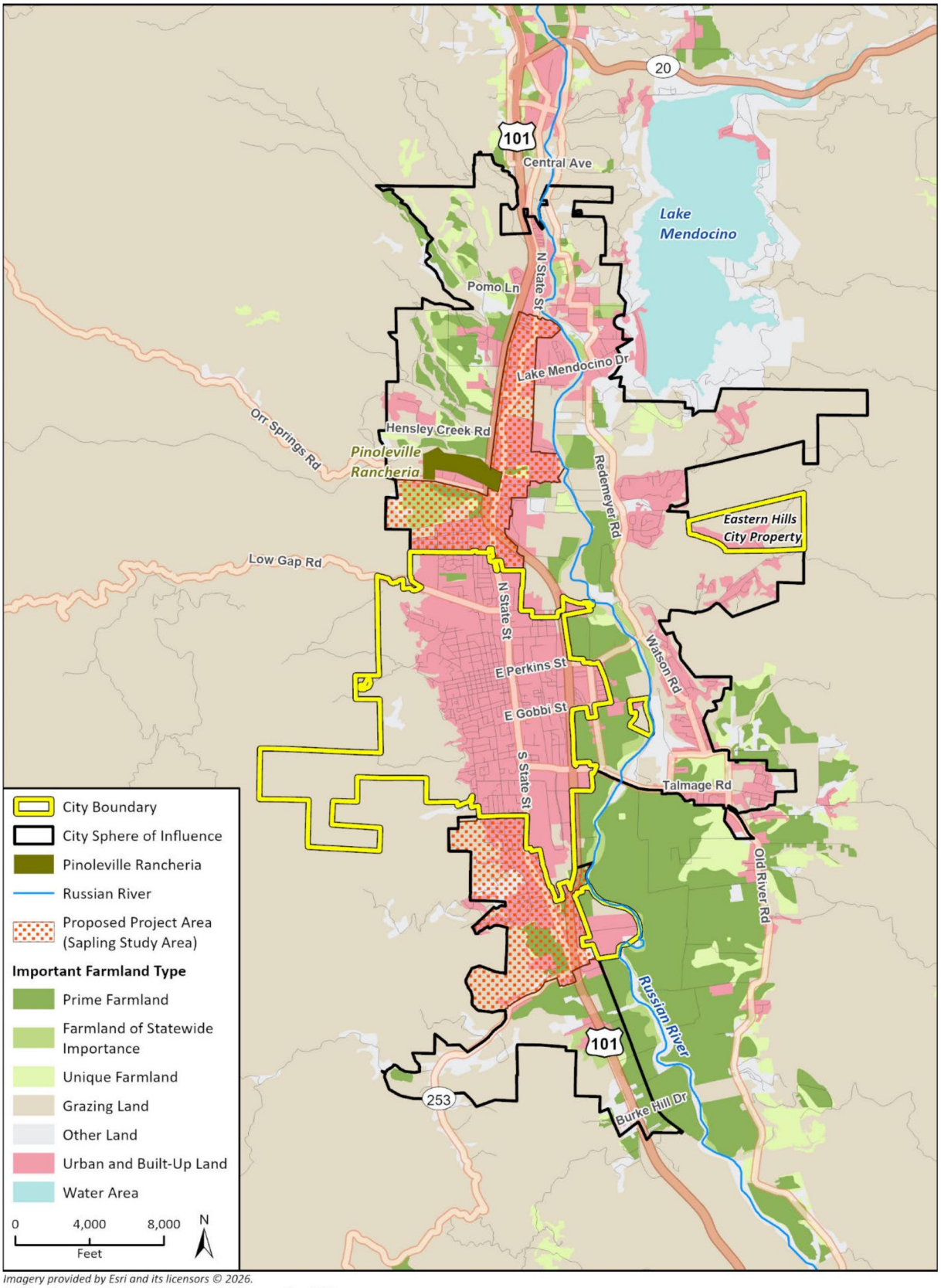
In addition to FMMP-designated farmland, surrounding areas are subject to the California Land Conservation Act of 1965 (Williamson Act). Lands under Williamson Act contract are restricted to agricultural and open space uses and are administered by Mendocino County. Figure 4.1-3 identifies Williamson Act lands within the region, including parcels located within the proposed project area (DOC 2026b).

LAFCo and Farmland

The Mendocino Local Agency Formation Commission (LAFCo) considers the protection of agricultural land as part of its review of jurisdictional boundary changes, including annexations and reorganizations. LAFCo policies relating to agricultural land are applied independently of the FMMP classifications used for CEQA analysis.

Under LAFCo policy, "prime agricultural land" may be defined more broadly than Prime Farmland as classified by the DOC. In some cases, lands such as grazing land that are not designated as Prime Farmland under FMMP may be considered prime agricultural land for purposes of LAFCo review. As shown on Figure 4.1-1, the proposed project area includes areas used for grazing and other agricultural purposes that may be subject to LAFCo farmland protection considerations.

Figure 4.1-1 Important Farmland in the Proposed Project Area



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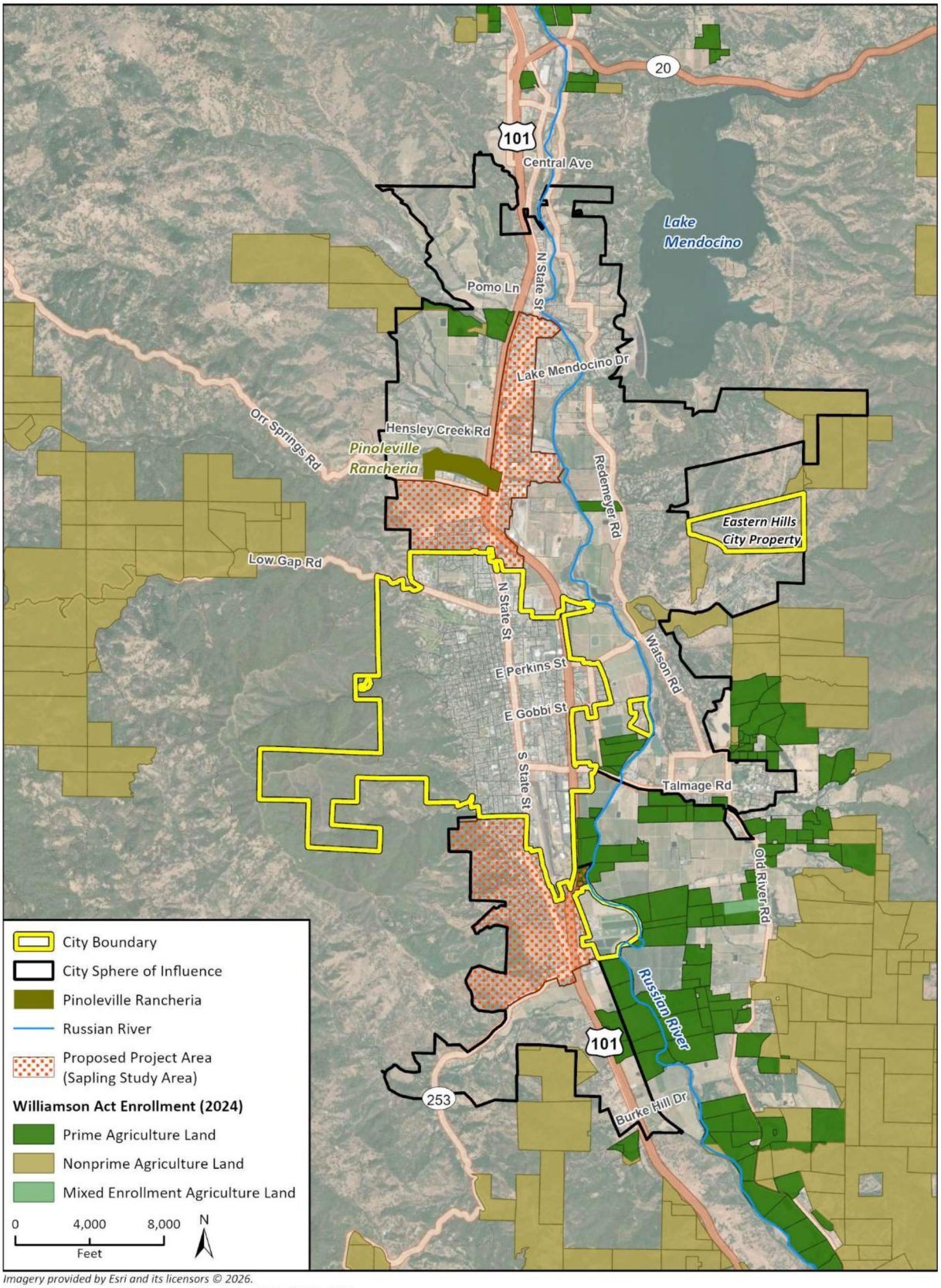
Additional data provided by CA Department of Conservation, 2022.

Figure 4.1-2 Williamson Act Contracts in the Proposed Project Area



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Additional data provided by County of Mendocino, 2026; FMMP, 2024.

b. Forestry Resources

Forest Land, Timberland, Timber Production Zones

The proposed project area does not have areas that are zoned for Forest Land or Timber Production Zones. There are associated lumber processing and industrial activities within the existing and proposed Sphere of Influence, but those are located on industrially zoned lots and would not be affected by the project. Forestry resources include forestland, timberland, and timberland production zones. Definitions used for forestland and timberland are those found in the California Public Resources Code (PRC) Sections 12220(g) and 4789.2(g) and California Government Code (CGC) Section 51104(g). These codes define forestland, timberland, and timberland production zones as follows:

Forest Land

Forest land is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits (PRC Section 12220(g)).

Timberland

Timberland means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species are determined by the board on a district basis (PRC Section 4526(g)).

Timberland Production Zones

Timberland production zones or "TPZ" means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h) (CGC Section 51104).

4.1.2 Regulatory Setting

a. Federal Regulations

Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that to the extent possible federal programs are administered to be compatible with state, local units of government and private programs and policies to protect farmland. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a Federal agency or with assistance from a Federal agency.

b. State Regulations

California Farmland Conservation Program Act

The California Farmland Conservancy Program Act, also known as Senate Bill (SB) 1142, established the California Farmland Conservancy Program, which provides grants for agricultural conservation easements. An agricultural conservation easement aims to maintain agricultural land in active production by preventing development on the subject parcel and prohibiting practices that would damage or interfere with the agricultural use of the land. Because the easement is a restriction on the deed of the property, the easement remains in effect even when the land changes ownership. While other benefits may accrue

because the land is not developed (scenic and habitat values, for example), the primary use of the land is agricultural. Easements funded by the California Farmland Conservancy Program must be of a size and nature suitable for viable commercial agriculture.

California Farmland Mapping and Monitoring Program

DOC, under the Division of Land Resource Protection, developed the FMMP to monitor the conversion of the state's farmland to and from agricultural use. Data is collected at the county level to produce a series of maps identifying eight land use classifications using a minimum mapping unit of 10 acres. The program also produces a biannual report on the amount of land converted from agricultural to non-agricultural use. The program maintains an inventory of state agricultural land and updates the "Important Farmland Series Maps" every two years (DOC 2016).

Right to Farm Act 1981

The Right to Farm Act (Civil Code Section 3482.5) is designed to protect commercial agricultural operations from nuisance complaints that may arise when an agricultural operation is conducting business in a "manner consistent with proper and accepted customs." The code specifies that established operations that have been in business for 3 or more years that were not nuisances at the time they began shall not be considered a nuisance as a result of new land use.

Williamson Act

The California Land Conservation Act of 1965, Sections 51200 et seq. of the California Government Code, commonly referred to as the "Williamson Act," enables local governments to restrict the use of specific parcels of land to agricultural or related open space use. Landowners enter into contracts with participating cities and counties and agree to restrict their land to agriculture or open space use for a minimum of ten years. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market (speculative) value.

c. Local Regulations

Mendocino County General Plan

The Mendocino County General Plan contains the following policies related to agriculture and forestry resources that would apply to the project:

Policy RM-103. Maintain extensive agricultural land areas and limit incompatible uses

Policy RM-109. Land shall not be converted from the Agricultural Lands or Range Lands classifications to non-agricultural classifications unless all of the following criteria are substantiated:

- The project will not result in a need for unintended expansion of infrastructure in conflict with other policies.
- The project will not adversely affect the long-term integrity of the agricultural areas or agricultural uses in the area.
- The proposed use in the subject location will achieve the long-range objectives of the General Plan.

Policy RM-110. Maintain land use compatibility and minimize conflicts between agricultural and non-agricultural uses

Policy RM-117. Protect the county's timber resources by discouraging the conversion or fragmentation of lands zoned "TPZ" to housing or some other use that permanently precludes its use for carbon sequestration, timber production or timber growing.

Policy RM-120 Promote sustainable forest management practices (e.g., carbon sequestration, reforestation, timber stand improvement, stream corridor, and water quality protection).

Policy RM-124. Protect forest conservation and timber harvesting operations by minimizing conflicts posed by non-resource uses.

Policy RM-125. Prohibit rezoning and development of prime timberland (Site Classes I, II, and III) classified for resource uses, including proposed resort uses, unless:

- The project is determined to be in the public interest, and
- State timber conversion permits are approved, and
- The project is consistent with land use, resource management, and other applicable General Plan goals and policies.
- Managing the property for carbon sequestration or timber production is no longer sustainable.

Ukiah 2040 General Plan

The Ukiah 2040 General Plan contains policies related to agriculture and forestry resources. The following goals and policies in the Land Use Element and Agriculture Element would apply to the project:

Goal LU-7. To ensure the orderly and timely growth and expansion of the City.

Policy LU-7.5. The City shall discourage urban development of unincorporated land in the City's Sphere of Influence until such lands are annexed by the City. The City shall support County land use regulations that require minimum lot sizes to protect the viability of local agriculture and to prevent the development of incompatible or undesirable land use patterns prior to eventual annexation and urbanization.

Goal LU-8. To promote growth and development practices that improve quality of life, protect open space, natural and historical resources, and reduce resource consumption.

LU-8.2. The City shall support the long-term economic viability of agriculture and agrotourism and encourage landowners with land in agricultural production to undertake succession planning or agricultural preservation, as appropriate.

AG-1. To preserve and strengthen agricultural uses in and around Ukiah that influence the regional economy.

AG-1.1. The City shall reduce conflict between incompatible uses and agriculture within and adjacent to the City.

AG-1.2. With the exception of presently proposed or approved subdivisions, the City shall discourage urban development on unincorporated land within its Sphere of Influence until annexed by the City. The City shall support County land use regulations that protect the viability of local agriculture in the Ukiah Valley.

Ukiah Valley Area Plan

The Ukiah Valley Area Plan (UVAP) includes the following goals and policies related to agriculture and forestry resources that would apply to the project:

OC3.1b. Agricultural Land Conversion Criteria: Proposals to convert Agricultural Lands to non-agricultural classification will be considered only after satisfying the following requirements:

- The project shall not result in a need for premature expansion of infrastructure in conflict with other Area Plan policies.
- The project shall not have a significant adverse effect on agricultural uses in the area. • The project site is substantially unusable for agricultural purposes due to encroaching adjacent nonagricultural uses.

- The proposal must achieve the long-range goals of the General Plan and Area Plan for the area as it exists prior to the proposal

Mendocino County LAFCo

The Mendocino County LAFCo defines prime agricultural land as an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meet any of the following qualifications:

- Land that qualifies, if irrigated, for rating as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not the land is actually irrigated, provided that irrigation is feasible.
- Land that qualifies for rating 80 through 100 Storie Index Rating.
- Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
- Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.
- Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.

City of Ukiah Municipal Code

Chapter 8 of the City of Ukiah Municipal Code, Article 1, establishes the City's Right-to-Farm framework to preserve and protect existing agricultural operations within the city and lands that may be annexed in the future. The chapter declares legally established agricultural operations to be a priority land use and not a nuisance, consistent with the Ukiah 2040 General Plan and State Right-to-Farm law and limits the circumstances under which agricultural activities may be subject to nuisance complaints or enforcement actions. By recognizing the continued viability of farming as urban development occurs, requiring disclosure to new non-agricultural landowners, and discouraging premature conversion of agricultural lands due to land use conflicts, Chapter 8 supports the long-term protection of agricultural resources while allowing for conversion only where consistent with adopted General Plan land use designations.

4.1.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

According to Appendix G of the CEQA Guidelines, impacts related to agricultural and forestry resources from implementation of the project would be significant if it would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))
4. Result in the loss of forest land or conversion of forest land to non-forest use

5. 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

Methodology

Agricultural and forestry impact assessments involved a review of data available through the Department of Conservation's FMMP maps, as well as County forest land and Williamson Act Land maps provided by the County of Mendocino. An adverse effect would occur if a proposed development would have an impact on existing, mapped agricultural or forest land.

b. Prior Environmental Analysis

Agricultural and forestry resources in the proposed project area have been evaluated in multiple previously certified environmental documents, including the Ukiah 2040 General Plan EIR, the Mendocino County General Plan Update EIR (County General Plan Update EIR), and the UVAP EIR. These documents provide programmatic analyses of agricultural land conversion, conflicts with agricultural zoning and Williamson Act contracts, agricultural/urban interface conflicts, and potential impacts to forest and timber resources within the Ukiah Valley and Mendocino County.

Ukiah 2040 General Plan EIR

Agricultural and forestry resources are analyzed in Chapter 4.2 (Agricultural and Forestry Resources) of the Ukiah 2040 General Plan EIR. The EIR evaluated impacts related to conversion of Important Farmland, conflicts with agricultural zoning and Williamson Act contracts, and impacts to forest land and timber resources. The EIR concluded that implementation of the General Plan would result in less-than-significant impacts to agricultural resources, with no loss of Important Farmland, no conflicts with Williamson Act contracts, and no impacts to forest land or timberland. These conclusions are supported by the City's Agricultural Resources Element goals and policies, which discourage incompatible urban development, reduce agricultural/urban conflicts, and support the continued operation of agricultural uses. No mitigation measures were required.

Mendocino County General Plan Update EIR

Agricultural resources are addressed in Chapter 4.2 (Agriculture) of the County General Plan Update EIR. The County EIR determined that implementation of the General Plan Update could result in conversion of agricultural land, timberland, or rangeland to other land uses and could create conflicts with Williamson Act contracts and agricultural/urban interface conditions. However, the EIR concluded these impacts would be less than significant due to the limited acreage affected relative to countywide totals and the application of County zoning regulations, Right-to-Farm provisions, Williamson Act requirements, and numerous General Plan policies intended to protect agricultural and timber resources. No mitigation measures were identified beyond compliance with adopted policies and County Code provisions.

Ukiah Valley Area Plan EIR

Agricultural resources are discussed in Chapter 3.1 (Land Use) and Chapter 4.0 (Growth-Inducing Impacts) of the UVAP EIR. The UVAP EIR concluded that implementation of the UVAP could result in conversion of agricultural lands, including Important Farmland and lands subject to Williamson Act contracts, and could generate agricultural/urban interface conflicts. These impacts were identified as significant and unavoidable at a programmatic level due to growth-inducing land use changes anticipated under UVAP. The UVAP EIR also found potentially less-than-significant impacts to forest resources, noting that while no lands are zoned for Timber Production, some woodland areas meeting the State definition of forest land could be affected by future development. The UVAP EIR identified mitigation measures intended to buffer agricultural uses and minimize displacement of commercial agricultural activities.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
Threshold 2:	Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?
Threshold 5:	Would the project 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?

Impact AG-1 The proposed project would include annexation and pre-zoning actions and would not authorize development, rezone agricultural land, conflict with agricultural zoning or Williamson Act contracts, or result in direct or indirect conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Therefore, there would be no impacts to agricultural resources.

FMMP maps prepared by the DOC identify areas of Prime Farmland and Farmland of Statewide Importance within the broader Ukiah Valley region, including portions of the proposed project area, as shown on Figure 4.1-1. These lands support ongoing agricultural activities such as vineyards, orchards, pasturelands, and grazing. In addition, some parcels within the region are subject to the Williamson Act, which restricts enrolled lands to agricultural and compatible open space uses through renewable contracts administered by Mendocino County.

The proposed project area consists of multiple, geographically distinct unincorporated parcels located within the City of Ukiah's Sphere of Influence that are currently under County jurisdiction. Land uses within the proposed annexation areas include a mix of developed urban and suburban uses, public and institutional uses, rural residential parcels, and limited areas designated for agricultural and open space uses under the Mendocino County General Plan and the UVAP. Agricultural lands within the proposed project area are generally characterized by small-scale grazing, pasture, and vineyard uses, and include parcels designated as Important Farmland or subject to Williamson Act contracts.

Annexed lands would retain land use designations and zoning regulations consistent with existing County standards and the UVAP. Agricultural uses currently permitted under County zoning would remain permitted following annexation. The project would not rezone agricultural land to non-agricultural use and would not conflict with zoning regulations intended to protect agricultural resources.

The proposed project area includes existing Williamson Act contracts. Annexation of lands into the City would not, in itself, terminate or conflict with existing Williamson Act contracts. The project would not include changes to land use regulations, development standards, or allowed activities that would be inconsistent with the terms of such contracts. Lands subject to Williamson Act contracts would remain restricted to agricultural and compatible open space uses unless and until contract nonrenewal or cancellation occurs through a separate discretionary process in accordance with State law.

In addition, the project would not involve construction, grading, infrastructure expansion, or other physical changes to the existing environment that could indirectly result in the conversion of farmland to non-agricultural use. The City would continue to apply its adopted General Plan Policies LU-7.5, LU-8.2, AG-1.1, and AG-1.2 that discourage premature urban development, reduce agricultural/urban conflicts, and support the long-term viability of agricultural uses within and adjacent to the City. In addition, land use consistency would be maintained with applicable Mendocino County General Plan resource management Policies RM-103, RM-109, and RM-110 that limit conversion of agricultural lands and maintain compatibility between agricultural and non-agricultural uses. The UVAP also includes Policy OC3.1b that discourage premature infrastructure extension or land use changes that would undermine the long-term viability of agricultural and forestry resources.

Agricultural resources and farmland conversion associated with development allowed under existing land use and zoning designations were previously evaluated in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and the UVAP EIR, including the potential for conversion of Important Farmland and conflicts with agricultural zoning and Williamson Act contracts resulting from future urban development. While the UVAP EIR identified significant and unavoidable agricultural impacts related to development potential under the UVAP, those impacts were attributed to growth-inducing development rather than administrative actions. The proposed project would consist of annexation and pre-zoning actions that would maintain existing County land use designations and zoning standards, would not authorize development, increase development intensity, or modify allowable land uses, and would not terminate or conflict with Williamson Act contracts. Accordingly, the proposed project would not result in new or substantially more severe agricultural impacts than those previously analyzed, nor would it expand the extent or severity of impacts identified in prior environmental documents. Therefore, no impacts would occur to agricultural resources. The project would not result in new or substantially more severe significant impacts to agricultural resources beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 3:	Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
Threshold 4:	Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Impact AG-2 No forest land, timberland, or timberland zoned Timberland Production occurs within the proposed project area. Implementation of the proposed project would not authorize development or change allowable land uses. Therefore, the project would not conflict with forest or timberland zoning or result in the loss or conversion of forest land, and no impact would occur.

The proposed project would not involve construction, grading, vegetation removal, or other physical changes that could result in the loss or conversion of forest land to non-forest use.

Forest and timber resource impacts were previously evaluated in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, all of which concluded that impacts related to forest land, timberland, and TPZs would be less than significant or would not occur, as such land designations are not prevalent within the Ukiah Valley. Consistent with those findings, the proposed project would maintain existing land use designations and zoning standards and would not introduce new development or land use changes affecting forest or timber resources. Accordingly, the proposed project would not result in conflicts with forest or timberland zoning, nor would it cause the loss or conversion of forest land to non-forest use. Therefore, no impacts would occur to forest or timber resources. The project would not result in new or substantially more severe significant impacts to agricultural resources beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis are required.

Mitigation Measures

No mitigation measures would be required.

4.1.4 Cumulative Impacts

A project's environmental impacts are considered cumulatively considerable if the incremental effects of an individual project are significant when viewed in connection with the effects of past, present, and reasonably foreseeable future projects (CEQA Guidelines Section 15065[a][3]). The geographic scope for cumulative agricultural and forestry impacts includes agricultural lands, grazing lands, and forestry resources within the Ukiah Valley and surrounding portions of Mendocino County, where regional land use planning decisions and growth trends could affect agricultural and forest resources.

Past, present, and reasonably foreseeable future development within Mendocino County and the City of Ukiah could cumulatively result in the conversion of agricultural land to non-agricultural uses, increased agricultural/urban interface conflicts, and long-term pressure on agricultural viability. At a regional level, these cumulative impacts have been evaluated in the Ukiah 2040 General Plan EIR, the County General Plan Update EIR, and the UVAP EIR, which identified that agricultural land conversion and related conflicts may occur over time as part of broader planning and growth patterns. However, the proposed project would be limited to jurisdictional boundary changes, including annexation, detachment, and reorganization, and the application of pre-zoning that mirrors existing County land use designations and zoning standards. The proposed project would not authorize new development, increase development intensity, expand infrastructure capacity, or modify allowable land uses on agricultural lands. As a result, the project would not contribute to cumulative agricultural land conversion, conflict with agricultural zoning or Williamson Act contracts, or otherwise induce development that could affect agricultural resources.

In addition, the City of Ukiah's General Plan policies and applicable Mendocino County General Plan and UVAP policies that protect agricultural resources, discourage premature urban development, and minimize agricultural/urban interface conflicts would continue to apply following annexation. These policies are intended to maintain the long-term viability of agricultural uses and reduce cumulative impacts to agricultural resources at a regional scale. With respect to forestry resources, no forest land, timberland, or Timberland Production Zone lands occur within the proposed project area. The proposed project would not involve development, vegetation removal, or land use changes that could affect forest resources, and therefore would not contribute to cumulative impacts related to forest land loss or conversion.

Overall, because the proposed project would not directly or indirectly result in agricultural land conversion, conflicts with agricultural zoning or Williamson Act contracts, or impacts to forest resources, it would not contribute to cumulative agricultural and forestry impacts.

4.2 Hydrology and Water Quality

This section identifies and evaluates impacts of the project related to hydrology and water quality. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to hydrology/water quality; and potential impacts related to hydrology and water quality that would result from implementation of the project.

4.2.1 Setting

The City of Ukiah is located in central Mendocino County, approximately 26 miles east of the Pacific Ocean, within the Ukiah Valley. The nearest major city is Santa Rosa, located approximately 60 miles to the south, while San Francisco and Sacramento are located approximately 100 miles to the south and southeast, respectively. The city is bounded by rolling hills and uplands to the west, the Russian River and associated floodplain to the east, and the Redwood Valley to the north (City of Ukiah 2020). Ground elevations generally slope toward the Russian River, which functions as the primary regional drainage feature. The City of Ukiah is located inland in the Russian River Valley, approximately 26 miles east of the Pacific Ocean, and is separated from the coastline by the Coast Ranges.

The proposed project area includes unincorporated lands located within the City of Ukiah's Sphere of Influence and adjacent to the city limits. These areas are part of the broader Ukiah Valley and share similar topographic, hydrologic, and climatic characteristics as the city, including valley floor areas, gently sloping terraces, and foothill landscapes. Drainage patterns in unincorporated areas generally flow toward the Russian River or its tributaries through a combination of natural channels, agricultural drainage features, and roadside ditches. Land uses in these areas include rural residential development, agricultural uses, public facilities, and developed urban uses, which can influence local drainage characteristics and stormwater runoff patterns.

The city and surrounding unincorporated areas lie within the Russian River watershed, which serves as the primary regional drainage system. The Russian River flows along the eastern boundary of the city and conveys surface water southward toward the Pacific Ocean. Within the City, surface drainage is accommodated through a combination of natural drainage courses, modified channels, and a network of storm drains and culverts that convey runoff from developed areas and surrounding hillsides toward the Russian River. Several smaller tributaries and drainage swales, many of which are channelized or partially enclosed, are present within and adjacent to the city limits and contribute to localized stormwater conveyance.

Development adjacent to creeks, floodplains, and drainageways has the potential to influence local drainage patterns and flood behavior. During large storm events, runoff from surrounding hillside areas, combined with elevated river flows, can result in localized flooding, particularly in low-lying areas near creeks and within portions of the Russian River floodplain. Maintaining existing drainage capacity and accommodating storm flows are ongoing considerations in land use planning and infrastructure management within the city.

Mendocino County, including Ukiah, is characterized by a temperate Mediterranean climate, with hot, dry summers and mild, wet winters. Average temperatures are highest between June and August and lowest between November and February. July is typically the hottest month, with an average high temperature of approximately 91 degrees Fahrenheit, while December is the coldest month, with an average low temperature of approximately 37 degrees Fahrenheit. Precipitation occurs primarily between October and April, with rainfall most heavily concentrated during the winter months of December through February (US Climate Data 2026). Seasonal rainfall patterns strongly influence surface runoff volumes, streamflow levels, and groundwater recharge throughout the Ukiah Valley.

a. Surface Water

The California Department of Water Resources (DWR) divides surface watersheds in California into 10 Hydrologic Regions. The proposed project area lies within the North Coast Hydrologic Region, which encompasses approximately 19,400 square miles and extends from the Oregon Border south to Marin County, and from the Pacific Ocean eastward to the crest of the Coast Ranges (DWR 2014).

The DWR further subdivides Hydrologic Regions into subregions, and further into basins, subbasins, watersheds, and subwatersheds. Within the North Coast Hydrologic Region, the proposed project area is within the Russian River Watershed. The Russian River watershed is one of the largest drainage systems in the North Coast Hydrologic Region. The Russian River flows generally southward through Mendocino and Sonoma counties before turning west and discharging to the Pacific Ocean near Jenner. Surface water features within and surrounding the city ultimately drain to the Russian River, which serves as the primary regional drainage feature for the Ukiah Valley (DWR 2014).

Water Quality

Water quality in the proposed project area is governed by the North Coast Regional Water Quality Control Board (NCRWQCB), which sets water quality standards in the Water Quality Control Plan for the North Coast Region (Basin Plan) for the Lower Klamath Lake and Lost River Basins, including the Russian River watershed (NCRWQCB 2025a). The Basin Plan identifies existing and potential beneficial uses of waters of the State and establishes water quality objectives to protect those uses. Beneficial uses are designated for individual waterbodies or groups of waterbodies within the North Coast Region and may include municipal and domestic supply, agricultural supply, recreation, fisheries habitat, freshwater habitat, and wildlife habitat (NCRWQCB 2025a). The Russian River and several reaches of its tributary drainage network within Mendocino County have designated beneficial uses that commonly include Municipal and Domestic Supply, Agricultural Supply, Water Contact and Non-Contact Recreation, Cold Freshwater Habitat, Warm Freshwater Habitat, Fish Spawning, and Wildlife Habitat, consistent with Basin Plan designations for inland surface waters in the North Coast Region (NCRWQCB 2025a).

The Clean Water Act 303(d) list is a register of impaired and threatened waters which the Clean Water Act requires all states to submit for United States Environmental Protection Agency (USEPA) approval. The list identifies all waters where the required pollution control measures have so far been unsuccessful in reaching or maintaining the required water quality standards. Waters that are listed are known as “impaired.” According to the State Water Resources Control Board (SWRCB), multiple reaches of the Russian River within Mendocino County, including areas upstream and downstream of the City of Ukiah, are listed as impaired under Section 303(d). Identified impairments in the Russian River watershed include pathogens (indicator bacteria), sediment, temperature, mercury, nutrients, and low dissolved oxygen, among others. These impairments have resulted in the development of Total Maximum Daily Loads (TMDLs) and implementation programs adopted or under development by the North Coast RWQCB to improve water quality conditions in the watershed (NCRWQCB 2025b).

b. Groundwater

DWR’s Bulletin 118 is the State’s official groundwater basin inventory and defines basin boundaries and describes hydrologic characteristics for groundwater basins throughout California. Bulletin 118 is periodically updated to reflect revised basin boundaries and improved hydrogeologic information. The proposed project area is located within the Ukiah Valley Groundwater Basin (DWR Basin No. 1-052). The basin is approximately 22 miles long and up to five miles wide at its widest point and is the largest of several groundwater basins located along the Russian River. The Ukiah Valley Groundwater Basin is designated as a medium-priority basin under the Sustainable Groundwater Management Act (SGMA) and is managed by the Ukiah Valley Basin Groundwater Sustainability Agency (UVBGSA) in accordance with the adopted Ukiah Valley Basin Groundwater Sustainability Plan (GSP).

Most of the land within the basin is privately owned, with smaller areas owned by the State, federally owned lands in the vicinity of Lake Mendocino, and limited California Tribal Reservation and Rancheria

lands. The Russian River flows along the length of the basin and is hydrologically connected to groundwater resources within the valley. Lake Mendocino, located along the eastern portion of the basin, provides managed releases to the East Fork of the Russian River through operation of Coyote Dam, influencing both surface water and groundwater conditions in the Ukiah Valley. The Ukiah Valley Groundwater Basin is bounded by the Mendocino Range of the Coast Ranges and is bordered to the south by the Sanel Valley Groundwater Basin (DWR Basin Number 1-053). Groundwater conditions within the basin provide an important regional water supply resource for municipal, agricultural, and domestic uses within and adjacent to the City of Ukiah.

Groundwater Quality

Ongoing groundwater management and protection measures are implemented through Basin Plan requirements and the Ukiah Valley Basin GSP. Beneficial uses and water quality objectives are established by the NCRWQCB through the Basin Plan to protect municipal, domestic, agricultural, and environmental uses of groundwater resources. Groundwater quality within the basin is influenced by a combination of natural geologic conditions, land use patterns, and surface-groundwater interactions associated with the Russian River watershed.

c. Flood Hazards

Flood hazards can occur when the amount of rainfall exceeds the infiltration capacity of the surrounding landscape or the conveyance capacity of the stormwater drainage system. The Federal Emergency Management Agency (FEMA) delineates regional flooding hazards as part of the National Flood Insurance Program (NFIP). FEMA identifies flood hazard risks through its Flood Insurance Rate Map (FIRM) program. Higher flood risk zones are called Special Flood Hazard Areas; these areas have a 1 percent chance or greater of flooding in any given year (also called the 100-year flood). Although a 100-year flood will, on average, occur once every 100 years, the probability of a 100-year flood is 1 percent for any particular year. Two 100-year floods could occur in the same year or even in the same month, but the likelihood that two 100-year flood events would occur consecutively is very small.

According to FEMA FIRMs for the City of Ukiah, Special Flood Hazard Areas designated as Zone A and Zone AE are present in multiple locations throughout the city. These areas are generally associated with creek corridors, agricultural lands, and low-lying developed areas, including portions of western, central, northern, and southwestern Ukiah, as well as adjacent unincorporated lands. FEMA-designated Special Flood Hazard Areas are also present in portions of the surrounding area, particularly along the Russian River corridor and associated tributaries, where flood risks are influenced by regional watershed conditions and topography (FEMA 2025).

According to tsunami hazard maps prepared by DOC, tsunami hazard zones are mapped along portions of the California coastline and low-lying coastal areas. The proposed project area is located inland within Mendocino County and is not located within a tsunami hazard area (DOC 2026). Seiches are standing waves that typically occur in large, enclosed bodies of water, such as lakes or reservoirs, as a result of seismic activity or other disturbances. Surface water features in the vicinity of the proposed project area include rivers, creeks, and stormwater conveyance facilities.

4.2.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Prevention and Control Act of 1948 was the first major law to address water pollution in the United States. In 1972, the Federal Water Pollution Control Act was amended and became known as the Clean Water Act. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the USEPA the

authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and United States Army Corps of Engineers (USACE).

The federal Clean Water Act places the primary responsibility for the control of water pollution and for the planning of development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. At the state and regional levels in California, the Clean Water Act is enforced by the SWRCB and the nine RWQCBs.

Section 303(d): Impaired Waters and Total Maximum Daily Loads (TMDL)

Section 303(d) of the Clean Water Act requires states to identify water bodies that do not meet water quality objectives and are not supporting beneficial uses. Each state must submit an updated biennial list, called the 303(d) list, to USEPA. In addition to identifying the water bodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing the impairment. Once a water body has been deemed impaired, a TMDL must be developed for each pollutant causing an impairment. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

Section 401: Water Quality Certification

Section 401 of the Clean Water Act regulates discharges of fill and dredged material to waters of the United States. Under Section 401, the SWRCB and RWQCBs have regulatory authority over actions in waters of the United States through the issuance of water quality certifications, which are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the Clean Water Act, described below). Section 401 provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny any proposed activity that could result in a discharge to surface waters of the State. To waive or certify an activity, these agencies must find the proposed discharge would comply with State water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued.

Section 402: National Pollutant Discharge Elimination System

Section 402 of the Clean Water Act establishes the National Pollutant Discharge Elimination System (NPDES) regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the Clean Water Act to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by the USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[1] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

The USEPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve stormwater quality, the USEPA promulgated

[1] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land.

In California, the NPDES program is administered by SWRCB through the nine RWQCBs.

Section 404: Discharge of Dredge or Fill

Section 404 of the Clean Water Act requires a permit be issued by USACE before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulations (e.g. farming activities, maintenance activities, construction of temporary sedimentation basins, construction and maintenance of forest roads or temporary mining roads). Waters of the United States generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands). When an application for a Section 404 permit is made, the Applicant must show it has:

- Taken steps to avoid impacts to wetlands or waters of the U.S. where practicable;
- Minimized unavoidable impacts on waters of the U.S. and wetlands; and
- Provided mitigation for unavoidable impacts.

National Flood Insurance Act/Flood Disaster Protection Act

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 were enacted by Congress to reduce the costs of disaster relief. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the NFIP to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues FIRMs of communities participating in the NFIP. These maps delineate flood hazard zones in the community. Local agencies are responsible for administering their community's floodplain management regulations. The City of Ukiah manages local storm drain facilities and is responsible for regional flood control planning within the city. Within the surrounding area, floodplain management and stormwater regulation are currently administered by Mendocino County in accordance with FEMA and NFIP requirements.

b. State Regulations

California Lake and Streambed Alteration Agreement

Sections 1600–1616 of the California Fish and Game Code require that any entity that proposes an activity that would divert or obstruct the natural flow of any river, stream or lake; change or use any material from the bed, channel, or bank of, any river, stream, or lake; or, deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, must notify the California Department of Fish and Wildlife. The California Department of Fish and Wildlife requires a Lake or Streambed Alteration Agreement if it determines that the alteration may adversely affect fish and wildlife resources. The Agreement includes conditions necessary to protect those resources. The Agreement applies to any stream, including ephemeral streams and desert washes.

Porter-Cologne Water Quality Control Act

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of the Clean Water Act in California. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface water and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous

substance, sewage, oil, or petroleum product. Each RWQCB must adopt and implement a Basin Plan for its region in conformance with the policies set forth in the Porter-Cologne Act. The proposed project area is within the jurisdictional boundaries of the NCRWQCB (Region 1).

Construction Stormwater General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies construction best management practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction Stormwater General Permit also contains post-construction requirements for projects not covered under a Phase I or Phase II MS4 Permit. The Construction Stormwater General Permit requires implementation of operational BMPs and low impact development features to reduce runoff and pollutants in stormwater discharge.

The Construction Stormwater General Permit also includes groundwater dewatering requirements for projects not covered under a De Minimis or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction Stormwater General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

California Drainage Law, Government Code 65302

Government Code Section 65302(a) requires cities and counties located within the state to review the Land Use, Conservation, and Safety elements of the general plan "for the consideration of flood hazards, flooding, and floodplains" to address flood risks. The code also requires cities and counties in the state to annually review the land use element within "those areas covered by the plan that are subject to flooding identified by floodplain mapping prepared by FEMA or the DWR."

c. Local Regulations

Mendocino County Low Impact Development Manual

The Mendocino County Low Impact Development (LID) Manual was adopted to implement stormwater management requirements under the County's MS4 permit and the federal NPDES program. The LID Manual establishes stormwater performance standards, design principles, and BMPs intended to manage runoff at its source by minimizing impervious surfaces, promoting infiltration, reducing runoff volumes and peak flows, and improving stormwater quality. These measures are intended to replicate pre-development hydrologic conditions to the extent feasible and to reduce erosion, pollutant loading, flooding, and hydromodification of receiving waters within the Russian River watershed and other County watersheds. The LID Manual applies to applicable development and redevelopment projects within unincorporated areas subject to the County's MS4 permit and is implemented through project-level permitting and review in coordination with County stormwater ordinances and Basin Plan requirements.

Mendocino County General Plan

The Mendocino County General Plan includes the following goals and policies related to hydrology and water quality within the Resources Management Element The following policies are applicable to the proposed project:

Goal RM-1. Land uses, development patterns, and practices that facilitate functional and healthy watershed ecosystems.

Goal RM-3. Land use development and management practices that protect or enhance water quality.

Policy RM-6. Promote sustainable management and conservation of the county's water resources.

Policy RM-7. Promote the incorporation of efficient indoor plumbing fixtures in new development and redevelopment. Where appropriate, promote drought-tolerant landscaping and the implementation of other water conservation best management practices.

Policy RM-19. Promote the incorporation of project design features that will improve water quality by minimizing impervious surface areas, maximizing on-site retention of stormwater runoff, and preserving existing vegetation to the extent possible. Examples include:

- Using Low Impact Development (LID) techniques.
- Updating the County's Building Codes to address "green" building and LID techniques that can reduce pollution of runoff water and promoting these techniques.

Policy RM-20. Require integration of stormwater best management practices, potentially including those that mimic natural hydrology, into all aspects of development and community design, including streets and parking lots, homes and buildings, parks, and public landscaping.

Ukiah 2040 General Plan

The Ukiah 2040 General Plan includes the following goals and policies related to hydrology and water quality within the Public Facilities, Services, and Infrastructure Element, and Environment and Sustainability Element. Relevant goals and policies include the following:

Goal PFS-2. To maintain quality wastewater treatment and disposal services to meet the needs of existing and future development.

PFS-2.7. The City shall preserve and protect groundwater quality through the implementation of best practices and innovative methods for modern wastewater disposal.

Goal PFS-5. To maintain an adequate stormwater management system to accommodate runoff and improve environmental quality.

Policy PFS-5.1. The City shall require new developments to install green infrastructure consistent with the Stormwater Low Impact Development Technical Design Manual and sustainable objectives of the State and the North Coast Regional Water Quality Control Board, including but not limited to pervious pavement, infiltration basins, raingardens, green roofs, rainwater harvesting systems, and other types of low impact development (LID).

Policy PFS-5.2. The City shall provide non-point source pollution control programs to reduce and control the discharge of pollutants into the storm drain system and Russian River.

Goal ENV-5. To conserve and protect the city's natural woodlands and water resources for future generations.

Policy ENV-4.6. The City shall require, for new development that could result in a significant reduction in groundwater recharge area or water quantity, an analysis, prepared by a licensed hydrologist, of the project impacts on groundwater recharge and quality.

Policy ENV-4.8. The City shall protect water quality from adverse impacts of urban and agricultural runoff.

Ukiah Valley Area Plan

The Ukiah Valley Area Plan (UVAP) is an element of the Mendocino County General Plan and provides detailed land use and resource protection policies for unincorporated areas within the Ukiah Valley, including areas proposed for annexation under the project. The UVAP contains the following goals and policies related to hydrology and water quality:

Goal WM3. Promote reclamation and conservation of water.

Policy WM3.1. Integrate urban water conservation Best Management Practices into community planning.

Goal WM4. Protect water quality by improving storm and wastewater management practices.

Policy WM4.1. Integrate storm water management practices that utilize and mimic natural hydrology into all aspects of development and community design, including streets and parking, homes and buildings, parks and public landscaping.

Ukiah Municipal Code

Chapter 7, Division 9 of the City of Ukiah Municipal Code establishes stormwater protection requirements intended to prevent the discharge of pollutants to the City's stormwater system and receiving waters. City Code provisions prohibit non-stormwater discharges to the stormwater system, except for specific categories of allowable discharges such as those authorized under a NPDES permit, certain uncontaminated water sources, and other discharges approved in writing by the RWQCB. The Municipal Code further prohibits any discharge that would result in or contribute to a violation of the City's stormwater NPDES permit and makes it unlawful to create, maintain, or use unauthorized drainage connections or pollutant-contributing connections to the stormwater system. Additional provisions require persons and entities whose activities may generate pollutants, including construction activities, parking areas, commercial and industrial uses, and properties adjacent to watercourses, to implement BMPs, prevent the discharge of wastes or debris, and maintain watercourses in a manner that minimizes pollution, erosion, and obstructions to flow. These requirements are implemented through City permitting, inspections, and enforcement mechanisms in coordination with applicable state and federal water quality regulations.

Water Quality Control Plan

The NCRWQCB has adopted a Basin Plan for the North Coast Region that establishes a comprehensive framework for protecting surface water and groundwater resources within its jurisdiction. The Basin Plan delineates hydrologic planning areas and designates beneficial uses for surface waters and groundwaters, including municipal supply, agricultural supply, recreation, aquatic habitat, and wildlife habitat. To protect these beneficial uses, the Basin Plan establishes narrative and numeric water quality objectives that must be attained or maintained and identifies implementation programs, including prohibitions, action plans, and policies designed to achieve water quality objectives. The Basin Plan also describes regional monitoring activities, procedures for public participation, and the framework for regulating waste discharges through permitting and enforcement. Consistent with State Water Resources Control Board policies, including the State Antidegradation Policy (Resolution No. 68-16), the Basin Plan serves as the foundation for Regional Water Board regulatory programs and is used by state and local agencies in permitting and resource management decisions that may affect water quality within the region.

Groundwater Sustainability Plan

SGMA requires GSAs to prepare GSPs for groundwater basins designated as high- or medium-priority by the DWR. The Ukiah Valley Groundwater Basin is designated as a medium-priority basin and is managed by the UVBGSA under the adopted Ukiah Valley Groundwater Basin GSP. The purpose of the GSP is to achieve and maintain sustainable groundwater management by 2042 and thereafter by avoiding "undesirable results," which are defined by SGMA to include chronic lowering of groundwater levels, significant and unreasonable reductions in groundwater storage, degraded groundwater quality, land subsidence, and depletions of interconnected surface water that adversely affect beneficial uses. The GSP establishes basin-specific sustainability goals, monitoring objectives, and management criteria, informed by technical studies and stakeholder engagement, to guide long-term groundwater management and ensure groundwater resources can be managed and used sustainably over the planning and implementation horizon.

4.2.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, an impact related to hydrology and water quality would be significant if the project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    a. Result in substantial erosion or siltation on- or off-site
    b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
    c. 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
    d. Impede or redirect flood flows

4. Risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

Methodology

Project impacts to hydrology and water quality are evaluated based on the project's adherence to local, state, and federal standards; the nature of proposed soil disturbance, construction activities, and groundwater dewatering during construction; the change in land use and proposed operational activities; changes in pre- and post-project stormwater flows; and proposed operational BMPs for control of surface runoff and reduction of pollutants in stormwater runoff.

b. Prior Environmental Analysis

Hydrology and water quality conditions within the proposed project area have been evaluated in several previously certified environmental documents, including the City of Ukiah 2040 General Plan EIR, the Mendocino County General Plan Update EIR, and the UVAP EIR. These documents provide programmatic analyses of water quality, groundwater supply and recharge, drainage patterns, erosion and sedimentation, surface runoff, and flood hazards within the Ukiah Valley and surrounding areas.

Ukiah 2040 General Plan EIR

Hydrology and water quality are addressed in Chapter 4.16, *Effects Found Not to Be Significant*, of the Ukiah 2040 General Plan EIR. The General Plan EIR determined that implementation of the Ukiah 2040 General Plan would result in less-than-significant impacts related to water quality, groundwater supplies and recharge, drainage patterns, erosion or siltation, surface runoff, and flood hazards. These conclusions are based on the nature of proposed land use changes, compliance with applicable regulations, and the application of adopted General Plan policies. No mitigation measures specific to hydrology or water quality were required.

Mendocino County General Plan EIR

Hydrology and water quality are analyzed in Chapter 4.8 (Hydrology and Water Quality) of the County General Plan EIR. The County EIR evaluated potential impacts related to surface water and groundwater quality, groundwater recharge, drainage patterns, erosion, stormwater runoff, and flood hazards at a countywide scale. The EIR concluded that these impacts would be less than significant with implementation of existing regulatory requirements and adopted General Plan policies addressing water resource protection and flood management. No project-specific mitigation measures were identified.

Ukiah Valley Area Plan EIR

Hydrology and water quality are discussed in Chapter 2.2 (Hydrology and Water Quality) of the UVAP EIR. The UVAP EIR determined that impacts related to water quality, groundwater conditions, and dam inundation hazards would be less than significant with implementation of existing policies and measures. However, the EIR identified potentially significant impacts associated with increased flooding and stormwater runoff resulting from development anticipated under the UVAP. The UVAP EIR identified mitigation measures related to flood management planning, stormwater management, streambank protection, and avoidance of development in flood-prone areas to reduce these impacts to less than significant levels.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-1 The proposed project would not include development and would not violate water quality standards, waste discharge requirements, or conflict with regulatory compliance. No impact would occur.

The proposed project is limited to jurisdictional and regulatory actions and would not authorize new development, increase development intensity, expand infrastructure capacity, modify allowable land uses, or reduce minimum parcel sizes within the proposed annexation areas. As a result, no new sources of stormwater runoff, wastewater discharge, or groundwater extraction would be introduced, and existing drainage patterns and groundwater recharge conditions would remain unchanged.

In addition, the proposed project would involve a change in service responsibility and regulatory oversight for water and wastewater services within annexed areas but would not result in physical modifications to water supply infrastructure, wastewater facilities, or stormwater systems. Existing water quality standards, discharge requirements, and groundwater protection provisions would continue to apply following annexation, and service provision by the City of Ukiah would be subject to the same or more stringent state and regional regulatory frameworks, including compliance with applicable NPDES and MS4 permit requirements and Basin Plan standards administered by the NCRWQCB. Accordingly, the transfer of service responsibility would not result in changes to water quality conditions, hydrologic processes, or groundwater management practices.

Although the project itself would not authorize development, future development proposals within annexed areas would be subject to project-specific discretionary review and compliance with applicable NPDES and MS4 permit requirements, Chapter 7 of the Ukiah Municipal Code establishing stormwater discharge prohibitions and pollution prevention requirements, and Basin Plan requirements administered by the NCRWQCB.

Implementation of the proposed project would not conflict with or impede implementation of adopted water quality control and groundwater management programs, including the Basin Plan for the North Coast Region and the Ukiah Valley GSP adopted pursuant to SGMA. The proposed project would also be consistent with applicable water quality and groundwater protection policies of the Mendocino County General Plan, including Policies RM-6 and RM-19, the City of Ukiah 2040 General Plan, including Policies PFS-2.7, PFS-5.1 and PFS-5.2, and ENV-4.6, and the UVAP Policy WM3.1 which establish requirements and performance standards for protecting surface and groundwater quality, managing stormwater and wastewater discharges, and ensuring development would not degrade water resources or conflict with adopted water quality control and groundwater management plans. Because the project would not authorize development or involve physical changes, it would not conflict with or obstruct implementation of these policies. Future development within the annexation areas would be subject to project-specific discretionary review and would be required to comply with all applicable City, County, and state water quality and groundwater protection policies.

Previous environmental review documents, including the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, evaluated water quality impacts associated with development potential under existing land use and zoning designations, including impacts related to stormwater runoff, wastewater discharges, and groundwater quality. Those documents concluded that, with implementation of applicable regulations and policies, impacts related to water quality would be less than significant. The proposed project would not increase development potential, authorize new development, or modify development assumptions evaluated in the prior EIRs. As a result, the project would not result in new or more severe water quality impacts than those previously analyzed. Therefore, there would be no

direct impacts of the proposed project related to compliance with water quality standards, waste discharge requirements, and adopted water quality control or groundwater management plans. Impacts associated with development potential evaluated in the applicable program-level EIRs would remain less than significant. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 2:	Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 The proposed project would not authorize new development, would not increase groundwater demand or alter groundwater extraction, recharge or management. Therefore, it would not substantially decrease groundwater supplies or interfere with groundwater recharge or sustainable groundwater management of the basin. No impact would occur.

The proposed project would not involve construction, grading, land disturbance, or physical modification of surface or subsurface conditions. As such, groundwater recharge areas, infiltration capacity, and hydrologic connections between surface water and groundwater resources in the Ukiah Valley would remain unchanged.

The proposed project would not authorize new development, increase development intensity, expand water service capacity, or modify allowable land uses or site development standards within the proposed annexation areas. Accordingly, the proposed project would not increase groundwater extraction or introduce new demands on groundwater supplies. Existing groundwater use associated with current land uses would remain unchanged and would continue to be regulated under applicable local, regional, and State groundwater management and water quality requirements. Although the proposed project would involve a change in water service responsibility following annexation, it would not authorize increased groundwater pumping, change groundwater sources, or affect existing private well use or groundwater availability for neighboring properties. The proposed project area is located within the Ukiah Valley Groundwater Basin (DWR Basin Number 1-052), a medium-priority basin managed by the UVGSA pursuant to the adopted Ukiah Valley GSP prepared in accordance with SGMA. Groundwater management would continue under the GSP, with groundwater quality regulated by the NCRWQCB Basin Plan and Waste Discharge Requirements, and local implementation through Chapter 7 of the Ukiah Municipal Code and stormwater LID requirements following annexation.

The proposed project would also be consistent with applicable groundwater protection and water conservation policies of the Mendocino County General Plan, including Policy RM-6, and the City of Ukiah 2040 General Plan, including Policies PFS-2.7 and ENV-4.6, as well as UVAP Policy WM3.1. These policies require sustainable management and conservation of groundwater resources, protection of groundwater recharge areas, implementation of water conservation best management practices, and evaluation of groundwater impacts for projects that could affect water quantity or recharge, consistent with sustainable groundwater management objectives. Because the proposed project would not authorize development or physical changes affecting groundwater recharge or demand, it would not conflict with or obstruct implementation of these policies. Future development within the annexation areas would be subject to project-specific discretionary review and would be required to comply with all applicable City, County, and state water quality and groundwater protection policies.

The proposed project would not involve physical changes affecting infiltration, would not increase groundwater demand, and would not modify development assumptions used in basin-wide groundwater planning. Therefore, it would not contribute to adverse groundwater conditions or SGMA-defined

undesirable results, including groundwater overdraft, reduced groundwater storage, degraded groundwater quality, land subsidence, or depletion of interconnected surface waters.

Groundwater supply, recharge, and sustainable groundwater management associated with development allowed under existing land use and zoning designations were previously evaluated in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR. Those analyses accounted for groundwater demand projections and groundwater management through adopted regulations and the Ukiah Valley GSP and concluded that impacts would be less than significant. The proposed project would not authorize new development, increase groundwater demand, or alter development assumptions used in basin-wide groundwater planning. As such, groundwater supply and recharge conditions would remain consistent with those evaluated in prior environmental reviews. Therefore, the proposed project would not result in groundwater impacts that are more severe than those previously analyzed, and there would be no impacts related to groundwater supply, recharge, and sustainable groundwater management. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures are required.

Mitigation Measures

No mitigation measures would be required.

Threshold 3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

a. Result in substantial erosion or siltation on- or off-site?
b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
c. 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
d. Impede or redirect flood flows?

Impact HYD-3 The proposed project would not authorize development or physical changes to drainage features and would not result in modification to drainage infrastructure or operations. Therefore, it would not substantially alter drainage patterns or result in erosion, flooding, exceedance of stormwater system capacity, or redirection of flood flows. No impact would occur.

The proposed project would not involve construction, grading, vegetation removal, land disturbance, or physical modification of surface drainage features. As such, the proposed project would not alter topography, modify creeks or drainage channels, change floodplain conditions, or introduce new impervious surfaces within the annexation areas.

The proposed project would not authorize development, increase development intensity, or modify allowable land uses or site development standards. As a result, the project would not increase surface runoff, alter drainage patterns, introduce new erosion or sediment sources, or create new sources of polluted runoff. Existing drainage systems, stormwater infrastructure, and flood control facilities would continue to function as they do under current conditions, and although the proposed project would involve a change in stormwater service responsibility following annexation, it would not alter the physical capacity, operation, or maintenance of these facilities.

Annexation of territory into the City of Ukiah would not change the physical capacity or operation of existing stormwater infrastructure. Future development within annexed areas would be subject to project-specific discretionary review and required to comply with Chapter 7 of the Ukiah Municipal Code, LID requirements, NPDES and MS4 permit conditions, and the Basin Plan. These regulations would ensure that future projects avoid or minimize erosion, flooding, pollutant discharges, and impacts to flood flows.

The proposed project would be consistent with applicable drainage and stormwater management policies of the Mendocino County General Plan, including Policies RM-19 and RM-20, the City of Ukiah 2040 General Plan, including Policies PFS-5.1 and PFS-5.2 and Policy ENV-4.8, and the UVAP, including Policies WM4.1 which govern how development is designed to manage runoff, minimize impervious surfaces, control erosion and sedimentation, maintain stormwater system capacity, and avoid adverse changes to drainage patterns and flood flows. Because the project would not authorize development or physical changes affecting drainage or runoff, it would not conflict with or obstruct implementation of these policies. Although annexation would involve a change in stormwater service responsibility following annexation, it would not alter the physical capacity, operation, or regulatory requirements applicable to drainage and stormwater systems. Future development within the annexation areas would be subject to project-specific discretionary review and would be required to comply with all applicable City, County, and state water quality and groundwater protection policies.

Hydrology, drainage, runoff, and flooding impacts resulting from buildout under existing land use and zoning designations were previously evaluated in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR. Those documents concluded that drainage and flooding impacts associated with anticipated development would be less than significant through compliance with stormwater regulations and flood management requirements. The proposed project would not authorize development, alter drainage patterns, increase impervious surfaces, or modify floodplain conditions, and would not increase the development potential analyzed in the prior EIRs. Accordingly, the proposed project would not result in drainage, runoff, or flooding impacts that are more severe than those previously disclosed. Therefore, there would be no direct impact of the proposed project related to erosion, flooding, stormwater system capacity, or redirection of flood flows. Impacts associated with development potential evaluated in prior environmental reviews would remain less than significant. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures are required.

Mitigation Measures

No mitigation measures would be required.

Threshold 4:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-4 The proposed project would not authorize development or introduce new pollutant sources within flood hazard areas and would not result in physical changes to facilities or operations that could increase the risk of pollutant release due to flooding, tsunami, or seiche inundation. No impact would occur.

Special Flood Hazard Areas designated as Zone A and Zone AE are present in multiple locations throughout the city. These areas are generally associated with creek corridors, agricultural lands, and low-lying developed areas, including portions of western, central, northern, and southwestern Ukiah, as well as adjacent unincorporated lands. FEMA-designated Special Flood Hazard Areas are also present in portions of the surrounding unincorporated areas within the City's Sphere of Influence, particularly along the Russian River corridor and associated tributaries (FEMA 2025). However, the proposed project would not involve construction, land disturbance, or placement of new structures, facilities, or hazardous materials within flood hazard areas. The project would not introduce new sources of pollutants that could be mobilized during flooding events.

The proposed project area is located inland within the Russian River Valley and is not located within a mapped tsunami inundation area (DOC 2026). In addition, the proposed project area would not contain large natural or engineered reservoirs that could generate seiche hazards. Therefore, the project would not be exposed to tsunami or seiche-related inundation risks.

Annexation and pre-zoning would not alter existing land uses or introduce industrial, commercial, or hazardous material uses beyond those already allowed under existing Mendocino County regulations. Following annexation, properties would be subject to Chapter 7 of the Ukiah Municipal Code, regulating stormwater discharges, pollutant control, and hazardous materials management, as well as applicable federal and State requirements.

The proposed project would also be consistent with applicable water quality and runoff control policies of the Mendocino County General Plan, including Policies RM-19 and RM-20, and the City of Ukiah 2040 General Plan, including Policies PFS-5.2, and PFS-2.7 which regulate land uses, stormwater discharges, and pollutant controls in areas subject to flooding, and are intended to prevent the release of pollutants to surface water and groundwater during inundation events. Because the proposed project would not authorize development or introduce new pollutant sources in flood-prone areas, it would not conflict with or obstruct implementation of these policies. Future development within the annexation areas would be subject to project-specific discretionary review and would be required to comply with all applicable City, County, and state water quality and groundwater protection policies.

Prior environmental review for the Ukiah 2040 General Plan, Mendocino County General Plan, and UVAP evaluated risks associated with flooding and inundation of developed areas, including the potential mobilization of pollutants during flood events. Those analyses concluded that, with adherence to land use controls and stormwater and hazardous materials regulations, impacts would be less than significant. The proposed project would not authorize development, place new structures or pollutant sources within flood hazard areas, or increase development potential beyond that evaluated in previous EIRs. In addition, the proposed project area is not located within tsunami or seiche hazard zones. Therefore, the proposed project would not result in increased risk of pollutant release due to inundation. Thee project would not result in new or substantially more severe than those evaluated in prior environmental reviews. Accordingly, there would be no impacts related to flooding-related pollutant release, tsunami, or seiche hazards. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures are required.

Mitigation Measures

No mitigation measures would be required.

4.2.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative hydrology and water quality impacts is the Ukiah Valley Watershed, including the Russian River and associated tributaries, and the Ukiah Valley Groundwater Basin. This geographic scope is appropriate because surface water quality effects would occur within the same watershed system, and groundwater-related effects would affect basin-wide groundwater conditions managed under the Ukiah Valley GSP.

Past, present, and reasonably foreseeable future development within the cumulative study area includes development consistent with existing land use and zoning designations under the City of Ukiah 2040 General Plan, the Mendocino County General Plan, and the UVAP. Cumulative development has the potential to increase impervious surface area, alter drainage patterns, increase stormwater runoff, reduce groundwater recharge, and introduce pollutants to surface and groundwater resources.

However, the proposed project would consist of annexation, detachment, and application of pre-zoning consistent with existing County land use designations. The proposed project would not authorize development, increase allowable development intensity, expand infrastructure capacity, or change development assumptions evaluated in previously certified environmental documents. As such, the proposed project would not directly contribute to cumulative hydrology or water quality impacts through construction activity, increased impervious surfaces, new drainage alterations, increased groundwater

demand, or changes in groundwater extraction or management associated with a transfer of water service responsibility.

Cumulative development within the Ukiah Valley Watershed and Groundwater Basin would continue to be regulated under a comprehensive framework of federal, State, regional, and local requirements designed to protect water quality and manage hydrologic conditions. These include, but are not limited to, the NCRWQCB Basin Plan, the NPDES Construction and MS4 permit programs, the Ukiah Valley GSP adopted pursuant to SGMA, and applicable City of Ukiah Municipal Code provisions and Ukiah 2040 General Plan policies related to stormwater management, groundwater protection, and flood hazard avoidance. Future discretionary development projects would be required to comply with stormwater low-impact development requirements, erosion and sediment control measures, pollutant discharge limitations, groundwater sustainability objectives, and floodplain management regulations.

Hydrology and water quality impacts associated with cumulative development consistent with adopted land use plans were previously evaluated in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, including consideration of flood hazards, stormwater runoff, groundwater supply and recharge, and water quality protection. Those analyses concluded that, with implementation of applicable regulations, policies, and mitigation measures, cumulative hydrology and water quality impacts would be less than significant.

Because the proposed project would not increase development potential, modify the regulatory framework governing cumulative development, or result in changes to groundwater, stormwater, or flood management practices associated with a transfer of water or stormwater service responsibility, its incremental contribution to cumulative hydrology and water quality effects would not be cumulatively considerable. Therefore, there would be no cumulative impacts related to surface water quality, groundwater supply and recharge, drainage patterns, flooding, and pollutant discharges.

4.3 Land Use (and Planning)

This section summarizes the City's land use characteristics, including the overall land use pattern and major land use type, and analyzes the impacts related to land use and planning due to the project.

4.3.1 Setting

City limits and Sphere of Influence terms used in this EIR are defined below:

- **City Limits.** The political boundary that defines land that has been incorporated into a city. Ukiah has land use authority over all land within its city limits.
- **Sphere of Influence.** The Local Agency Formation Commission (LAFCo) establishes the Sphere of Influence (SOI), which defines the probable physical boundary and service area of a local agency. An SOI typically includes both incorporated and unincorporated areas within which the city will have primary responsibility for the provision of public facilities and services.

Existing Setting

The City of Ukiah encompasses approximately 3,071 acres, with residential development comprising roughly one-third of the incorporated area. The city's existing land use pattern is shaped by surrounding topography, the Russian River corridor, and the regional and local transportation network, including U.S. Highway 101 and major arterial streets. Urban development within the city limits consists of established residential neighborhoods, downtown commercial and mixed-use areas, highway-oriented commercial development, industrial and employment areas, public and institutional uses, parks, and open space.

Unincorporated areas proposed for annexation are located along the City's outer boundaries and represent a transitional setting between urban and rural land uses. These areas are currently governed by the Mendocino County General Plan and, where applicable, the Ukiah Valley Area Plan (UVAP). These planning documents designate land uses that include various residential densities, commercial and industrial uses, public facilities, agricultural lands, and open space. County zoning classifications applied to these areas are generally consistent with the County General Plan and UVAP land use designations.

Existing Zoning in Ukiah

Zoning within the City of Ukiah is regulated pursuant to Ukiah Municipal Code Division 9, Chapter 2, which establishes a series of zoning districts specifying land uses that are permitted, conditionally permitted, or prohibited within each district. These zoning regulations implement the City of Ukiah 2040 General Plan Land Use Element and apply to all lands within the city limits.

The City has fourteen zoning districts, which include residential, commercial, industrial, public, and planned development classifications. Existing zoning districts within the city are summarized below to provide context for the zoning framework that would be applied through the proposed project.

- **Residential Zoning Districts (R1, R2, R3).**The R1, R2, and R3 zoning districts allow residential development ranging from low-density hillside single-family development to higher-density multifamily housing. The Hillside Overlay (-H) district applies to certain R1 lands within the western hills and includes additional development standards to address slope, access, and visual impacts. Collectively, residential zoning districts comprise a substantial portion of the developed area within the city limits, particularly on the west side of Ukiah.
- **Commercial and Industrial Zoning Districts.** Commercial and industrial zoning districts include Manufacturing (M), Community Commercial (C1), Heavy Commercial (C2), and Neighborhood Commercial (CN). These zones accommodate retail, service, office, and employment-generating uses and are generally located west of U.S. Highway 101 and along North and South State Street.

Commercial and industrial zones collectively represent an important component of the City's employment base and service-oriented development pattern.

- **Public Facilities (PF) Zoning District**. The PF zoning district includes lands occupied by City-owned and publicly operated facilities, including civic buildings, parks, public utility facilities, and the Ukiah Municipal Airport. The PF district represents a significant share of land area within the city limits and supports essential municipal services and infrastructure.
- **Planned Development (PD) Zoning Districts.** PD zoning districts exist for both residential and commercial uses. These districts are intended to provide flexibility in site planning and design beyond the standard zoning requirements, allowing innovative development approaches and customized standards through an adopted development plan.

Most of the land within the proposed project area is currently designated for agricultural use, and agricultural (AG) zoning districts. The application of AG zoning would be consistent with existing County land use designations and zoning standards and would not modify allowable land uses, development intensity, or site development regulations.

Agricultural zoning districts currently applied within the project area allow for:

- Ongoing agricultural uses, including crop production, grazing, and other forms of agricultural operation.
- Accessory structures and uses customarily related to agricultural activities, such as barns, equipment storage, and similar facilities.
- Limited residential uses that are ancillary to agricultural operations and consistent with low-density development standards established by the County.
- Constraints on non-agricultural uses that would otherwise introduce urban levels of development intensity.
- Retention of AG zoning would reflect existing land use entitlements and development patterns within the project area. Annexation would not result in a change to agricultural zoning, permitted uses, or development potential on these parcels..

Existing Zoning in Mendocino County

Land use within unincorporated Mendocino County is regulated pursuant to Mendocino County Municipal Code Title 20, which establishes zoning districts specifying land uses that are permitted, conditionally permitted, or prohibited within each district. These zoning regulations implement the Mendocino County General Plan Development Element land use designations, and apply to lands outside incorporated city boundaries.

The County's zoning framework is applied in conjunction with General Plan land use designations, which establish allowable uses, residential densities, and minimum parcel sizes. Zoning districts are mapped on official County zoning maps and regulate site development standards such as lot size, setbacks, and allowable intensity of development. Existing zoning and land use categories are summarized below to provide context for the regulatory framework applicable to the proposed project area.

- **Residential and Mixed-Use Zoning Districts (SR, RR, RMR, RC, MU).** Residential zoning ranges from Suburban Residential (SR), allowing higher-density development near communities, to Rural Residential (RR) and Remote Residential (RMR), which allow low-density housing in more rural areas. Rural Community (RC) and Mixed Use (MU) designations allow a mix of residential, commercial, and small-scale employment uses, typically in unincorporated towns or along transportation corridors.
- **Commercial and Industrial Zoning Districts (C, I).** Commercial and industrial zoning districts accommodate retail, service, office, and manufacturing uses. These zones are generally located near developed areas and along transportation corridors and support the County's employment base.
- **Agricultural and Resource Zoning Districts (AG, RL, FL).** Much of the County is zoned for agricultural and resource uses, including Agricultural Lands (AG), Range Lands (RL), and Forest Lands (FL). These

districts allow agricultural production, grazing, and timber operations, along with limited residential uses at very low densities, and emphasize large parcel sizes to protect long-term resource use.

- **Public, Open Space, and Public Service Districts (PL, OS, PS).** Public Lands (PL), Open Space (OS), and Public Services (PS) districts apply to lands used for public facilities, infrastructure, or environmental protection. Development is generally limited to uses that support public services or resource conservation.

Most lands within the project area are designated and zoned for agricultural and/or resource use. Agricultural zoning districts allow for:

- Ongoing agricultural operations, including crop production, grazing, and timber-related uses;
- Accessory structures and uses related to agricultural or resource activities;
- Limited residential development at low densities consistent with large minimum parcel sizes; and

Restrictions on non-agricultural development that would introduce urban levels of intensity or conflict with resource preservation. Retention of existing zoning would be consistent with current land use designations and would not alter allowable uses or development intensity within the proposed project area.

4.3.2 Regulatory Setting

a. State Regulations

California Government Code

California Government Code Section 65300 regulates the substantive and topical requirements of general plans. State law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." The California Supreme Court has called the general plan the "constitution for future development." The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private.

California Government Code Section 65301 requires a general plan to address the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to the planning of the jurisdiction. The jurisdiction may exercise their own judgment in determining what areas outside of its boundaries to include in the Planning Area. The State of California General Plan Guidelines state that the Planning Area for a city should include (at minimum) all land within the city limits and all land within the city's Sphere of Influence.

Cortese Knox Hertzberg Local Government Reorganization Act of 2000

The Cortese Knox Hertzberg Local Government Reorganization Act (CKH Act) is the most significant reform to local government reorganization law since the 1963 statute that created a LAFCo in each county. The law established procedures for local government changes of organization, including city incorporation, annexation to a city or special district, and consolidation of cities or special districts (California Government Code Section 56000, et seq.). LAFCos have numerous powers under the CKH Act, but those of prime concern are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. The law also states that in order to update a Sphere of Influence, LAFCOs are required to first conduct a review of the municipal services provided in the county.

While LAFCo does not have any direct land use authority, the CKH Act assigns LAFCos a significant role in planning issues by requiring them to consider a wide range of land use and growth factors when they consider proposals. California Government Code Section 56001 specifically states that "the logical formation and determination of local agency boundaries is an important factor in promoting orderly

development and in balancing that development with sometimes competing State interests of discouraging urban sprawl, preserving open space and prime agricultural lands, [and] efficiently extending government services."

The CKH Act also requires LAFCos to update spheres of influence for every city and special district every five years. The original deadline was January 2006, five years following the CHK Act becoming State law. That deadline was extended two years to January 2008. As such, LAFCos now conduct ongoing, cyclical updates to for SOI's to remain current and reflect existing conditions, planned growth, and service capabilities. Every SOI update must be accompanied by an update of the municipal services review. Pursuant to Government Code Section 56430, Mendocino LAFCo conducts municipal service reviews for each agency under its jurisdiction. The municipal service reviews provide an in-depth look at provider service needs, use of resources, and possibilities for partnership with other agencies; and contain determinations that serve as guidelines to inform and support the LAFCo's decisions about SOIs. Mendocino County LAFCo and the City of Ukiah are currently in the process of updating the Municipal Service Review and Sphere of Influence for the City. These processes are occurring concurrently with preparation of this EIR; LAFCo can use this EIR to adopt the proposed SOI.

b. Regional and Local Regulations

Mendocino County General Plan

The Mendocino County General Plan (County General Plan) governs land use and development within the unincorporated areas of Mendocino County. The County General Plan establishes land use designations, development policies, and implementation standards for residential, commercial, industrial, agricultural, public service, and open space land uses across the County.

Within the Ukiah Valley, the County General Plan is supplemented by the UVAP, which provides area-specific policy guidance addressing land use compatibility, growth patterns, agricultural preservation, natural resource protection, and the relationship between incorporated and unincorporated communities. The UVAP serves as an important planning tool for lands that are urban-adjacent or located within municipal spheres of influence.

Development within unincorporated areas is regulated through County zoning districts that implement the General Plan and UVAP land use designations. These zoning regulations establish permitted uses, development intensity, site development standards, and procedural requirements applicable to new development and land use changes prior to annexation

Ukiah Valley Area Plan

The Ukiah Valley Area Plan (UVAP) includes the following goals and policies related to land use and planning that would apply to the project:

Goal LU1. Create compact, mixed-use, and well-balanced communities that can achieve this plan's principles of sustainability.

Goal LU7. Recognize that the Ukiah Valley is one community, and foster collaborative decision-making between County and City Agencies.

> **Policy LU 7.1.** Collaborate with the City of Ukiah to fund programs and evaluate planning issues in the Valley.

City of Ukiah 2040 General Plan

The City of Ukiah 2040 General Plan is the primary policy document governing land use, development, and provision of public services within the City of Ukiah. Adopted in December 2022, the Ukiah 2040 General Plan establishes a comprehensive framework for growth, infrastructure investment, resource protection, and community development through the year 2040.

The Land Use Element of the Ukiah 2040 General Plan designates land use categories for all parcels within the city limits and identifies the general distribution, location, and intensity of land uses, including residential, commercial, industrial, public, recreational, and mixed-use development.

The Ukiah 2040 General Plan also establishes policies supporting orderly growth, efficient provision of municipal services, coordination with regional and County planning efforts, and alignment with the City's adopted SOI. Amendments to the Ukiah 2040 General Plan are subject to discretionary review and environmental analysis pursuant to CEQA.

Ukiah Zoning Districts

The City of Ukiah Zoning Ordinance (Division 9, Chapter 2) contains 14 zoning districts (including two combining/overlay districts). Each zoning district has developed standards that are designed to protect and promote the health, safety, and general welfare of the community and to implement the policies of the Ukiah 2040 General Plan. The zoning districts only apply to land within the city limits and the standards serve to preserve the character and integrity of existing neighborhoods. Within a typical district there are regulations related to land use, lot size, coverage, setbacks, building heights, parking, and landscaping.

The 14 zoning districts established by the Ukiah Zoning Ordinance are:

- Residential Districts
  - Low Density Residential (R-1)
  - Medium Density Residential (R-2)
  - High Density Residential (R-3)
- Commercial Districts
  - Neighborhood Commercial (C-N)
  - Community Commercial (C-1)
  - Heavy Commercial (C-2)
- Industrial Districts
  - Manufacturing (M)
- Agricultural Districts
  - Agricultural Exclusive (A-E)
- Public Districts
  - Public Facilities (PF)

Mendocino County Zoning Districts

The Mendocino County Zoning Ordinance (Title 20) establishes a range of zoning districts that implement the Mendocino County General Plan. These zoning districts are intended to protect public health, safety, and welfare, while preserving the County's rural character and natural resource base. The zoning districts apply to lands within the unincorporated County and include standards for allowable land uses, parcel size, density, setbacks, building height, parking, and site design.

Mendocino County zoning districts generally correspond to General Plan land use designations and are organized into residential, commercial, industrial, agricultural/resource, and public categories, which include:

- Residential Districts
  - Suburban Residential (SR)
  - Rural Residential (RR – including variations such as RR-1, RR-2, RR-5, RR-10)

- Remote Residential (RMR)

- Mixed-Use Community Districts
  - Rural Community (RC)
  - Mixed Use (MU)
- Commercial Districts
  - Commercial (C)
- Industrial Districts
  - Industrial (I)
- Agricultural and Resource Districts
  - Agricultural Lands (AG)
  - Range Lands (RL)
  - Forest Lands (FL)
- Public and Special Purpose Districts
  - Public Lands (PL)
  - Open Space (OS)
  - Public Services (PS)
  - Tribal Lands (TL)

4.3.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

Based on Appendix G of the CEQA Guidelines a project may be deemed to have a significant impact on land use and planning if it would:

1. Physically divide an established community; or
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Methodology

The analysis in this section focuses on the compatibility of land uses identified in Ukiah 2040 General Plan with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental impacts. This section also analyzes whether development facilitated by the project, or its proposed policies would physically divide communities.

b. Prior Environmental Analysis

Land use and planning conditions within the proposed project area have been evaluated in multiple previously certified environmental documents, including the Ukiah 2040 General Plan EIR, the Mendocino County General Plan Update EIR (County General Plan Update EIR), and the Ukiah Valley Area Plan (UVAP) EIR. These documents provide programmatic analyses of land use patterns, growth assumptions, zoning consistency, agricultural and urban land use transitions, and growth-inducing effects within the City of Ukiah, the City's SOI, and the surrounding unincorporated areas of Mendocino County.

Ukiah 2040 General Plan EIR

Land use and planning impacts are evaluated in Chapter 4.7 (Land Use and Planning) of the Ukiah 2040 General Plan EIR. The EIR assessed whether implementation of the General Plan would conflict with applicable land use plans, divide existing communities, or induce unplanned growth. The General Plan EIR concluded that land use and planning impacts would be less than significant, as the General Plan provides a comprehensive framework for future development that is internally consistent and coordinated with regional and County planning efforts. The Ukiah 2040 General Plan EIR further concluded that anticipated annexations and changes to jurisdictional boundaries evaluated under the General Plan would not result in land use conflicts, provided that annexed areas are prezoned consistently with existing land use designations and development standards. No mitigation measures were required for land use and planning impacts.

Mendocino County General Plan Update EIR

Land use and planning are addressed in Chapter 4.9 (Land Use, Population, and Housing) of the County General Plan Update EIR. The County EIR evaluated potential impacts related to land use compatibility, conversion of agricultural and rural lands, division of established communities, and consistency with adopted plans. The EIR determined that, at a countywide level, implementation of the General Plan Update could result in changes to land use patterns and conversion of agricultural and rural lands; however, these impacts were found to be less than significant due to the application of County land use designations, zoning regulations, Right-to-Farm provisions, and comprehensive General Plan policies. The County General Plan Update EIR acknowledged that land use changes and growth would be managed through zoning and discretionary review processes, and no additional mitigation measures for land use and planning were identified beyond compliance with adopted policies and County Code provisions.

Ukiah Valley Area Plan EIR

Land use and planning issues are discussed primarily in Chapter 3.1 (Land Use) and Chapter 4.0 (Growth-Inducing Impacts) of the UVAP EIR. The UVAP EIR analyzed land use changes anticipated under the Area Plan, including future conversion of agricultural lands to urban uses, potential agricultural-urban interface conflicts, and growth-inducing characteristics associated with expanded development opportunities in the Ukiah Valley. The UVAP EIR concluded that certain land use impacts, including agricultural land conversion and growth-inducing effects, would be significant and unavoidable at a programmatic level due to the long-term buildout assumptions of the Area Plan. The EIR identified mitigation measures intended to minimize land use conflicts, buffer agricultural uses, and guide orderly development; however, some impacts were determined to remain significant and unavoidable due to the scale of anticipated growth.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project physically divide an established community?

Impact LU-1 Implementation of the project would maintain orderly development in the planning area and would not physically divide an established community. No impact would occur.

Most of the lands within and immediately adjacent to the City of Ukiah are currently developed with urban, suburban, and rural uses. Within the city limits, development consists primarily of established residential neighborhoods, commercial corridors, industrial and employment areas, public facilities, and parks. Development patterns in surrounding unincorporated areas reflect a transition from urban to rural land uses and are governed by existing County land use designations and zoning standards intended to maintain compatibility and continuity among uses.

Unincorporated lands adjacent to the city limits are regulated by the Mendocino County General Plan and, where applicable, the Ukiah Valley Area Plan. These plans establish land use designations, development

intensity limits, and policy guidance intended to avoid fragmented development patterns and the physical division of established communities.

As part of the project's Pre-Zone Component, the City would apply City land use designations and zoning districts to annexed parcels that would mirror existing County land use and zoning designations. This approach would maintain existing allowable uses, density, and site development regulations following annexation. No changes to permitted land uses, no increase in development potential, and no growth-inducing land use changes would occur as a result of the proposed project. The project is limited to jurisdictional and service reorganization and would not include physical development, infrastructure construction, or circulation improvements that could divide an established community.

The following City of Ukiah 2040 General Plan goals and policies are applicable to the consideration of whether land use actions could physically divide an established community:

Goal LU-7. Orderly Growth and Expansion. Ensure orderly and timely growth and expansion of the City in a manner that reinforces existing development patterns and community cohesion.

> **Policy LU-7.1: Development Pattern.** Require orderly, contiguous development patterns that prioritize infill development, encourage compact and efficient land use, preserve open space and agricultural resources, and avoid land use incompatibilities.

Goal LU-8: Quality of Life and Resource Protection. Promote growth and development practices that improve quality of life and protect environmental, natural, and community resources.

> **Policy LU-8.1: Contiguous Development.** Discourage development that is not contiguous with existing urban development.
>
> **Policy LU-8.3: Infill Development.** Encourage population and employment growth to occur on infill sites within existing developed areas.

Goal LU-10: Coordination with Special Planning Areas. Assure coordination and consistency with special planning areas and regional planning efforts.

> **Policy LU-10.2: Ukiah Valley Community.** Recognize the Ukiah Valley as a single community and foster coordinated decision-making among the City, Mendocino County, and other public agencies.
>
> **Policy LU-10.3: Ukiah Valley Area Plan.** Coordinate with Mendocino County to ensure consistency with the goals and policies of the Ukiah Valley Area Plan.

The Mendocino County General Plan, including the Ukiah Valley Area Plan, contain complementary policies that emphasize orderly development, land use compatibility, coordination between jurisdictions, and efficient public service provision within the Ukiah Valley. These County policies are intended to reinforce established settlement patterns and avoid actions that would physically separate or disrupt existing neighborhoods.

The proposed project is a reorganization of jurisdictional boundaries and service territories, with no residential, commercial, or infrastructure development proposed, it would not involve construction or land use changes that could physically divide an established community. Therefore, no impact would occur. The proposed project would not result in new or substantially more severe significant impacts to land use beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 2:	Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 Implementation of the project would be generally consistent with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects, therefore, no impact would occur.

Several regional and local land use plans, policies, and regulations provide the planning context relevant to jurisdictional boundary changes and municipal service reorganization within and adjacent to the City of Ukiah. These plans establish the regulatory structure under which land use authority, service provision, and interjurisdictional coordination are carried out but do not themselves authorize development or changes in land use intensity.

The Mendocino County General Plan governs land use and development within unincorporated areas of Mendocino County. It establishes land use designations, development policies, and implementation standards for residential, commercial, industrial, agricultural, public service, and open space land uses. Development within unincorporated areas is implemented through County zoning regulations that set forth permitted uses, development intensity, site development standards, and procedural requirements applicable prior to annexation.

The proposed project would not introduce new or different land use designations; rather, the existing County land use and zoning designations would be maintained through the pre-zoning component of the project and would remain consistent with the Ukiah Valley Area Plan. As such, the project represents a continuation of the existing land use framework rather than a change in planned land use.

The Ukiah 2040 General Plan Land Use Element includes goals and policies that promote infill development, redevelopment, and efficient use of land while avoiding urban sprawl and land use conflicts. These policies are consistent with the Mendocino County General Plan and the Ukiah Valley Area Plan, which together establish a coordinated and overlapping planning framework for the Ukiah Valley. Implementation of these goals and policies would ensure that future development remains compatible with surrounding uses and does not result in inconsistencies with applicable land use plans. Additional discretionary or ministerial review would be required should future development be proposed in the annexation area. Future development proposed in the annexation area would be subject to City standards. As the proposed project would not include proposals for development in the annexation area, existing County standards would continue to be maintained. The project would not result in new or more severe land use impacts beyond those previously analyzed in the certified environmental impact reports applicable to the project area.

Because the project would maintain existing land use designations and apply consistent planning frameworks, it would not divide an established community or create land use conflicts. State law governing changes to local governmental boundaries is established by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, which sets forth procedures and criteria for annexations, detachments, and reorganizations involving cities and special districts. Therefore, assigning responsibility to the Mendocino Local Agency Formation Commission to review such proposals in order to promote orderly development, preserve agricultural and open space lands, discourage urban sprawl, and ensure the efficient delivery of public services. Although the Cortese-Knox-Hertzberg Local Government Reorganization Act does not confer land use authority to LAFCo, it requires consideration of land use plans, service efficiency, and growth-related factors when evaluating jurisdictional changes.

Under the reorganization, annexed lands would be pre-zoned to reflect existing Mendocino County land use designations and zoning standards. This approach would maintain existing allowable uses, densities, and development regulations following annexation and would not authorize land use changes, expanded development capacity, or new infrastructure. The reorganization is administrative in nature and would not involve physical development or land use modification.

Overall, the applicable City, County, and State regulatory frameworks emphasize coordinated planning, efficient service provision, preservation of existing community patterns, and alignment between land use authority and municipal service responsibility. The proposed project would operate within this framework and would not introduce land use conflicts or development actions; therefore, no impact would occur to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project would not result in new or substantially more severe significant impacts to land use beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

4.3.4 Cumulative Impacts

The geographic scope for the cumulative land use and planning analysis is the Ukiah Valley and surrounding unincorporated areas of Mendocino County, where jurisdictional boundaries and municipal services are coordinated among the City of Ukiah, the County, and other public agencies.

The proposed project would not authorize physical development, infrastructure construction, or changes in land use intensity. The proposed project would not include roads, utility corridors, or other linear facilities that could disrupt neighborhood connectivity or physically divide an established community. Other past, present, and reasonably foreseeable actions in the cumulative study area generally consist of site-specific development or infrastructure maintenance projects subject to discretionary review by the appropriate jurisdiction.

Land use decisions for cumulative projects required to be consistent with applicable City or County General Plans and zoning regulations, emphasizing orderly development patterns, land use compatibility, and protection of established neighborhoods. Because neither the proposed project nor other cumulative actions would introduce physical barriers or land use changes that could separate communities, there would be no cumulative land use and planning impacts related to the division of an established community.

4.4 Utilities and Service Systems

This section analyzes the effects of the proposed project on utilities and service systems. It considers potential impacts with respect to water supply and infrastructure, wastewater conveyance and treatment facilities, stormwater and drainage facilities, solid waste disposal, and electricity, natural gas, and telecommunications facilities

4.4.1 Setting

The following section describes the existing setting with respect to wastewater treatment providers, water suppliers, stormwater drainage facilities, solid waste facilities, electricity and natural gas providers, and telecommunications facilities serving the project alignment.

Water

The City of Ukiah's Department of Public Works provides water (primarily sourced from wells) to much of the city. The City of Ukiah draws its water from the Russian River and four active groundwater wells that draw water from the Ukiah Valley Groundwater Basin (City of Ukiah 2020a, City of Ukiah 2020b). Groundwater wells account for approximately 55 percent of the City's potable water.

According to annual water quality testing report, the City of Ukiah's water quality is safe and reliable (City of Ukiah 2020a). The City's water service area comprises nearly 100 percent of the population residing within the city limits, with a small amount (less than 1 percent) of City residents being served by other water providers (City of Ukiah 2020b).

Millview County Water District provides water to north Ukiah and an unincorporated area bordering the city to the north. Willow County Water District provides water to south Ukiah and an unincorporated area bordering the city to the south. All three agencies are expected to adequately meet existing and future demands for water, including in the event of a dry year or multiple dry years (City of Ukiah 2020b).

In addition to community water systems, parcels and residents within unincorporated areas of the City's Sphere of Influence (SOI) rely on private domestic wells for potable water supply. Private wells are common in rural and low-density areas outside city limits and are regulated by Mendocino County in accordance with County General Plan policies and environmental health requirements (County of Mendocino 2026). These private water systems operate independently of the City's municipal water system.

Wastewater

Ukiah's Department of Public Works provides wastewater collection and treatment for approximately two-thirds of the city and operates its own wastewater treatment plant (WWTP). A separate agency, the Ukiah Valley Sanitation District (UVSD) serves the remaining portions of Ukiah, as well as communities in the existing SOI. Operated by the City, one WWTP serves both the city and UVSD. The City's 2020 UWMP identifies that the WWTP has a dry-weather capacity of 3.01 million gallons per day (mgd) and that in 2020, the WWTP collected a total of 2,671 acre-feet per year (AFY), which is equivalent to 2.4 mgd. In unincorporated areas within the SOI, wastewater service conditions differ from those within city limits. Many residents and properties in the SOI are not connected to centralized wastewater collection systems and instead rely on individual private wastewater disposal systems, such as septic systems, consistent with Mendocino County standards for rural and low-density development (City of Ukiah 2020a). These private systems are regulated by the County Environmental Health Division and operate independently of the City's WWTP.

Stormwater Drainage

Stormwater discharges consist of surface water runoff generated from various land uses. The quality of these discharges varies and is affected by geology, land use, season, hydrology, and sequence and duration of hydrologic events. The Ukiah Department of Public Works manages the storm drainage system within the city. According to the 2022 Municipal Services Review, the capacity of the stormwater drainage system is unknown (Ukiah 2022a). Much of the city's stormwater is conveyed by surface flow along curbs and gutters. There are intermittent storm drains throughout the city; however, there is no central trunk line for all the storm drains to collect and convey stormwater to the Russian River. Within the City's SOI, stormwater drainage infrastructure is generally limited and varies by location. Unincorporated areas within the SOI are primarily served by roadside ditches, culverts, swales, and natural drainage features maintained by Mendocino County or, where applicable, Caltrans along state highways. These areas generally lack centralized or interconnected storm drain systems and rely on surface conveyance and natural infiltration consistent with rural and low-density development patterns.

Electricity and Natural Gas

Ukiah has its own Electric Utility Department that provides service to residents in the city. The City's Electric Utility Department is a municipally owned utility that maintains its own power-generating capabilities, such as the 3.5 Megawatt Lake Mendocino Hydroelectric Plant, which is one of the city's major sources of electricity (Ukiah 2022b).

The city is within Pacific Gas & Electric's (PG&E) natural gas service area (City of Ukiah 2020a). Nearly 45 percent of the natural gas burned in California was used for electricity generation, and much of the remainder consumed in the residential (21 percent), industrial (25 percent), and commercial (9 percent) sectors (California Energy Commission [CEC] 2026). Mendocino County consumed approximately 9.321 million US therms (the smallest scale at which natural gas consumption data is readily available) in 2024 (CEC2024).

Telecommunications

In California, approximately 98 percent of households have access to telecommunication infrastructure, including telephone and cable access (California Cable & Telecommunications Association 2026). Broadband and cellular services are provided to residents and businesses from a variety of private companies, including national retailers Comcast, AT&T, Verizon, and Sprint.

Solid Waste and Recycling

Ukiah contracts its solid waste, recycling, and composting to the private company C&S Waste Solutions. Solid waste is transported to the Ukiah Valley Transfer Station, located at 3151 Taylor Drive in Ukiah. Unincorporated areas are served by Waste Management. According to California Department of Resources Recycling and Recovery (CalRecycle) the maximum permitted capacity for the Ukiah Transfer Station is 400 tons per day (CalRecycle 2026a). CalRecycle does not report an estimated capacity closing date for the facility.

4.4.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental

Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

Section 402 of the Clean Water Act requires that municipal, industrial and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable.
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community.
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 Code of Federal Regulations Section 144).
4. Regulate distribution systems.

Title 40 of the Code of Federal Regulations

Title 40 of the Code of Federal Regulations, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Star Program

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (USEPA 2026).

Telecommunications Act

In 1996, the Federal Communications Commission (FCC) passed the Telecommunications Act, allowing any communications business to compete in any market against any other business. This act affects

telephone service, cable programming, and other video services, including broadcast services and services provided to schools (FCC 2026).

b. State Regulations

Water and Wastewater

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the California Department of Water Resources.

California Department of Water Resources

The California Department of Water Resources is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

Urban Water Management Planning Act

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an UWMP at least once every five years and submit them to the California Department of Water Resources. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the State until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

Porter-Cologne Water Quality Control Act (California Water Code)

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code Section 13000, *et seq*.) includes provisions to address requirements of the Clean Water Act. These provisions include NPDES permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State.

In California, the NPDES program is administered by the SWRCB through the RWQCB and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The federal Clean Water Act prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an NPDES permit. The SWRCB is the permitting authority in California, and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Order applies to construction sites that include one or more acres of soil disturbance. Construction activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving

removal or replacement. The Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction and then pay a fee annually through the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMP) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

Title 22 of California Code of Regulations

Title 22 regulates the use of reclaimed wastewater. In most cases only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced below ground and will not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops.

The California Department of Public Health sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations. These requirements are primarily set to protect public health. The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered jointly by the California Department of Public Health and the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Electricity and Natural Gas

California Energy Commission

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California.

California Public Utilities Commission

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2026).

Senate Bill *350*

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Solid Waste

California Department of Resources Recycling and Recovery

The California Department of Resources Recycling and Recovery (CalRecycle) oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including Assembly Bill (AB) 939 and SB 1016, both of which are described below.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 341 – Mandatory Commercial Recycling

The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

c. Local Regulations

Municipal Stormwater Permitting Program

RWQCBs issue stormwater discharge permits. The Phase I Municipal Separate Storm Sewer System (MS4) (Order R1-2015-0030) is applicable to the City of Ukiah in the North Coast Region RWQCB (RWQCB 2026). The MS4 programs implement and enforce BMPs to reduce the discharge of pollutants from municipal separate storm sewer systems. The MS4 requires the City to establish monitoring programs for outfalls, receiving water, and chronic toxicity.

Ukiah Valley Basin Groundwater Sustainability Agency

In 2017, the City came together with the County of Mendocino and other Ukiah Valley agencies to form the Ukiah Valley Basin Groundwater Sustainability Agency (UVBGSA). The UVBGSA was created by a Joint Powers Agreement to serve as the official Groundwater Sustainability Agency for the Ukiah Valley Basin required by the Sustainable Groundwater Management (SGMA) Act of 2014.

City of Ukiah 2040 General Plan

The City of Ukiah 2040 General Plan provides the policy framework governing the provision and long-term planning of municipal utilities and public services within the city limits. The Public Facilities, Services, and Infrastructure Element addresses water supply, wastewater collection and treatment, stormwater management, solid waste services, energy, and municipal facilities. This Element establishes policies to ensure that public services and utilities are provided efficiently, maintain adequate service levels, and are aligned with land use planning and growth management objectives.

Mendocino County General Plan

The Mendocino County General Plan governs utilities and public services within unincorporated areas of the County. County policies address water supply, wastewater systems, stormwater management, solid waste disposal, and other public services, with an emphasis on ensuring adequate capacity, protecting public health, and coordinating service provision with land use designations.

County General Plan policies support orderly transitions of service responsibility where annexation or reorganization occurs and encourage coordination between the County, cities, and special districts to ensure efficient and cost-effective delivery of utilities. Utility services within unincorporated areas are implemented through County departments and special districts, subject to applicable regulatory requirements and service standards.

Ukiah Valley Area Plan

The Ukiah Valley Area Plan (UVAP), together with the Mendocino County General Plan, includes goals and policies related to utilities and service systems. The following goals and policies emphasize orderly growth, infrastructure efficiency, and the coordination of public services with land use planning to avoid premature or unnecessary expansion of facilities:

- **WM1**: Promote efforts that protect and increase water supply storage and capacity
  - WM1.1: Maintain and increase water supplies and systems for existing and future water system needs.
  - WM1.1a Identify Water Sources Cooperate and coordinate with the City of Ukiah, LAFCO, the Water Agency, and local water districts in the provision of infrastructure and services within the Ukiah Valley.
  - WM1.1c Water Rights Expansion Identify Russian River system water rights that may be available to support development of new land uses in the Valley

4.4.3 Impact Analysis

a. Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, a significant utilities impact would occur if new development facilitated by the proposed project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
3. 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;
4. 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; or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Methodology

This analysis considers the existing capacity of utilities serving the city, estimates qualitatively and quantitively the potential additional demand on utilities, and identifies whether the existing system can serve the demand of the existing demand plus the project's estimated demand.

Prior Environmental Analysis

Utilities and service systems within the proposed project area have been evaluated in multiple previously certified environmental documents, including the Ukiah 2040 General Plan EIR, the Mendocino County General Plan Update EIR, and the UVAP EIR. These documents provide program-level analyses of water supply, wastewater treatment and collection, stormwater drainage, solid waste management, and energy and telecommunications infrastructure within the City of Ukiah, the City's Sphere of Influence, and surrounding unincorporated areas of Mendocino County. Collectively, these documents establish the environmental baseline and growth assumptions applicable to the proposed reorganization project.

Ukiah 2040 General Plan EIR

Utilities and service systems are analyzed in Chapter 4.13 (Utilities and Service Systems) of the Ukiah 2040 General Plan EIR. The General Plan EIR evaluated impacts related to water supply adequacy, wastewater treatment capacity, stormwater drainage facilities, solid waste generation and disposal, and the provision of electricity, natural gas, and telecommunications services. The EIR concluded that implementation of the General Plan would result in less-than-significant impacts related to utilities and service systems, provided that development complies with adopted General Plan policies, infrastructure planning requirements, and applicable state and local regulations.

The Ukiah 2040 General Plan EIR determined that projected growth under the General Plan would be accommodated by planned water supply sources and wastewater treatment capacity, and that no new or expanded utilities infrastructure would be required beyond what is contemplated in adopted plans and capital improvement programs. No mitigation measures were required for utilities and service systems, as impacts were determined to be less than significant.

Mendocino County General Plan Update EIR

Utilities and service systems are addressed in Chapter 4.14 (Utilities and Service Systems) of the Mendocino County General Plan Update EIR. The County EIR evaluated potential impacts associated with water supply, wastewater disposal, solid waste facilities, and dry utilities resulting from development permitted under the County General Plan. The analysis concluded that impacts related to wastewater disposal, solid waste, and dry utilities would be less than significant with implementation of adopted County policies.

The County General Plan Update EIR identified potentially significant and unavoidable impacts related to long-term water supply availability at a countywide, programmatic level, based on projected growth and cumulative demand. These conclusions were based on conservative assumptions regarding buildout across Mendocino County and included areas outside the City of Ukiah and its Sphere of Influence. The

County EIR did not identify mitigation measures beyond compliance with adopted policies, water conservation measures, and coordination with water service providers.

Ukiah Valley Area EIR

Utilities and service systems are discussed in Chapter 3.10 (Public Services and Infrastructure) of the Ukiah Valley Area Plan EIR. The UVAP EIR analyzed the potential for growth envisioned under the UVAP to affect water supply, wastewater treatment capacity, and other utility services within the Ukiah Valley. The UVAP EIR concluded that buildout of the UVAP could result in significant and unavoidable impacts related to water supply and wastewater treatment capacity, based on growth-inducing land use changes and assumptions that exceed existing service constraints.

The UVAP EIR included mitigation measures aimed at coordinating infrastructure planning, promoting conservation, and managing growth; however, due to the scale of potential development anticipated under the plan, certain utility impacts were determined to remain significant and unavoidable at the programmatic level.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project 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?

Impact UTIL-1 The proposed project would not increase demand for water, wastewater, electric power, natural gas, telecommunications, or stormwater drainage facilities. The proposed project is administrative in nature and would not facilitate or authorize development or infrastructure expansion. Therefore, no impact would occur.

The proposed project would not require or result in the construction or relocation of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities.

The proposed project consists of the reorganization of jurisdictional boundaries and municipal service territories within the City's existing Sphere of Influence and the pre-zoning of annexed unincorporated areas to reflect existing County standards. The proposed project would not authorize new residential or non-residential development, would not increase development intensity, and would not establish a growth or buildout program. As a result, the proposed project would not create additional demand for utilities beyond existing conditions.

No development is proposed or would be facilitated by the proposed project. As such, expansion of water supply infrastructure, wastewater treatment capacity, stormwater drainage systems, or energy and telecommunications facilities would not be required. Existing water, wastewater, and stormwater systems would continue operating under current service conditions, with service provision adjusted administratively where annexation occurs. Any future connections to utility systems would be limited to development already permitted under existing County or City entitlements and would remain subject to separate discretionary review and project-level CEQA analysis.

The Pinoleville Rancheria area would not be included in the proposed reorganization areas; however, the City would coordinate with the Pinoleville Rancheria regarding the continued provision of City services in order to maintain existing levels of service currently being provided. This coordination would be administrative in nature and would not involve construction or expansion of utility infrastructure beyond existing conditions.

Similarly, implementation of the proposed project would not require construction of new electric power, natural gas, or telecommunications infrastructure. Utility providers would continue to operate existing

facilities, and no new trunk lines, substations, pipelines, or communication facilities would be proposed as part of the proposed project. Any future utility upgrades unrelated to the proposed project would be implemented independently and would undergo individual environmental review as required.

With respect to stormwater drainage, the proposed project would not alter drainage patterns or require construction or expansion of stormwater facilities. Because no grading, construction, or land disturbance is proposed as part of the proposed project, there would be no change in runoff characteristics attributable to project implementation. Existing stormwater regulations would continue to apply to future development proposals.

The City of Ukiah General Plan includes policies in the Public Facilities, Services, and Infrastructure Element that guide utility planning toward efficiency, resilience, and sustainability, including improving infrastructure performance, promoting energy conservation, encouraging undergrounding of utilities where feasible, and requiring low-impact development practices for stormwater management. The following applicable policies provide guidance for utility planning and service provision within the city:

Goal PFS-1. To maintain a safe and adequate water system to meet the needs of existing and future development.

> **Policy PFS-1.1: Water Service Annexation Impacts.** The City shall ensure newly annexed areas within the city do not negatively affect water services to existing customers
>
> **Policy PFS-1.3: Consolidation of Water Districts.** The City shall support the consolidation of water districts as part of future annexations to establish efficient services and ensure adequate water supply and delivery.
>
> **Policy PFS-1.4: Water Storage.** The City shall encourage the protection and expansion of existing sources and methods of water storage for future development.
>
> **Policy PFS-2.4: Ukiah Valley Sanitation District.** The City should collaborate with Ukiah Valley Sanitation District to ensure adequate wastewater collection and treatment is provided to properties within City limits and their jurisdictional boundaries.
>
> **Policy PFS-2.5: Out of Area Service Agreements.** The City shall require out of service area agreements in rural areas where the Ukiah Valley Sanitation District cannot feasibly provide wastewater services.

While these policies would apply to future development projects, they are not triggered by, nor would they be implemented as part of, the proposed project.

The proposed project is administrative in nature and does not include or facilitate physical development, it would not require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, there would be no impacts related to utilities and service systems. The project would not result in new or substantially more severe significant impacts to utilities and service systems beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 The proposed project would not increase water demand because it would not facilitate or authorize development. Water demand would remain consistent with existing conditions, and no expansion of water supply infrastructure would be required. Therefore, no impact would occur

The proposed project would not facilitate future growth or development and therefore would not create additional demand for potable water supplies within the City of Ukiah or the annexed areas. The proposed project is administrative in nature and is limited to the reorganization of jurisdictional boundaries and municipal service territories within the City's existing Sphere of Influence, along with the pre-zoning of annexed unincorporated lands to maintain existing County land use designations and zoning standards.

The proposed project would not authorize residential or non-residential development, would not increase development intensity, and would not establish a growth or buildout scenario. As such, no new water demand was calculated using water demand factors or modeling tools, and no assumptions regarding future growth were made for the purposes of this analysis. Water demand within the city and annexed areas would continue to be governed by the growth assumptions and buildout scenarios established in the City of Ukiah General Plan, the Mendocino County General Plan, and the UVAP EIR. Under the proposed project, water demand would remain consistent with existing conditions. Any demand would be limited to development already permitted under existing City or County land use entitlements. Further, as discussed in the City of Ukiah General Plan EIR, growth under the City of Ukiah General Plan accounted for potential growth and expansion of the SOI. As determined in the City of Ukiah General Plan EIR, water supply would be sufficient to accommodate estimated growth in the city and the SOI. The proposed project would not introduce new growth beyond that evaluated in the City of Ukiah General Plan EIR and the UVAP EIR. The proposed project would operate within these adopted planning frameworks and would not modify, expand, or accelerate growth beyond what has already been contemplated and evaluated in those documents.

Although annexation would result in a change in service provider for certain areas, the reorganization would not require expansion of water supply sources, construction of new water treatment facilities, or increased water deliveries. Existing water systems would continue to operate within their current capacity, and service realignment would occur administratively. Any future development proposals within annexed areas would be subject to separate discretionary review and project-level CEQA analysis to evaluate water supply availability and infrastructure capacity at that time.

The City of Ukiah General Plan includes policies that guide long-term water system planning, conservation, and service efficiency to ensure reliable water supplies for existing customers and any future development that may occur independently of the proposed project. As described in Impact UTIL-1 policies would continue to apply following annexation but are not activated by the proposed reorganization itself. In addition, the Pinoleville Rancheria area would not be included in the proposed reorganization areas; however, the City would coordinate with the Pinoleville Rancheria regarding the continued provision of City water services in order to maintain existing levels of service currently being provided. This coordination would be administrative in nature and would not require expansion of water supply infrastructure or result in increased water demand.

Because the proposed project would not increase water demand, modify land use patterns, or induce growth, it would not adversely affect the City's water supply or distribution system. Accordingly, the proposed project would not result in impacts to the City's water supply or distribution system. The project would not result in new or substantially more severe significant impacts to water supply beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 3:	Would the project 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?

Impact UTIL-3 The proposed project would not increase demand for wastewater treatment or require expansion of wastewater facilities. The project is administrative in nature and would not authorize development. Therefore, no impact would occur.

The proposed project would not result in increased wastewater generation or additional demand on wastewater collection, treatment, or disposal facilities. The proposed project would not facilitate new residential or non-residential development, would not increase development intensity, and would not establish a growth or buildout scenario. As a result, no wastewater generation calculations based on projected water demand or land use assumptions were required for this analysis, as the proposed project does not introduce new growth forecasts, modify adopted buildout scenarios, or alter the growth assumptions established in the City of Ukiah General Plan, the Mendocino County General Plan, or the Ukiah Valley Area Plan EIR.

Implementation of the proposed project would involve the administrative realignment of wastewater service responsibilities within annexed areas but would not require expansion of wastewater treatment capacity, construction of new wastewater facilities, or modification of existing wastewater infrastructure. As part of the reorganization, the City would annex a portion of the Ukiah Valley Sanitation District, and once statutory thresholds are met, the Sanitation District would be established as a subsidiary district of the City. This action would consolidate governance and service responsibility while continuing wastewater collection and treatment using the existing facilities operated by the City. In areas not served by centralized wastewater systems, including portions of the SOI, properties relying on private wastewater disposal systems (e.g., septic systems) would continue to operate as currently permitted and regulated, with no changes required as a result of the proposed project. Existing wastewater flows would remain consistent with current conditions and permitted land use entitlements. Wastewater service to annexed areas would continue under existing service arrangements, with jurisdictional responsibility adjusted as appropriate.

As the proposed project would not authorize development or increase wastewater flows, the Ukiah Valley Wastewater Treatment Plant would not experience increased loading attributable to the reorganization. Any future development proposals within annexed areas that could generate additional wastewater would be subject to separate discretionary review and project-level CEQA analysis to evaluate wastewater generation, collection system capacity, and treatment plant capacity at the time such development is proposed.

The City of Ukiah Public Facilities, Services, and Infrastructure Element of the General Plan includes policies that guide long-term wastewater planning and coordination to ensure continued service reliability and regulatory compliance. Relevant policies include the following:

Goal PFS-2. To maintain quality wastewater treatment and disposal services to meet the needs of existing and future development.

> **Policy PFS-2.1: Level of Service.** The City shall maintain an adequate level of service in the City's wastewater collection, treatment, and disposal system to meet the needs of existing and projected development and all State and Federal regulations.
>
> **PolicyPFS-2.3: Wastewater Service Coordination.** The City shall coordinate with the Ukiah Valley Sanitation District to ensure ongoing wastewater treatment capacity within the wastewater treatment plant for future development.

Policy PFS-2.4: Ukiah Valley Sanitation District. The City should collaborate with Ukiah Valley Sanitation District to ensure adequate wastewater collection and treatment is provided to properties within City limits and their jurisdictional boundaries.

Policy PFS-2.5: Out of Area Service Agreements. The City shall require out of service area agreements in rural areas where the Ukiah Valley Sanitation District cannot feasibly provide wastewater services. PFS-2.6 Wastewater Service Capacity. The City shall ensure there is adequate wastewater service capacity prior to annexation of additional land.

These policies address maintaining adequate levels of service, ensuring sufficient funding for wastewater infrastructure, coordinating with the Ukiah Valley Sanitation District regarding treatment capacity, and verifying service availability prior to annexation or approval of development. While these policies establish a framework for future infrastructure planning, they are not triggered by the proposed reorganization project, as no new demand would be created.

The proposed project would not increase wastewater generation, require expansion of wastewater treatment facilities, or induce development, therefore it would not result in adverse environmental impacts related to wastewater treatment or disposal. Accordingly, there would be no impact to wastewater facilities. The project would not result in new or substantially more severe significant impacts to wastewater facilities beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

Threshold 4:	Would the project 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?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-4 The proposed project would not increase the volume of solid waste generated in Ukiah or annexed areas because it would not facilitate or authorize development. The proposed project is administrative in nature and would not result in the generation of construction or operational waste. Therefore, no impact would occur.

The proposed project would not result in increased solid waste generation and would not require expanded solid waste disposal capacity. The proposed project would not authorize residential, commercial, industrial, or infrastructure development and would not include construction activities. As such, no construction-related debris, operational municipal solid waste, or industrial waste would be generated as a result of implementation of the proposed project.

Because the proposed project would be limited to the reorganization of jurisdictional boundaries and municipal service responsibilities related to water and wastewater only, solid waste generation levels within the City of Ukiah and annexed areas would remain consistent with existing conditions and with levels already permitted under existing land use entitlements. C&S Waste Solutions through two franchise waste haulers, Ukiah Waste Solutions and Redwood Waste Solutions, provides solid waste collection and recycling to the city of Ukiah and its SOI. These services would continue to be provided by existing providers under current service arrangements for five years after annexation under the existing franchise agreement. After five years, the franchise waste hauler for the annexation area may be adjusted from Redwood Waste Solutions to Ukiah Waste Solutions.

The Ukiah Transfer Station currently operates below its permitted daily capacity, and existing solid waste management facilities have sufficient capacity to accommodate solid waste generated under existing conditions. Because the proposed project would not increase population, change land use intensity, or facilitate new development, it would not increase the amount of waste requiring disposal at local or regional facilities.

Any future development proposals within annexed areas that could generate additional solid waste would occur independently of the proposed project and would be subject to separate discretionary review and project-level CEQA analysis. Such analysis would evaluate solid waste generation and disposal capacity at the time development is proposed and would ensure compliance with applicable federal, state, and local solid waste management regulations.

The City of Ukiah Public Facilities, Services, and Infrastructure Element of the General Plan includes policies that promote waste reduction, recycling, composting, and diversion of solid waste through compliance with CALGreen requirements and other waste-management practices.

Goal PFS-3. To ensure adequate solid waste, recycling, and composing services and maximize waste diversion from landfills.

> **Policy PFS-3.2: Waste Management Services.** The City shall continue waste management service contracts to provide quality and cost-effective solid waste removal throughout the city and require all residents and businesses to comply with solid waste collection and recycling service requirements.

These policies provide a framework for future development but are not triggered by the proposed project, as no development is proposed.

Because the proposed project would not generate solid waste or increase demand on disposal facilities, it would not result in impacts related to solid waste generation and disposal. The project would not result in new or substantially more severe significant impacts to solid waste beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, Mendocino County General Plan Update EIR, and UVAP EIR, nor present new information that shows impacts would be more significant than those described in the prior certified EIRs. Pursuant to CEQA Guidelines Sections 15162(a)(3) and 15163(a), no additional mitigation measures or further environmental analysis would be required.

Mitigation Measures

No mitigation measures would be required.

4.4.4 Cumulative Impacts

The geographic scope for cumulative analysis of utilities and service systems varies by utility type and is generally defined by the service area of the applicable utility provider and associated infrastructure. The cumulative analysis considers past, present, and reasonably foreseeable actions within the City of Ukiah and surrounding unincorporated areas of Mendocino County, in combination with implementation of the proposed project. Because the proposed project is administrative in nature and would not authorize development, the cumulative analysis focuses on whether reorganization, when considered alongside other actions, would result in cumulatively considerable impacts to utilities or service systems.

Water

The geographic scope for cumulative water impacts includes the City of Ukiah water service area and adjacent unincorporated areas currently served by local water districts. This scope is appropriate because water supply, treatment, and distribution are managed at the local level and cumulative demands are evaluated within existing service boundaries.

The proposed project would not increase water demand, as it would not authorize new development or intensification of land uses. Existing water supply, treatment, and distribution systems would continue to operate under current conditions following reorganization, with responsibility for service provision

transitioning administratively to the applicable City water agency or subsidiary district where annexation occurs. Existing and reasonably foreseeable projects in the cumulative study area are subject to separate discretionary review to ensure that adequate water supplies are available prior to approval. Because the proposed project would not add demand and existing regulatory processes ensure water availability for other cumulative projects, there would be no cumulative impacts to water supply, and the proposed project's contribution would not be cumulatively considerable.

Wastewater

The geographic scope for cumulative wastewater impacts encompasses areas served by the Ukiah Valley wastewater collection and treatment system. This scope is appropriate because wastewater flows from multiple jurisdictions are conveyed to shared treatment facilities.

The proposed project would not increase wastewater generation, as it does not facilitate new development. Wastewater collection and treatment operations would continue using existing facilities and capacities, though service responsibility would be adjusted administratively where reorganization or annexation occurs, such as through establishment of a city subsidiary sanitation district. Existing and future projects in the cumulative study area that could generate additional wastewater are required to demonstrate adequate conveyance and treatment capacity and would undergo project-level CEQA review if system expansions or upgrades are needed. Because the proposed project would not add wastewater flows and planning for wastewater capacity is addressed through separate regulatory processes. As such, there would be no cumulative impact related to wastewater facilities, and the proposed project would not contribute cumulatively.

Stormwater

The geographic scope for cumulative stormwater impacts includes the City's stormwater drainage service area and adjacent unincorporated areas subject to County stormwater regulations. This scope captures areas where runoff management and water quality protection are regulated through municipal and regional programs.

The proposed project would not alter drainage patterns or increase impervious surfaces and therefore would not contribute to increased stormwater runoff. Existing stormwater drainage systems and regulatory frameworks would remain in place following reorganization, with operations and maintenance continuing under the appropriate City or County authority as jurisdictional boundaries change. Cumulative projects involving physical development are required to comply with applicable stormwater permitting requirements and low-impact development standards. Because the proposed project would not involve construction or land disturbance and cumulative projects are regulated to address stormwater impacts, there would be no cumulative stormwater impacts, and the proposed project's contribution would not be cumulatively considerable.

Electric Power, Natural Gas, and Telecommunications

The geographic scope for cumulative impacts related to electric power, natural gas, and telecommunications encompasses the service territories of existing utility providers serving the Ukiah area. These services are planned and operated on a service-area basis to ensure reliability and capacity.

The proposed project would not increase energy or telecommunications demand, as it would not authorize development or population growth. Any future infrastructure upgrades required to serve cumulative development would be implemented independently by utility providers and subject to applicable regulatory oversight and environmental review. Because the proposed project would not add demand or require new facilities, there would be no cumulative impacts to electric power, natural gas, and telecommunications systems, and the proposed project would not contribute cumulatively.

Solid Waste

The geographic scope for cumulative solid waste impacts includes areas contributing waste to local solid waste management facilities serving Ukiah and surrounding areas. This scope is appropriate because disposal capacity and diversion programs are addressed regionally.

The proposed project would not generate solid waste, as it would not include construction or operational activities. Other cumulative projects that generate solid waste are subject to state and local waste diversion requirements and are served by facilities with available permitted capacity. Because the proposed project would not increase waste generation and solid waste facilities are planned to accommodate regional needs, there would be no cumulative impacts related to solid waste, and the proposed project's contribution would not be cumulatively considerable.

5 Other CEQA Required Discussions

This section discusses effects found not to be significant, growth inducement, and irreversible environmental impacts, that would be caused by the proposed project.

5.1 Effects Found Not to be Significant

Pursuant to CEQA Guidelines Section 15128, an EIR must contain a brief discussion of the reasons that various impacts were determined not to be significant, and therefore not discussed in detail in the EIR. The proposed project was evaluated against CEQA Guidelines Appendix G criteria. As a result of that evaluation, several environmental resource areas were eliminated from further analysis. A summary of these resource areas and why they were eliminated from further analysis follows below.

5.1.1 Aesthetics and Visual Resources

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on aesthetics and visual resources. Would the project:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
3. 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
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

Proposed Project Impacts

While the proposed project would result in changes to the City's Sphere of Influence (SOI) and annexation of Millview, Willow, and Sanitation District territory, the proposed project would include pre-zoning and land use designations for the annexation areas that would be consistent with the current land use designations provided in the County's General Plan and the Ukiah Valley Area Plan. The proposed project would not facilitate development beyond what was considered in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR. Development that occurs within the project area would be designed in compliance with City design guidelines that address building materials, height limitations, parking, and pedestrian orientation, among other aspects. Therefore, the proposed project would not result in any impacts to aesthetics and visual resources not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.2 Air Quality

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on air quality. Would the project:

1. Conflict with or obstruct implementation of the applicable air quality plan
2. 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
3. Expose sensitive receptors to substantial pollutant concentrations
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

Proposed Project Impacts

The proposed project would change the City's SOI and city limits; however, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the proposed project, which would be consistent with the Ukiah Valley Area Plan. Therefore, the proposed project would not result in new or increased amounts of construction or density, and therefore no corresponding increase in short- or long-term emissions compared to what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR. The proposed project would not involve land use changes, new development, or construction activities. As such, the project would not generate emissions typically associated with development projects, such as construction-related dust, equipment exhaust, or long-term emissions from new land uses. Operational emissions associated with the addition of four police officers would be limited to a minor increase in patrol vehicle use. However, this incremental increase would be negligible as police patrol activities are part of an existing, citywide service system. The addition of four police officers would primarily redistribute patrol coverage or enhance response capacity, rather than create entirely new travel demand. Any incremental increase in fuel consumption and tailpipe emissions (e.g., NOx, ROG, PM10, and PM2.5) from a small number of additional patrol vehicles would be negligible and below applicable regional air quality significance thresholds and would be somewhat offset by the change of need from sheriff patrol vehicles to Ukiah Police Department vehicles in the portions currently served by Sonoma County Sheriff. Therefore, the proposed project would not result in additional impacts to air quality not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.3 Biological Resources

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on biological resources. Would the project:

1. 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 Wildlife or U.S. Fish and Wildlife Service
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means
4. 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
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional habitat for special-status species, riparian habitat, wetlands, and other sensitive natural communities may occur within the city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. The proposed project would not result in new or increased amounts of construction and therefore, would not result in potential to impact special-status species. The proposed project would not result in new or increased conversion or loss of habitat, wetlands, or riparian and other sensitive natural communities compared to what was concluded in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR. Similarly, as the proposed project would not change the location of the land uses envisioned in the Ukiah 2040 General Plan, Mendocino County General Plan Update, or the Ukiah Valley Area Plan, there would be no new or additional impacts to wildlife movement corridors. The City would continue to apply the Ukiah 2040 General Plan goals and policies designed to reduce impacts to biological resources. Therefore, the proposed project would not result in additional impacts to biological resources not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.4 Cultural Resources

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on cultural resources. Would the project:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5
3. Disturb any human remains, including those interred outside of dedicated cemeteries

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional historic resources, archaeological resources, and human remains may occur within the city limits. However, the proposed project would not result in new or increased amounts of construction and therefore would not result in potential to damage historic resources, archaeological resources, and human remains. Any future development within the expanded city limits would remain subject to the same regulatory framework and mitigation measures identified in the Ukiah 2040 General Plan EIR, including requirements for resource assessments, avoidance protocols, and compliance with state laws governing the treatment of human remains. Therefore, the proposed project would not result in any impacts to cultural resources not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.5 Energy

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on energy. Would the project:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

Proposed Project Impacts

The proposed project would change the City's SOI and city limits; however, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the proposed project. Accordingly, the maximum buildout potential of the land annexed into the city would be the same as existing conditions and potential future energy use in these areas for subsequent construction and operation would be the same as existing conditions. Therefore, the proposed project would not result in new or increased amounts of construction or density. With mandatory adherence to Ukiah City Code Section 3000 on implementing energy efficient construction, the project would not result in new or substantially more severe significant impacts to energy beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, and Ukiah Valley Area Plan EIR.

5.1.6 Geology and Soils

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on geology and soils. Would the project:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. 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.
    b. Strong seismic ground shaking
    c. Seismic-related ground failure, including liquefaction
    d. Landslides
2. Result in substantial soil erosion or the loss of topsoil
3. Be located on a 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
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property
5. 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
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional construction and operation would be within city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Therefore, the proposed project would not result in new or increased amounts of construction or density, and therefore no corresponding increase in indirect or direct impacts related to geology and soils would occur from these activities beyond what was evaluated in the Ukiah 2040 General Plan EIR or Ukiah Valley Area Plan EIR.

The proposed project would change the City's SOI and city limits such that additional paleontological resources may occur within the city limits. However, the proposed project would not result in new or increased amounts of construction and therefore would not result in potential to damage paleontological resources. The project would not result in new or substantially more severe significant impacts to paleontological resources beyond those addressed or analyzed in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, and Ukiah Valley Area Plan EIR.

5.1.7 Greenhouse Gas Emissions

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on greenhouse gas emissions. Would the project:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional construction and operation would be within city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. The proposed project would not involve land use changes, new development, or construction activities. As such, the project would not generate emissions typically associated with development projects, such as construction-related dust, equipment exhaust, or long-term emissions from new land uses. Operational emissions associated with the addition of four police officers would be limited to a minor increase in patrol vehicle use. However, this incremental increase would be negligible as police patrol activities are part of an existing, citywide service system. The addition of four police officers would primarily redistribute patrol coverage or enhance response capacity, rather than create entirely new travel demand. Any incremental increase in vehicle related carbon dioxide emissions (CO_2) from a small number of additional patrol vehicles would be negligible and below applicable statewide or regional reduction targets and would be somewhat offset by the change of need from sheriff patrol vehicles to Ukiah Police Department vehicles in the portions currently served by Sonoma County Sheriff. Therefore, the proposed project would not result in new or increased amounts of construction or density, and therefore no corresponding increase in greenhouse gas emissions from these activities beyond what was evaluated in the Ukiah 2040 General Plan EIR or Ukiah Valley Area Plan EIR.

5.1.8 Hazards and Hazardous Materials

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on hazards and hazardous materials. Would the project:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. 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

3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment
5. 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 or excessive noise for people residing or working in the project area
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional construction and operation would be within city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Therefore, the proposed project would not result in an increase in the potential development footprint on sites with identified hazardous materials concerns beyond what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR. The proposed project would also not introduce new land uses involving the routine use or handling of hazardous materials beyond what was considered in previous environmental reviews. Hazardous materials would continue to be managed in accordance with Ukiah 2040 General Plan goals and policies designed to reduce impact to hazards and hazardous materials. The proposed project would not result in new or increased amounts of construction or density and therefore, would not result in safety hazards or excessive noise near an airport, impair implementation of an emergency response plan or emergency evacuation plan, and would not expose people or structures to risks associated with wildland fires. Therefore, the proposed project would not result in any impacts related to hazards and hazardous materials not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.9 Mineral Resources

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on mineral resources. Would the project:

1. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state
2. 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

Proposed Project Impacts

There are no significant mineral resources or mining operations in the City of Ukiah or County of Mendocino. The proposed project would change the City's SOI and city limits such that future mineral extractions, if any, would be within city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Therefore, the proposed project would not result in new or increased amounts of mineral recovery or change the currently allowed

uses that would impact mineral recovery, and therefore no corresponding impact to mineral resources beyond what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR.

5.1.10 Noise

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on noise. Would the project result in:

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
2. Generation of excessive groundborne vibration or groundborne noise levels
3. For a project located within the vicinity of a private airstrip or 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 project area to excessive noise levels

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional construction and operation would be within city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Because the proposed project would not change the land uses or zoning within the annexation areas, there would be no corresponding change in land use affecting exposure to noise or vibration, nor would there be an increase in construction related noise or vibration. The proposed project would not result in increased construction or density near an airport and, as such, would not expose people residing or working in the proposed project area to excessive noise levels. Therefore, the proposed project would not result in increases in noise producing activities beyond what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR.

5.1.11 Population and Housing

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on population and housing. Would the project:

1. Induce substantial unplanned 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)
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

Proposed Project Impacts

The proposed project would result in changes to the City's SOI and city limits such that additional growth would occur within the City's jurisdiction compared to exiting conditions. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the proposed project. Accordingly, the growth that would occur within the city limits is already planned and is consistent with the growth anticipated by the Ukiah Valley Area Plan, Ukiah 2040 General Plan, and the

County General Plan. Accordingly, the proposed project would not result in substantial unplanned population growth, or result in long-term physical environmental effects related to unplanned population growth or displacement.

5.1.12 Public Services

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on public services. Would the project:

1. 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 public services:
    a. Fire protection
    b. Police protection
    c. Schools
    d. Parks
    e. Other public facilities

Proposed Project Impacts

The proposed project would result in changes to the City's SOI and city limits such that additional growth would occur within the City's jurisdiction compared to exiting conditions. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the proposed project. Accordingly, the growth that would occur within the city limits is already planned and is consistent with the growth anticipated by the Ukiah Valley Area Plan, Ukiah 2040 General Plan, and the County General Plan. Implementation of the proposed project would require the addition of four police officers that would travel to existing Ukiah Police Department offices. The Ukiah 2040 General Plan EIR accounts for the need to expand public services, including staffing and operational capacity, to serve anticipated growth through the planning horizon. The addition of four officers would be consistent with these projections and would not represent a substantial increase beyond the service assumptions analyzed in the Ukiah 2040 General Plan EIR. Therefore, the proposed project would not result in new or more severe impacts than those previously disclosed. The proposed staffing increase would not require the construction of new police facilities or the expansion of existing facilities. The additional personnel would be accommodated within existing City infrastructure. Additionally, Ukiah Valley Police Department would continue to coordinate with the Mendocino County Sheriff's Office to provide police protection services to the city and its SOI consistent with General Plan policy PFS9.3. As such, no physical environmental changes, including land disturbance, construction-related emissions, emissions associated with police vehicles, or impacts to biological or cultural resources, would occur as a result of implementation of the proposed project. No change or additional staffing needs are anticipated for the Ukiah Valley Fire Authority, schools, parks, or other public facilities as a result of implementation of the proposed project. Therefore, the proposed project would not result in impacts to public services not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.13 Recreation

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on recreation. Would the project:

1. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated
2. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Proposed Project Impacts

The proposed project would result in changes to the City's SOI and city limits such that additional growth would occur within the City's jurisdiction compared to exiting conditions. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the proposed project. Therefore, the proposed project would not result in any development and population growth that would impact the need for or construction of parks and recreation beyond existing conditions. The proposed project does not include the construction of any recreational facilities. Therefore, the proposed project would not result in any impacts to recreation not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.14 Transportation

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on transportation. Would the project:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
4. Result in inadequate emergency access

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that additional development would be within city limits which could have an impact on transportation. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Though the proposed project would require the addition of four officers to the Ukiah Valley Police Department, this increase in staff would represent a minor operational adjustment to maintain public safety services. Although the additional officers may result in a small increase in patrol-related to driving, this would be considered redistributed or incremental operational travel within an existing service area. Police patrols are typically deployed to meet existing service needs and often replace or optimize existing coverage patterns, meaning the net change in total fleet VMT would be minimal. As such, the incremental increase in trips associated with the addition of four officers would be negligible relative to the City's overall transportation network and VMT baseline. The Ukiah 2040 General Plan EIR evaluated cumulative VMT associated with full buildout of the General Plan, including increased public services. The proposed project would be within the scope of these analyzed conditions and would not result in a measurable or substantial increase in per capita or total VMT. Therefore, the proposed project would not result in any development or population growth that would impact the circulation system, conflict with CEQA Guidelines Section 15064.3, subdivision (b), increase hazards due to a design feature, or affect emergency access beyond what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR. Accordingly, the proposed project would not result in any impacts to transportation not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.15 Tribal Cultural Resources

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines,* which provides the following to determine if a project would have a potentially significant impact on tribal cultural resources. Would the project:

1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 that is:
    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
    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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Proposed Project Impacts

Tribal cultural resources are discussed in Chapter 4.12 of the Ukiah 2040 General Plan EIR. The Ukiah 2040 General Plan EIR determined that impacts on previously unidentified tribal cultural resources is potentially significant. The EIR introduces Mitigation Measure TCR-1 to protect and avoid the disturbance of known tribal cultural resources during development in coordination with local California Native American Tribes and Mitigation Measure TCR-2 which introduces measures of encountered and unidentified tribal cultural resource during project implementation, requiring a work-halt upon finding materials. Tribal cultural resources were added to the 2016 CEQA Guidelines as a separate environmental issue area. Thus, the County General Plan Update EIR (certified August 2009) tribal cultural resources are discussed in Chapter 4.5 of the County General Plan Update EIR. The County General Plan Update EIR does not include a chapter or section dedicated to analysis of impacts to tribal cultural resources; however, it does distinguish tribal cultural resources as a separate cultural resource and analyzes general impacts to historical and cultural resources (which would include archeological resources that may originate from Native American tribes). The Ukiah Valley Area Plan EIR (certified August 2011) also does not include a chapter or section dedicated to analysis of impacts to tribal cultural resources. However, it does analyze general impacts to historical and cultural resources (which would include archeological resources that may originate from Native American tribes) as a significant and unavoidable impact. As the Notice of Preparation for the General Plan EIR was published before July 1, 2015, tribal consultation pursuant to Assembly Bill 52 (AB 52) was not required. Nonetheless, the City of Ukiah sent AB 52 and Senate Bill 18 notification letters to several tribes on June 5, 2026. As of the date of the publication of this EIR, consultation is ongoing.

The proposed project would change the City's SOI and city limits such that additional tribal cultural resources may occur within the city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Likewise, as the proposed project would not change the location of the land uses envisioned in Ukiah 2040 General Plan, County General Plan Update, or the Ukiah Valley Area Plan, there would be no new or additional impacts to tribal cultural resources or to archaeological resources that could be of Native American origin. Any future development within the expanded city limits would remain subject to the same regulatory framework and mitigation measures identified in the Ukiah 2040 General Plan EIR, including requirements for resource assessments, avoidance protocols, and compliance with state laws governing the treatment of tribal cultural resources. Any future development in the proposed project area subject to discretionary review

may be subject to AB 52. The County General Plan Update EIR and Ukiah Valley Area Plan EIR did not specifically address tribal cultural resources in their analyses, beyond resources of historical and archeological significance generally. However, the proposed project would not increase development potential of the proposed project area and as such, potential impacts to unidentified tribal cultural resources would not increase under the proposed project. Additionally, the City would continue to apply the Ukiah 2040 General Plan goals and policies designed to reduce impacts to cultural resources. Accordingly, the proposed project would not result in any impacts to tribal cultural resources not disclosed within the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or the Ukiah Valley Area Plan EIR.

5.1.16 Wildfire

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on wildfire. Would the project:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan
2. 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
3. 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
4. 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

Proposed Project Impacts

The proposed project would change the City's SOI and city limits such that future development would be within city limits. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the project. The land use and zoning designations would also be consistent with the Ukiah Valley Area Plan. Therefore, the proposed project would not result in an increase in potential development on sites with identified wildfire hazard beyond what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR. Further, as the proposed project would not increase construction or density, it would not impair implementation of an adopted emergency response plan or emergency evacuation plan, exacerbate wildfire risks, or expose people or structures to slope instability risks after a wildfire. The proposed project would not increase the number of people or structures subject to wildfire risk beyond what was evaluated in the Ukiah 2040 General Plan EIR, County General Plan Update EIR, or Ukiah Valley Area Plan EIR. Therefore, impacts of the proposed project would be less than significant as the City would uphold the updated California Fire Code, the Safety Element of the Ukiah 2040 General Plan, and 2040 General Plan policies.

5.2 Growth Inducement

Section 15126(d) of the CEQA Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.2.1 Population Growth

The proposed project would result in changes to the City's SOI and annexation of Millview, Willow, and Sanitation District territory such that additional growth would occur within the City's jurisdiction compared to existing conditions. However, the existing County land use and zoning designations would be maintained as part of the pre-zoning component of the proposed project. Accordingly, the growth that would occur within the city limits is already planned and is consistent with the growth anticipated by the Ukiah Valley Area Plan, Ukiah 2040 General Plan, and the County General Plan. The proposed project would not result in substantial unplanned population growth or result in long-term physical environmental effects related to unplanned population growth or displacement.

5.2.2 Economic Growth

The proposed project would result in changes to the City's SOI and annexation of Millview, Willow, and Sanitation District territory; however, such changes would not result in additional long-term employment or job creation as the reorganization of the City's SOI would not expand overall operations for Millview, Willow, the Sanitation District, or the City. The potential for the proposed project to result in a substantial change in employment in the city beyond employment already provided by Millview, Willow, and the Sanitation District would be minimal because no new facilities would be developed as part of the project. Additional employees necessary to fill the additional four police officer positions would likely be drawn from the existing workforce in the City of Ukiah or Mendocino County. If additional employees would be necessary for the operation of the City of Ukiah water service, it is likely these employees would also be drawn from the existing workforce in the City of Ukiah or Mendocino County. No short-term construction activities would result from the proposed project. Accordingly, the proposed project would not have potential to induce economic expansion to the extent that substantial environmental impacts would occur.

5.2.3 Removal of Obstacles to Growth

The proposed project would result in changes to the City's SOI and annexation of Millview, Willow, and Sanitation District territory. As described in Section 4.4, *Utilities and Service Systems*, the proposed project would not require or result in the construction or relocation of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. No development is proposed or would be facilitated by the proposed project. Accordingly, no infrastructure or facilities would be required to carry out the proposed project. Therefore, implementation of the proposed project would not extend infrastructure in a manner that would remove obstacles to growth in the project vicinity.

5.3 Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(b) requires that an EIR identify significant impacts that a project would cause which cannot be reduced to less than significant with the application of mitigation measures. As discussed throughout Chapter 4, *Environmental Impact Analysis,* there would be no environmental impacts which would be considered significant and unavoidable. All potentially significant impacts would be reduced to no impact through compliance with existing regulations.

6 Alternatives

6.1 Introduction

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines provides guidance for the identification and evaluation of project alternatives in an Environmental Impact Report (EIR). The *CEQA Guidelines* state that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

As required by Section 15126.6 of the *CEQA Guidelines*, this Supplemental EIR examines a range of reasonable alternatives to the project that would attain most of the following project objectives:

- Promote logical and orderly municipal boundaries consistent with the City's existing SOI
- Improve efficiency and clarity in the provision and governance of water and wastewater services
- Align service areas and jurisdictional boundaries to reduce fragmented governance and unincorporated islands
- Maintain consistency with existing County and City land use policies through pre-zoning
- Implement reorganization actions without inducing growth, expanding infrastructure capacity, or changing development potential

6.2 Project Alternatives

This discussion focuses on alternatives to the proposed project, including alternatives that were considered but ultimately rejected from further evaluation. These alternatives have been selected for their ability to reduce or eliminate one or more of the significant adverse impacts associated with the project while still meeting most of the basic project objectives. This SEIR also evaluates a No Project Alternative, consistent with the CEQA Guidelines Section 15126.6(e).

6.2.1 Alternatives Considered but Rejected from Further Evaluation

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the CEQA Guidelines, the selection of alternatives for this SEIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the proposed project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (CEQA Guidelines, Section 15126.6[f][1]).

CEQA Guidelines Section 15126.6(a) also states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other alternatives may be considered but are not required to satisfy

the requirements of CEQA. For the project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with City policies;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.
- All potentially feasible alternatives for the proposed project were evaluated in this SEIR.

6.2.2 Descriptions of Alternatives Evaluated

This analysis considers the following seven alternatives to the proposed project:

- No Project Alternative
- Alternative 1: Valley Oak (Original 2025 Proposed Reorganization)
- Alternative 2: Proposed Project plus Western Parcels and Brush Street Triangle
- Alternative 3: Proposed Project plus Brush Street Triangle
- Alternative 4: Proposed Project plus Western Parcels
- Alternative 5: Proposed Project minus territory above Lake Mendocino Drive
- Alternative 6: Acorn (Proposed Project minus territory Above Orr Springs Road)

The description and potential environmental impacts of each alternative are analyzed in Section 6.3.

6.3 Alternatives Impact Analysis

6.3.1 No Project Alternative

The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to CEQA Guidelines Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. Under the No Project Alternative, the City would not reorganize the City's sphere of influence (SOI) and would not annex any land within the Millview County Water District (Millview), Willow County Water District (Willow), or Ukiah Valley Sanitation District (Sanitation District). The City would also not pre-zone any land. No amendments to the City's General Plan would be required. As with the proposed project, the No Project Alternative would not result in any change of service, infrastructure, or land use designations.

a. Agricultural and Forestry Resources

The No Project Alternative would not result in changes to the City's SOI and would not include any annexations, district reorganizations, or pre-zoning actions. As with the proposed project, the No Project Alternative would not include any land use designation changes. Accordingly, the No Project Alternative would not result in new or increased conversion or loss of agricultural land or forest land compared to the proposed project. The No Project Alternative would have no impact on agriculture and forestry resources, similar to the proposed project.

b. Hydrology and Water Quality

The No Project Alternative would not result in changes to the City's SOI and would not include any annexations, district reorganizations, or pre-zoning actions that would require the City to manage additional stormwater runoff. In addition, the No Project Alternative does not include any development and therefore would not directly result in impacts to hydrology and water quality. Individual developments facilitated in City limits would undergo project-specific developmental review, including design review, and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code and Policy PFS-5.1 of the Ukiah 2040 General Plan which ensures stormwater control measures for future development and requires installation of green infrastructure consistent with the City's Stormwater Low Impact Development Technical Design Manual. Development would also be subject to applicable permitting processes such as the NPDES and Municipal Separate Storm Sewer System (MS4) permits to ensure adequate stormwater capture and treatment post-construction. Therefore, the No Project Alternative would have no impact on hydrology and water quality, similar to the proposed project.

c. Land Use and Planning

The No Project Alternative would not result in changes to the City's SOI and would not include any annexations, district reorganizations, pre-zoning actions, or new construction. Therefore, the No Project Alternative would not result in the potential to physically divide an established community or conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effects. No impact would occur, similar to the proposed project.

d. Utilities and Service Systems

The No Project Alternative would not result in changes to the City's SOI and would not include any annexations, district reorganizations, pre-zoning actions, or new construction. Therefore, demands for water supply, wastewater, electric and natural gas, telecommunications, or solid waste services would be limited to the City's current SOI and would therefore be less than the proposed project. Development facilitated within the City's SOI pursuant to the No Project Alternative would continue to undergo project-specific developmental review and would be subject to adopted policies in the Ukiah 2040 General Plan to ensure adequate utility services are available. The No Project Alternative would have no impact to utilities and service systems, similar to the proposed project.

e. Other CEQA Topics

Under the No Project Alternative, the proposed annexation, detachment, reorganization of service territories, and pre-zoning actions would not occur. Existing jurisdictional boundaries, service providers, and County land use designations and zoning regulations within the City of Ukiah's SOI would remain in place. No changes to land use controls, development standards, or service arrangements would occur, and no physical development or ground-disturbing activities would be authorized as a result of this alternative.

Because the No Project Alternative would not involve construction, land use changes, or infrastructure expansion, it would not result in impacts related to aesthetics, air quality, greenhouse gas emissions, energy, hazards and hazardous materials, mineral resources, noise, recreation, transportation, wildfire, or public services. In addition, because Alternative 1 would not alter zoning or development potential, it would not result in population growth, housing displacement, or increased demand for public facilities. No impact to population and housing and land use and planning would occur, similar to the proposed project.

The No Project Alternative would avoid any potential for ground disturbance and would therefore result in no impacts to biological resources, cultural resources, tribal cultural resources, geology and soils, or paleontological resources. There would be no potential for disturbance of previously unidentified archaeological, historical, or tribal cultural resources, and no mitigation measures related to inadvertent discoveries would be required under this alternative.

Although the No Project Alternative would avoid all environmental effects associated with the proposed project, it would not meet the project objectives of promoting orderly municipal boundaries, improving efficiency and clarity in water and wastewater service provision, reducing fragmented governance, or aligning service responsibilities with the City's existing SOI. In contrast, the proposed project would implement these objectives without changing land use designations, zoning, or development intensity and would remain within the scope of impacts analyzed in the previously certified Ukiah 2040 General Plan EIR, County General Plan Update EIR, and Ukiah Valley Area Plan EIR.

f. Summary

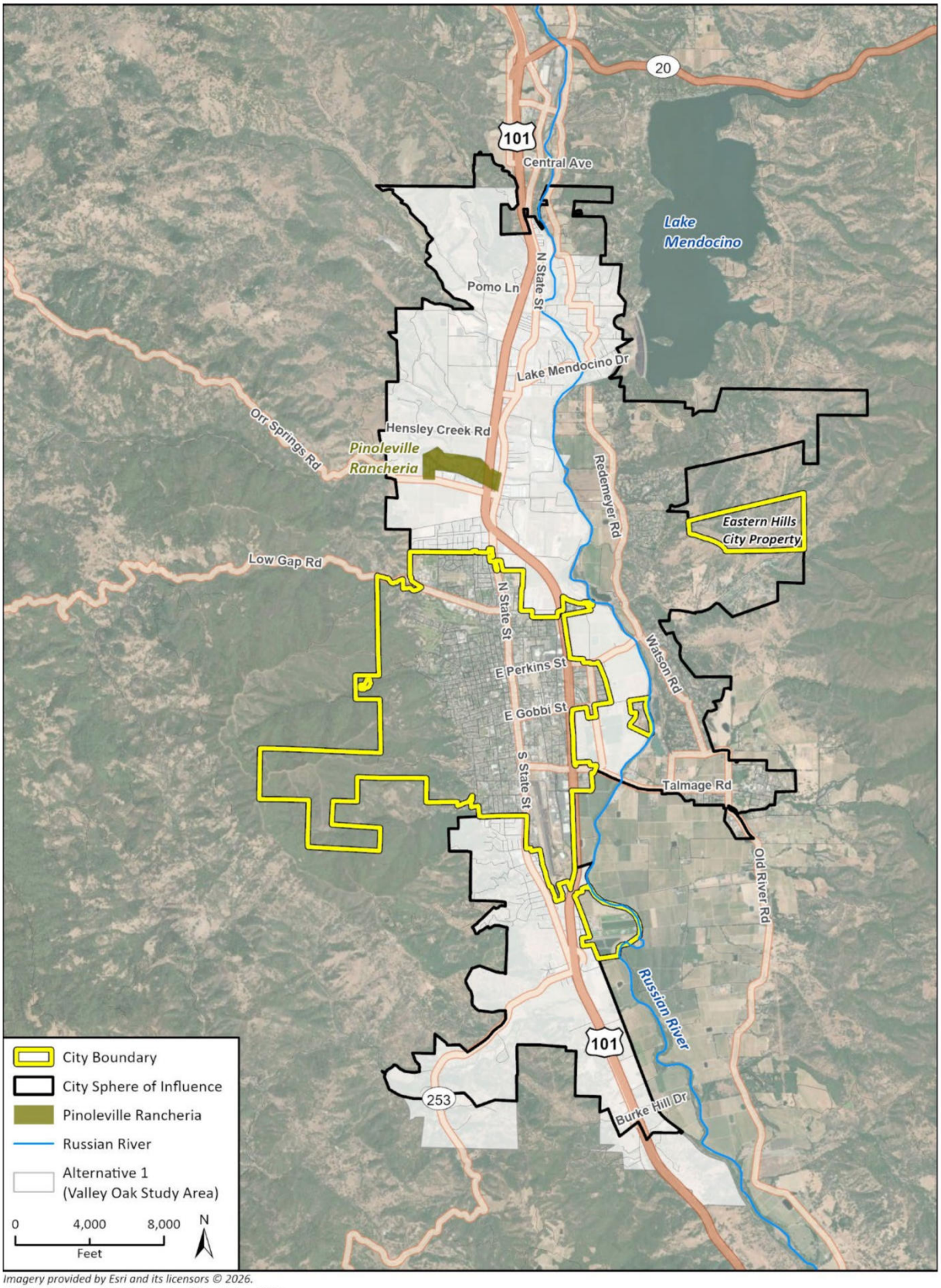
Overall, the No Project Alternative would result in similar environmental impacts than the proposed project but would not fulfill the purpose of the project.

6.3.2 Alternative 1: Valley Oak (*Original 2025 Proposed Reorganization*)

Alternative 1 is the City's originally proposed 2025 reorganization project. Alternative 1 includes an update to the City's SOI, expanding the existing SOI shown in the current General Plan to align with the southern boundaries of Willow. Alternative 1 would also consist of several changes of organization within the City's SOI involving several adjacent or overlapping districts and a number of parcels inside the city and in unincorporated portions of Mendocino County adjacent to the city. As part of Alternative 1, the City would annex approximately 70 percent of the territory of Millview and establish Millview as a subsidiary district of the City. The City would not annex the territory in the Pinoleville Rancheria and would discuss with Pinoleville whether and to what extent the City may provide services to territory within Pinoleville Rancheria to maintain the existing levels of service already being provided. Additionally, the City would annex the entirety of the territory of Willow and detach the entirety of that territory from Willow for purposes of water services, resulting in a merger of Willow with the City. As part of these annexations, the City would also annex significant portions of the Sanitation District, establishing the Sanitation District as a subsidiary district of the City. Under Alternative 1, the City would also pre-zone the unincorporated territories it would annex in order to maintain the existing land use designations currently provided for in the County General Plan and Ukiah Valley Area Plan. This would include an amendment to the Land Use Element within the City's General Plan to ensure the pre-zoning is consistent with the City's General Plan.

No change of or in service, or in infrastructure would occur at any parcel, nor would any land use designations change, as a result of Alternative 1. The proposed Alternative 1 (Valley Oak) area is shown in Figure 6-1.

Figure 6-1 Alternative 1 (Valley Oak) Area



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Additional data provided by County of Mendocino, 2026.

a. Agricultural and Forestry Resources

Alternative 1 would include an expansion of the City's SOI which is not included as part of the proposed project. Alternative 1 would also not authorize development, convert farmland, or modify existing County land use or zoning designations. Accordingly, Alternative 1 would result in a larger geographic expansion of City-managed land compared to the proposed project, including agricultural lands. However, similar to the proposed project, Alternative 1 would maintain existing County land use and zoning designations and would not include any development that could result in the direct loss of agricultural land, including land subject to a Williamson Act Contract. As with the proposed project, Alternative 1 would not encompass any forest lands. Accordingly, Alternative 1 would have no impacts on agriculture and forestry resources, similar to the proposed project.

b. Hydrology and Water Quality

Alternative 1 would include an expansion of the City's SOI which is not included as part of the proposed project. However, Alternative 1 would not result in additional construction and operational activities. Accordingly, overall stormwater runoff and groundwater use in the area would not differ as no additional development is proposed as part as a result of changes in the SOI. Alternative 1 would result in the incorporation of additional flood zone areas within city limits; however, this would be a result of SOI expansion and Alternative 1 would not introduce new development within flood zone areas. If development would be proposed after annexation, individual development would undergo project-specific developmental review, including design review and floodplain review, and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code and Policy PFS-5.1 of the Ukiah 2040 General Plan which ensures stormwater control measures for future development and requires installation of green infrastructure consistent with the City's Stormwater Low Impact Development Technical Design Manual. Development would also be subject to applicable permitting processes such as the NPDES MS4 permits to ensure adequate stormwater capture and treatment post-construction. Therefore, the proposed project would not result in new or increased amounts of construction that would impact stormwater runoff, groundwater quality, or increase pollutants. Accordingly, Alternative 1 would result in the same impacts related to hydrology and water quality as the proposed project, and no impact would occur.

c. Land Use and Planning

Alternative 1 would include an expansion of the City's SOI; however, as with the proposed project, Alternative 1 would not include any land use and zoning designation changes or introduce new development. Though Alternative 1 would result in an expansion of the City's SOI and would include the pre-zone of lands, proposed pre-zoning would be consistent with current County land use and zoning designations. Accordingly, Alternative 1 would not result in any potential to physically divide an established community or conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effects. Alternative 1 would have no impacts on land use and planning, similar to the proposed project.

d. Utilities and Service Systems

Alternative 1 would include an expansion of the City's SOI and therefore, would introduce additional needs for demands for electric and natural gas, telecommunications, or solid waste services within the City's SOI compared to the proposed project. However, Alternative 1 would not change the operations of existing water service providers. Water supply sources, treatment facilities, distribution systems, and service practices would remain unchanged. Annexation under Alternative 1 would not increase water demand or reduce available water supply. Development facilitated within the City's expanded SOI pursuant to Alternative 1 would continue to undergo project-specific developmental review and would be subject to adopted policies in the Ukiah 2040 General Plan to ensure adequate utility services are available. Under Alternative 1, the City would continue to apply its General Plan goals and policies on utilities and service systems services, such as Policy PFS-1.3: *Consolidation of Water Districts* directs the

City to support the consolidation of water districts as part of future annexations to establish efficient services and ensure adequate water supply and delivery. Overall, Alternative 1 would have no impacts to utilities and service systems, similar to the proposed project.

e. Other CEQA Topics

Alternative 1 would include an expansion of the City's SOI; however, as with the proposed project, Alternative 1 would consist solely of administrative and jurisdictional changes. Alternative 1 would not involve construction, ground-disturbing activities, infrastructure expansion, or changes to land use designations, zoning standards, or development intensity.

Because no physical development or construction would occur under Alternative 1, there would be no impacts related to aesthetics, air quality, greenhouse gas emissions, energy, noise, transportation, or hazards and hazardous materials. Similarly, Alternative 1 would not induce population growth or housing displacement, as it would not authorize new development beyond what is already permitted under existing County policies and previously analyzed planning documents. Impacts related to population and housing would therefore be less than significant, similar to the proposed project.

Alternative 1 would not require any ground disturbance and would therefore result in no impacts to biological resources, cultural resources, tribal cultural resources, geology and soils, or paleontological resources. There would be no potential for disturbance of previously unidentified archaeological, historical, or tribal cultural resources, and no mitigation measures related to inadvertent discoveries would be required.

While Alternative 1 would include a larger reorganization area than the proposed project, it would not result in changes to public service operations, recreational facilities, or emergency response services beyond administrative boundary adjustments. The City would continue to apply applicable Ukiah 2040 General Plan policies and Municipal Code requirements to ensure adequate service provision for any future development subject to discretionary review. Accordingly, impacts related to public services, recreation, wildfire, and related CEQA topics would continue to have no impacts, similar to the proposed project.

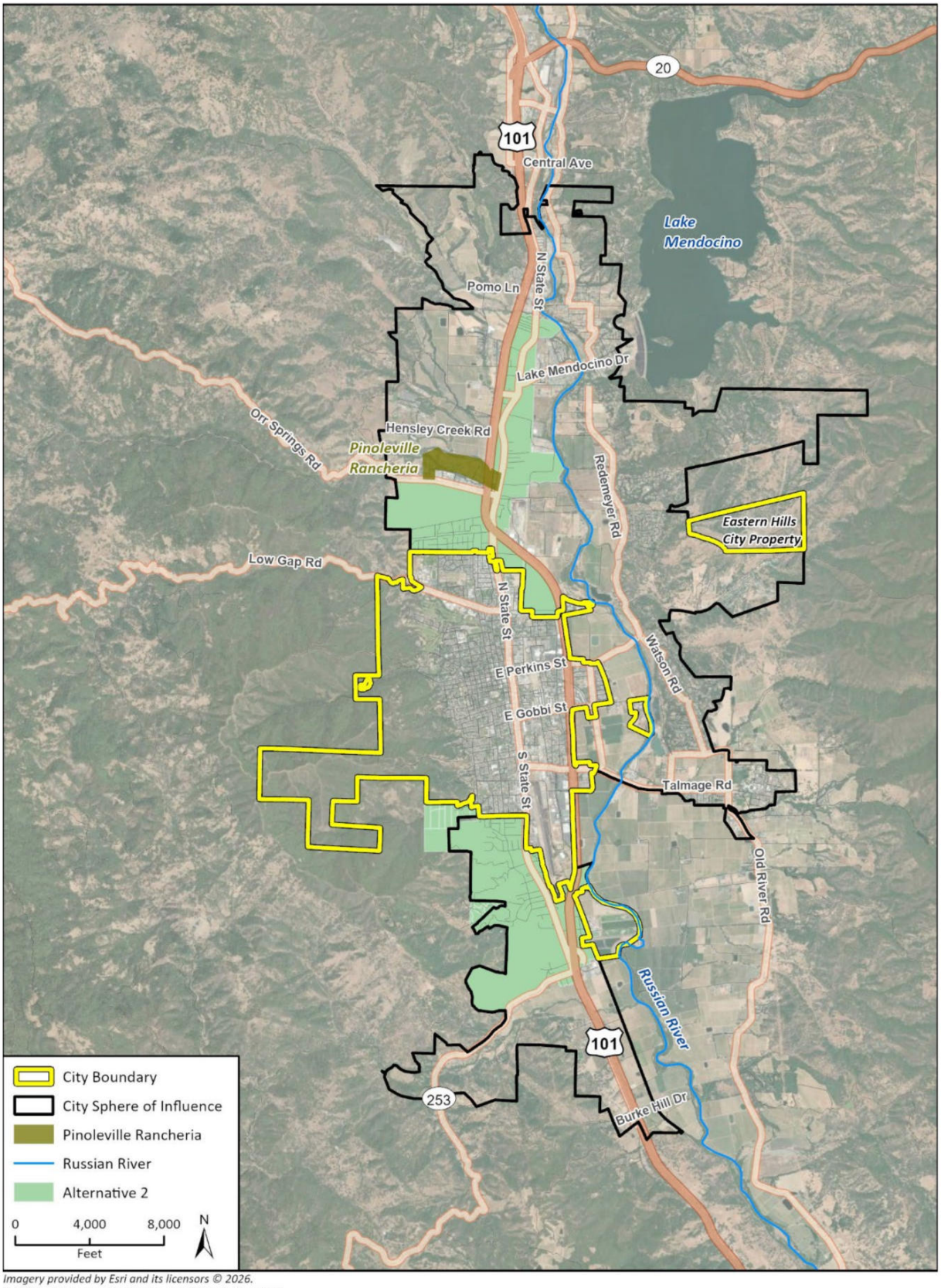
f. Summary

Overall, Alternative 1 would result in environmental impacts similar to the proposed project, with no impacts identified across all CEQA issues analyzed in this EIR. However, Alternative 1 would involve a greater SOI expansion than the proposed project.

6.3.3 Alternative 2

Alternative 2 would include the proposed project as described in Chapter 2, *Project Description,* with the addition of several areas located on both the west and east sides of the City of Ukiah. On the west side, Alternative 2 would include the Oak Knoll and Doolan Canyon areas, which are located outside the City's existing SOI, are not within a water district, and are currently served by the Ukiah Valley Sanitation District. Alternative 2 would also include an unincorporated island area located at the top of Standley Street that is entirely surrounded by the City of Ukiah. This island area is located within the City's SOI but is not currently served by a public water district or the sanitation district. On the east side of the city, Alternative 2 would include the Brush Street Triangle area, which is located within the City's SOI. None of the parcels within the Brush Street Triangle are currently served by a public water district, and some parcels are within the Ukiah Valley Sanitation District. Land uses within the additional areas included under Alternative 2 consist primarily of rural residential development and grazing land, with some urban and built-up uses present, particularly within the island and Brush Street Triangle areas. As with the proposed project, Alternative 2 would not include construction, infrastructure expansion, or changes to land use designations or zoning standards, and would not authorize new development. The proposed Alternative 2 area is shown in Figure 6-2.

Figure 6-2 Alternative 2 Area



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Additional data provided by County of Mendocino, 2026.

a. Agricultural and Forestry Resources

Alternative 2 would include a greater extent of agricultural land compared to the proposed project, including grazing land and rural residential parcels used for low-intensity agricultural purposes. Some of the additional areas included under Alternative 2 are designated for agricultural use under the Mendocino County General Plan and have not been identified for annexation under the City of Ukiah 2040 General Plan. Although Alternative 2 would include additional agricultural lands within the City's SOI and potential annexation boundary, Alternative 2 would not authorize development, convert farmland, or modify existing County land use or zoning designations. No land subject to Williamson Act contracts would be directly affected, and no forest lands would be included. As with the proposed project, any future development within annexed areas would require separate discretionary review and would remain subject to applicable agricultural resource protection policies, including City General Plan policies, Ukiah Municipal Code provisions for the conversion of agricultural land, and Local Agency Formation Commission (LAFCo) policies that discourage premature or unnecessary conversion of agricultural lands and require demonstration of planned growth and service availability. Compared to the proposed project, Alternative 2 would represent a greater inclusion of agricultural and grazing land within the City's SOI; however, the pre-zoning of these areas would not differ from current County designations and would not facilitate or accelerate agricultural land conversion. Additionally, by incorporating a more continuous area within the City's SOI and reducing fragmented boundaries, Alternative 3 would support more coordinated long-term planning for agricultural interfaces and reduce the potential for irregular jurisdictional edges that can contribute to land use conflicts. Accordingly, Alternative 2 would not propose or facilitate development, impacts to agricultural and forestry resources would be similar to the proposed project, and no impact would occur.

b. Hydrology and Water Quality

Alternative 2 would include additional areas that are not currently served by a water district and, in some cases, are not served by a sanitation district. These areas may rely on private wells and on-site wastewater systems under existing conditions. Several of the areas proposed for inclusion under Alternative 2 are also located outside of the City's existing SOI. As with the proposed project, Alternative 2 would not involve construction, grading, land disturbance, or modification of drainage patterns. Alternative 2 would not authorize new development, increase impervious surfaces, expand infrastructure capacity, or alter groundwater recharge conditions. Accordingly, Alternative 2 would not result in new or increased stormwater runoff, changes to flood behavior, or direct degradation of surface or groundwater quality. Although Alternative 2 would increase the extent of land within the City's planning and service consideration area, including areas outside the existing SOI and areas not currently served by public water or wastewater systems, this administrative action would not result in hydrologic or water quality impacts in the absence of development or infrastructure changes. Future development facilitated within city limits under Alternative 2 would undergo project-specific discretionary review, including design review and floodplain review, and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code and Policy PFS-5.1 of the Ukiah 2040 General Plan, which requires the installation of green infrastructure consistent with the City's Stormwater Low Impact Development Technical Design Manual. Development would also be subject to applicable permitting processes under NPDES and the City's MS4 permit to ensure adequate stormwater capture and treatment. Groundwater use would remain subject to the requirements of the Ukiah Valley GSP. Overall, Alternative 2 would result in no impacts to hydrology and water quality, similar to those of the proposed project.

c. Land Use and Planning

Alternative 2 would include an expansion of the City's SOI beyond what is proposed under the project. Several of the additional areas proposed for inclusion under Alternative 2 are located outside the SOI identified in the City of Ukiah 2040 General Plan and include predominantly rural and agricultural land uses. However, Alternative 2 would not modify land use or zoning designations, authorize development or result in physical changes to the environment. Because Alternative 2 would not induce growth or alter

land use patterns, it would not result in conflicts with adopted City and County land use planning frameworks. By incorporating additional areas already within the SOI, Alternative 2 would result in a more contiguous and unified planning area, reduce gaps between City jurisdictional boundaries, and avoid the creation or persistence of unincorporated islands. This improved boundary configuration would enhance long-term planning efficiency and service coordination. Accordingly, similar to the proposed project, Alternative 2 would result in no impact related to land use and planning.

d. Utilities and Service Systems

Alternative 2 would include parcels that are not currently served by a water district and, in some cases, are not served by a sanitation district. However, Alternative 2 would not authorize development, require new or expanded infrastructure, or alter existing service provision. Because Alternative 2 would not result in increased demand for water or wastewater services or trigger the need for new or expanded utility facilities, it would not create environmental impacts related to utilities and service systems. Alternative 2 would not authorize development, increase demand for water or wastewater services, or require the expansion or construction of utility infrastructure. Although Alternative 2 would include a greater proportion of parcels without established public water or wastewater service, this would not result in environmental impacts in the absence of development or increased service demand. The more cohesive service area would support more efficient long-term service planning and reduce fragmented service boundaries. Future development within areas included under Alternative 2 would remain subject to project-specific review and the City's adopted General Plan policies governing utilities and services, including policies supporting efficient service provision and consolidation of water districts. Overall, similar to the proposed project, Alternative 2 would result in no impact related to utilities and service systems.

e. Other CEQA Topics

Similar to the proposed project, Alternative 2 would not involve construction, grading, or physical improvements and Alternative 2 would not result in effects related to aesthetics, transportation, air quality, greenhouse gas emissions, noise, energy, population and housing, recreation, wildfire risk, or public services beyond what is already evaluated for the proposed project.

Because Alternative 2 would not involve ground disturbance, it would not result in impacts to biological resources, cultural resources, tribal cultural resources, geology, soils, or hazards and hazardous materials. No mitigation measures would be required under Alternative 2.

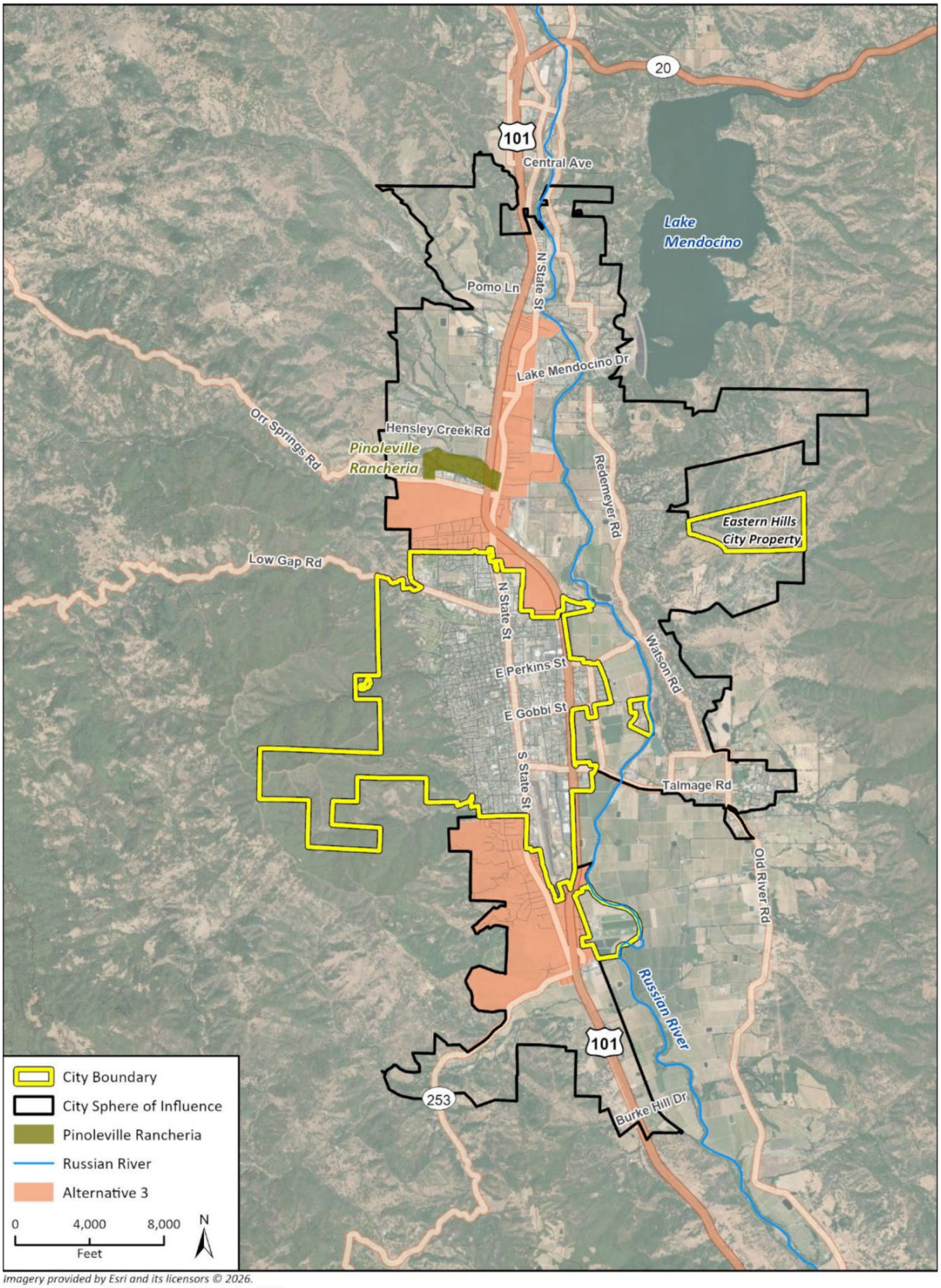
f. Summary

Overall, Alternative 2 would result in similar impacts across all CEQA resource areas compared to the proposed project. Although Alternative 2 would include additional rural and agricultural areas, expansion of the City's SOI, and inclusion of parcels without established water and wastewater service, it would not authorize development or result in physical environmental changes.

6.3.4 Alternative 3

Alternative 3 would include the proposed project and would expand the reorganization area to include additional parcels located on the east side of the City of Ukiah. Specifically, Alternative 3 would include the Brush Street Triangle area, which is located entirely within the City's SOI. None of the parcels within the Brush Street Triangle are served by a public water district, and some parcels are served by the Ukiah Valley Sanitation District. Land uses in this area consist primarily of grazing land, with some existing urban and built-up land. Alternative 3 would not expand the City's SOI beyond its currently adopted boundaries and would not include west-side areas outside the SOI. As with the proposed project, Alternative 3 would not involve construction, would not expand utility infrastructure, and would not modify land use designations or zoning standards or authorize new development. The proposed Alternative 3 area is shown in Figure 6-3.

Figure 6-3 Alternative 3 Area



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Additional data provided by County of Mendocino, 2026.

a. Agricultural and Forestry Resources

Alternative 3 would include a greater extent of agricultural land compared to the proposed project, consisting primarily of grazing land located within the City's SOI. While Alternative 3 would also include urban and built-up parcels, these areas do not constitute agricultural resources. Although Alternative 3 would include additional agricultural lands within the City's SOI and potential annexation boundary, it would not authorize development, convert farmland, or modify existing County land use or zoning designations. Alternative 3 would also not authorize development, convert farmland, or modify existing County land use or zoning designations. No land subject to Williamson Act contracts would be directly affected, and no forest lands would be included. As with the proposed project, any future development within annexed areas would require separate discretionary review and would remain subject to applicable agricultural resource protection policies, including Ukiah General Plan Policies LU-7.5, LU-8.2, AG-1.1, and AG-1.2, which discourage premature urban development, reduce agricultural-urban conflicts, and support the long-term viability of agricultural uses within and adjacent to the City. Compared to the proposed project, Alternative 3 would represent a greater inclusion of grazing land within the City's SOI but no development is proposed or facilitated. Alternative 3 would have no impacts to agricultural and forestry resources, similar to the proposed project.

b. Hydrology and Water Quality

Alternative 3 would include additional areas that are not currently served by a water district and, in some cases, are not served by a sanitation district. These areas may rely on private wells and on-site wastewater systems under existing conditions. All areas proposed for inclusion under Alternative 3 are located within the City's existing SOI. As with the proposed project, Alternative 3 would not involve construction, grading, land disturbance, or modification of drainage patterns. Alternative 3 would not authorize new development, increase impervious surfaces, expand infrastructure capacity, or alter groundwater recharge conditions. Accordingly, Alternative 3 would not result in new or increased stormwater runoff, changes to flood behavior, or direct degradation of surface or groundwater quality. Although Alternative 3 would increase the extent of land within the City's planning and service consideration area that is not currently served by public water or wastewater systems, this would not result in hydrology or water quality impacts in the absence of development or infrastructure changes. Future individual developments within City limits under Alternative 3 would undergo project-specific discretionary review, including design review and floodplain review, and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code and Policy PFS-5.1 of the Ukiah 2040 General Plan, which requires the installation of green infrastructure consistent with the City's Stormwater Low Impact Development Technical Design Manual. Development would also be subject to applicable permitting processes under NPDES and the City's MS4 permit to ensure adequate stormwater capture and treatment. Groundwater use would remain subject to the requirements of the Ukiah Valley GSP. Therefore, similar to the proposed project, Alternative 3 would result in no impacts related to hydrology and water quality.

c. Land Use and Planning

Similar to the proposed project, Alternative 3 would not include an expansion of the City's SOI. Alternative 3 would not modify existing land use or zoning designations, would not authorize new development, and would not alter development intensity or permitted uses. As a result, Alternative 3 would maintain consistency with adopted City and County land use plans and policies, including the City of Ukiah 2040 General Plan and the Mendocino County General Plan. Because Alternative 3 would not induce growth or alter land use patterns, it would not result in conflicts with adopted City and County land use planning frameworks. Because these changes are administrative in nature and would not result in physical changes to the environment, no impacts related to land use and planning would occur, similar to the proposed project.

d. Utilities and Service Systems

Alternative 3 would include parcels that are not currently served by a water district and, in some cases, are not served by a sanitation district. Compared to the proposed project, which focuses on areas within existing service districts or areas with established service relationships, Alternative 3 would include a higher proportion of parcels where long-term water supply has not yet been formally established by a public agency. However, Alternative 3 would not authorize development, increase demand for water or wastewater services, or require the expansion or construction of utility infrastructure. Although Alternative 3 would include a greater proportion of parcels without established public water or wastewater service, this would not result in environmental impacts in the absence of development or increased service demand. Future development within areas included under Alternative 3 would remain subject to project-specific review and the City's adopted General Plan policies governing utilities and services, including Policy PFS-1.3, which supports efficient service provision and the consolidation of water districts to ensure adequate and reliable utility services. Overall, Alternative 3 would result in no impacts related to utilities and service systems, similar to the proposed project.

e. Other CEQA Topics

Similar to the proposed project, Alternative 3 would not involve construction, grading, or physical improvements and Alternative 3 would not result in effects related to aesthetics, transportation, air quality, greenhouse gas emissions, noise, energy, population and housing, recreation, wildfire risk, or public services beyond what is already evaluated for the proposed project.

Because Alternative 3 does not involve ground disturbance, it would not result in impacts to biological resources, cultural resources, tribal cultural resources, geology, soils, or hazards and hazardous materials. No mitigation measures would be required under Alternative 3.

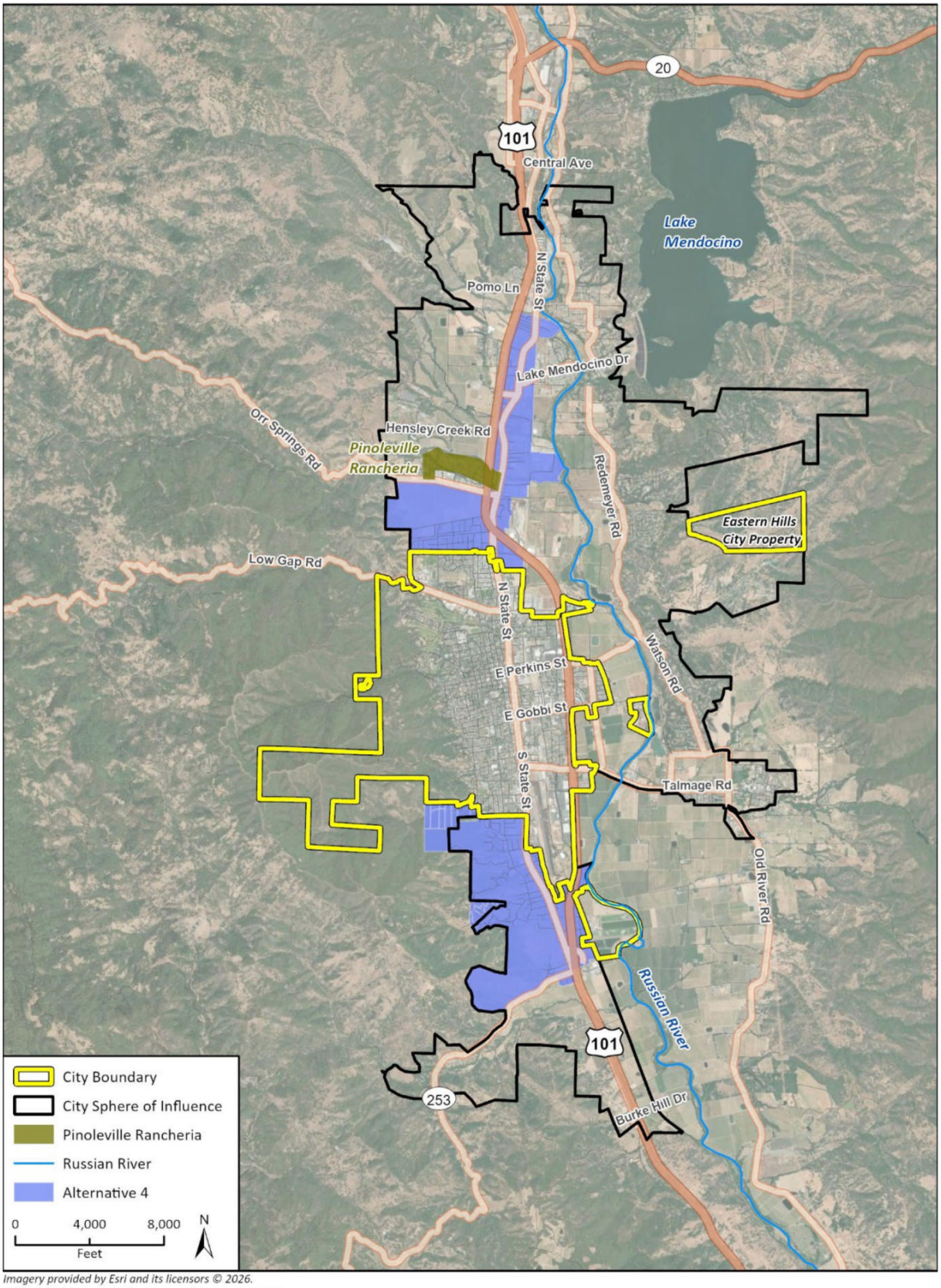
f. Summary

Overall, Alternative 3 would result in similar impacts across most CEQA resource areas compared to the proposed project. While Alternative 3 includes additional agricultural lands and parcels without established water and wastewater service, these differences would not result in environmental impacts in the absence of development or infrastructure changes.

6.3.5 Alternative 4

Alternative 4 would include the proposed project and would expand the reorganization area to include additional parcels located on the west side of the City of Ukiah. These areas include the Oak Knoll and Doolan Canyon areas, which are located outside the City's existing SOI, are not within a water district, and are currently served by the Ukiah Valley Sanitation District. Alternative 4 would also include the unincorporated island area located at the top of Standley Street, which is within the City's SOI but not currently served by a water district or the sanitation district. Land uses within the additional areas included under Alternative 4 consist of rural residential development, grazing land, and some urban and built-up uses. Alternative 4 would not include additional east side areas such as the Brush Street Triangle. As with the proposed project, Alternative 4 would not include construction or infrastructure expansion and would not modify land use designations, zoning standards, or authorize new development. The proposed Alternative 4 area is shown in Figure 6-4.

Figure 6-4 Alternative 4 Area



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Additional data provided by County of Mendocino, 2026.

a. Agricultural and Forestry Resources

Alternative 4 would include a greater extent of agricultural land compared to the proposed project, including grazing land and rural residential parcels used for low-intensity agricultural purposes. Some of the additional areas included under Alternative 4 are designated for agricultural use under the Mendocino County General Plan and have not been identified for annexation under the City of Ukiah 2040 General Plan. Although Alternative 4 would include additional agricultural lands within and adjacent to the City's SOI and potential annexation boundary, Alternative 4 would not authorize development, convert farmland, or modify existing County land use or zoning designations. No land subject to Williamson Act contracts would be directly affected, and no forest lands would be included. As with the proposed project, any future development within annexed areas would require separate discretionary review and would remain subject to applicable agricultural resource protection policies. Compared to the proposed project, Alternative 4 would represent a greater inclusion of agricultural and grazing land within the City's SOI, which could incrementally increase long-term growth pressure on agricultural resources. However, because no development is proposed or facilitated, Alternative 4 would result in no impacts to agricultural and forestry resources, similar to the proposed project.

b. Hydrology and Water Quality

Alternative 4 would include additional areas that are not currently served by a water district and, in some cases, are not served by a sanitation district. These areas may rely on private wells and on-site wastewater systems under existing conditions. Several of the areas proposed for inclusion under Alternative 4 are also located outside of the City's existing SOI. As with the proposed project, Alternative 4 would not involve construction, grading, land disturbance, or modification of drainage patterns. Alternative 4 would not authorize new development, increase impervious surfaces, expand infrastructure capacity, or alter groundwater recharge conditions. Accordingly, Alternative 4 would not result in new or increased stormwater runoff, changes to flood behavior, or direct degradation of surface or groundwater quality. Although Alternative 4 would increase the extent of land within the City's planning and service consideration area, including areas outside the existing SOI and areas not currently served by public water or wastewater systems, this would not result in hydrologic or water quality impacts in the absence of development or infrastructure changes. Future development facilitated within City limits under Alternative 4 would undergo project-specific discretionary review, including design review and floodplain review, and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code and Policy PFS-5.1 of the Ukiah 2040 General Plan, which requires the installation of green infrastructure consistent with the City's Stormwater Low Impact Development Technical Design Manual. Development would also be subject to applicable permitting processes under NPDES and the City's MS4 permit to ensure adequate stormwater capture and treatment. Groundwater use would remain subject to the requirements of the Ukiah Valley GSP. Overall, Alternative 4 would result in no impacts related to hydrology and water quality, similar to the proposed project.

c. Land Use and Planning

Alternative 4 would include an expansion of the City's SOI beyond what is proposed under the project. Several of the additional areas proposed for inclusion under Alternative 4 are located outside of the SOI identified in the City of Ukiah 2040 General Plan and include predominantly rural and agricultural land uses. However, Alternative 4 would not modify land use or zoning designations or authorize development. As such, it would not result in physical changes to the environment or conflicts with adopted County or City land use frameworks. Although Alternative 4 would expand the City's SOI into areas that are not currently identified for annexation, this administrative action would not, in and of itself, result in land use impacts in the absence of development or changes to land use designations. Therefore, similar to the proposed project, Alternative 4 would result in no impact related to land use and planning.

d. Utilities and Service Systems

Alternative 4 would include an expansion of the City's SOI beyond what is proposed under the project, including areas outside of the SOI identified in the Ukiah 2040 General Plan that consist predominantly of rural and agricultural land uses. However, Alternative 4 would not modify land use or zoning designations or authorize development As such, it would not result in physical changes to the environment or conflicts with applicable land use plans, policies, or regulations. Although Alternative 4 would extend the City's SOI, annexation would not, in and of itself, result in land use impacts in the absence of development or changes to land use designations. Should development be proposed, within areas included under Alternative 4 would remain subject to project-specific review and the City's adopted General Plan policies governing utilities and services, including policies supporting efficient service provision and consolidation of water districts. Overall, Alternative 4 would result in no impact related to utilities and service systems, similar to the proposed project.

e. Other CEQA Topics

Similar to the proposed project, Alternative 4 would not involve construction, grading, or physical improvements and Alternative 4 would not result in effects related to aesthetics, transportation, air quality, greenhouse gas emissions, noise, energy, population and housing, recreation, wildfire risk, or public services beyond what is already evaluated for the proposed project.

Because Alternative 4 would not involve ground disturbance, it would not result in impacts to biological resources, cultural resources, tribal cultural resources, geology, soils, or hazards and hazardous materials. No mitigation measures would be required under Alternative 4.

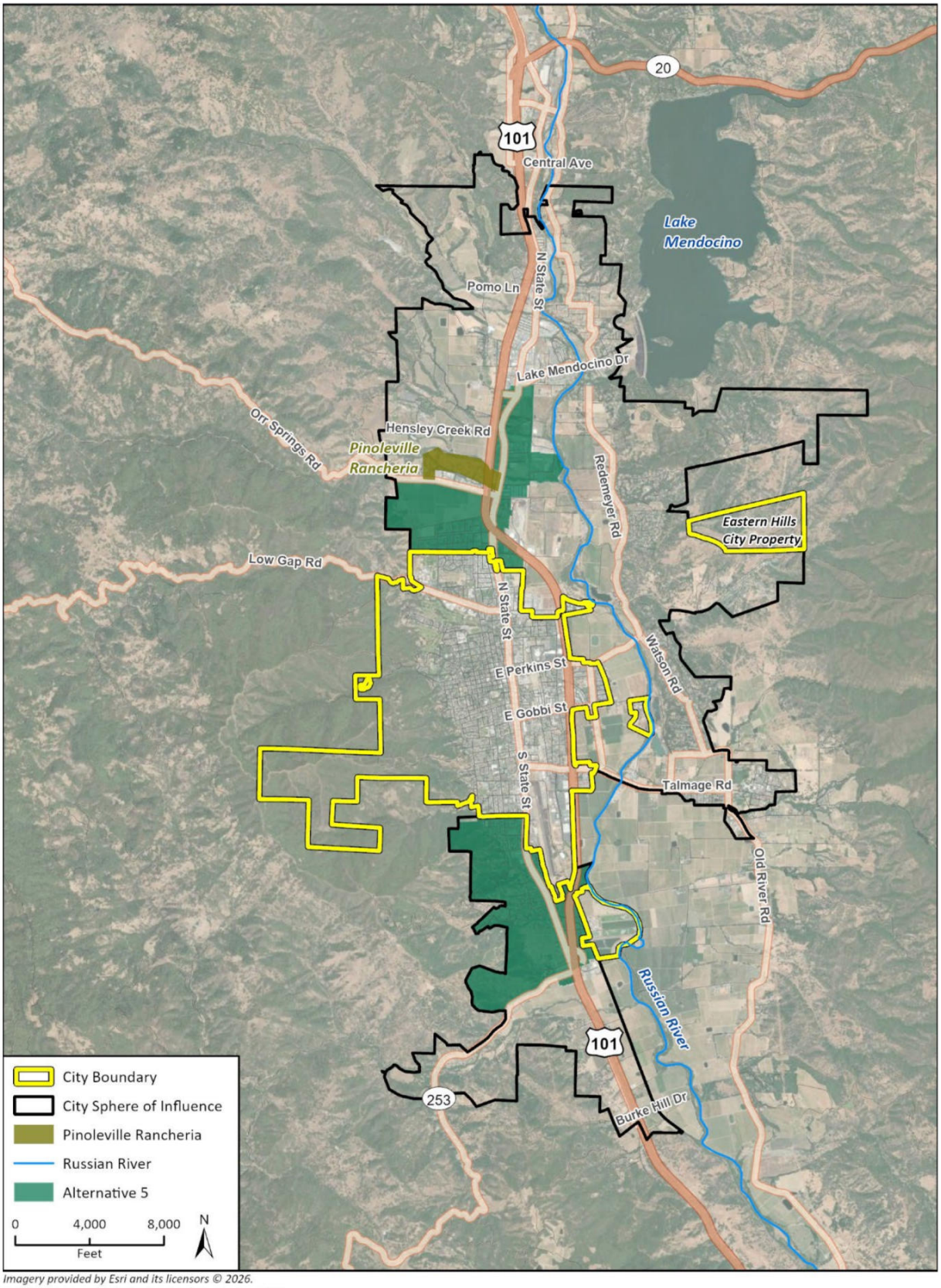
f. Summary

Overall, Alternative 4 would result in similar impacts across most CEQA resource areas compared to the proposed project. While Alternative 4 includes additional agricultural lands and parcels without established water and wastewater service, these differences would not result in environmental impacts in the absence of development or infrastructure changes.

6.3.6 Alternative 5

Alternative 5 would include a reduced version of the proposed project. Under Alternative 5, parcels located north of the intersection of North State Street and Lake Mendocino Drive would be excluded from the proposed project area. By reducing the proposed project area, Alternative 5 would include fewer urban and built-up parcels compared to the proposed project. No additional areas outside of the City's existing SOI would be included. As with the proposed project, Alternative 5 would not involve changes to land use designations or zoning standards, would not authorize new development, and would not result in changes to service or infrastructure. The proposed Alternative 5 area is shown in Figure 6-5.

Figure 6-5 Alternative 5 Area



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Additional data provided by County of Mendocino, 2026.

a. Agricultural and Forestry Resources

Alternative 5 would include a reduced version of the proposed project and would exclude parcels located north of the intersection of North State Street and Lake Mendocino Drive. As a result, Alternative 5 would include fewer urban and built-up parcels and would not add additional agricultural land beyond what is included under the proposed project. Compared to the proposed project, Alternative 5 would slightly reduce the extent of land within the City's SOI. Similar to the proposed project, Alternative 5 would not authorize development, convert farmland, modify existing County land use or zoning designations, or reduce the viability of existing agricultural uses. No land subject to Williamson Act contracts would be affected, and no forest lands would be included. Future development would require separate discretionary review and would remain subject to applicable agricultural resource protection policies adopted by the City. Because Alternative 5 would not include additional agricultural lands, no impacts to agricultural and forestry resources would occur, similar to the proposed project.

b. Hydrology and Water Quality

Alternative 5 would reduce the overall extent of territory included in the reorganization area compared to the proposed project by excluding parcels north of North State Street and Lake Mendocino Drive. As with the proposed project, Alternative 5 would not involve construction, grading, land disturbance, or modification of drainage patterns. Alternative 5 would not authorize new development, increase impervious surfaces, expand infrastructure capacity, or alter groundwater recharge conditions. Future development within City limits under Alternative 5 would undergo project-specific discretionary review and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code; Policy PFS-5.1 of the Ukiah 2040 General Plan; the City's Stormwater Low Impact Development Technical Design Manual; applicable NPDES requirements; the City's MS4 permit; and groundwater management requirements established under the Ukiah Valley GSP. Overall, Alternative 5 would result in no impacts related to hydrology and water quality, similar to those associated with the proposed project.

c. Land Use and Planning

Alternative 5 would represent a reduced annexation and reorganization area compared to the proposed project and would not include parcels north of North State Street and Lake Mendocino Drive. Alternative 5 would not expand the City's SOI beyond what is proposed and would not modify land use or zoning designations or authorize development. Because Alternative 5 would reduce the geographic extent of the proposed reorganization and would remain fully consistent with the City of Ukiah 2040 General Plan and would maintain consistency with adopted land use policies intended to promote orderly growth, efficient service provision, and preservation of rural and agricultural areas. Land use designations established by the Mendocino County General Plan for areas included under Alternative 5 would carry over upon annexation without change through pre-zoning, maintaining consistency with existing County land use policies. Accordingly, Alternative 5 would result in no impacts related to land use and planning similar to the proposed project.

d. Utilities and Service Systems

Alternative 5 would reduce the number of parcels included in the reorganization area compared to the proposed project. By excluding parcels north of North State Street and Lake Mendocino Drive, Alternative 5 would reduce the extent of land requiring future consideration for water supply and wastewater service provision. As with the proposed project, Alternative 5 would not authorize development or require immediate expansion of utility infrastructure. Future development within areas included under Alternative 5 would remain subject to project-specific review and the City's adopted General Plan policies governing utilities and services, including policies supporting efficient service provision, infrastructure adequacy, and consolidation of water districts. Overall, Alternative 5 would result in no impacts related to utilities and service systems similar to the proposed project.

e. Other CEQA Topics

Similar to the proposed project, Alternative 5 would not involve construction, grading, or physical improvements and would not result in effects related to aesthetics, transportation, air quality, greenhouse gas emissions, noise, energy, population and housing, public services, recreation, or wildfire risk, beyond what is already evaluated for the proposed project.

Because Alternative 5 would not involve ground disturbance, it would not result in impacts to biological resources, cultural resources, tribal cultural resources, geology and soils, or hazards and hazardous materials. No mitigation measures would be required under Alternative 5.

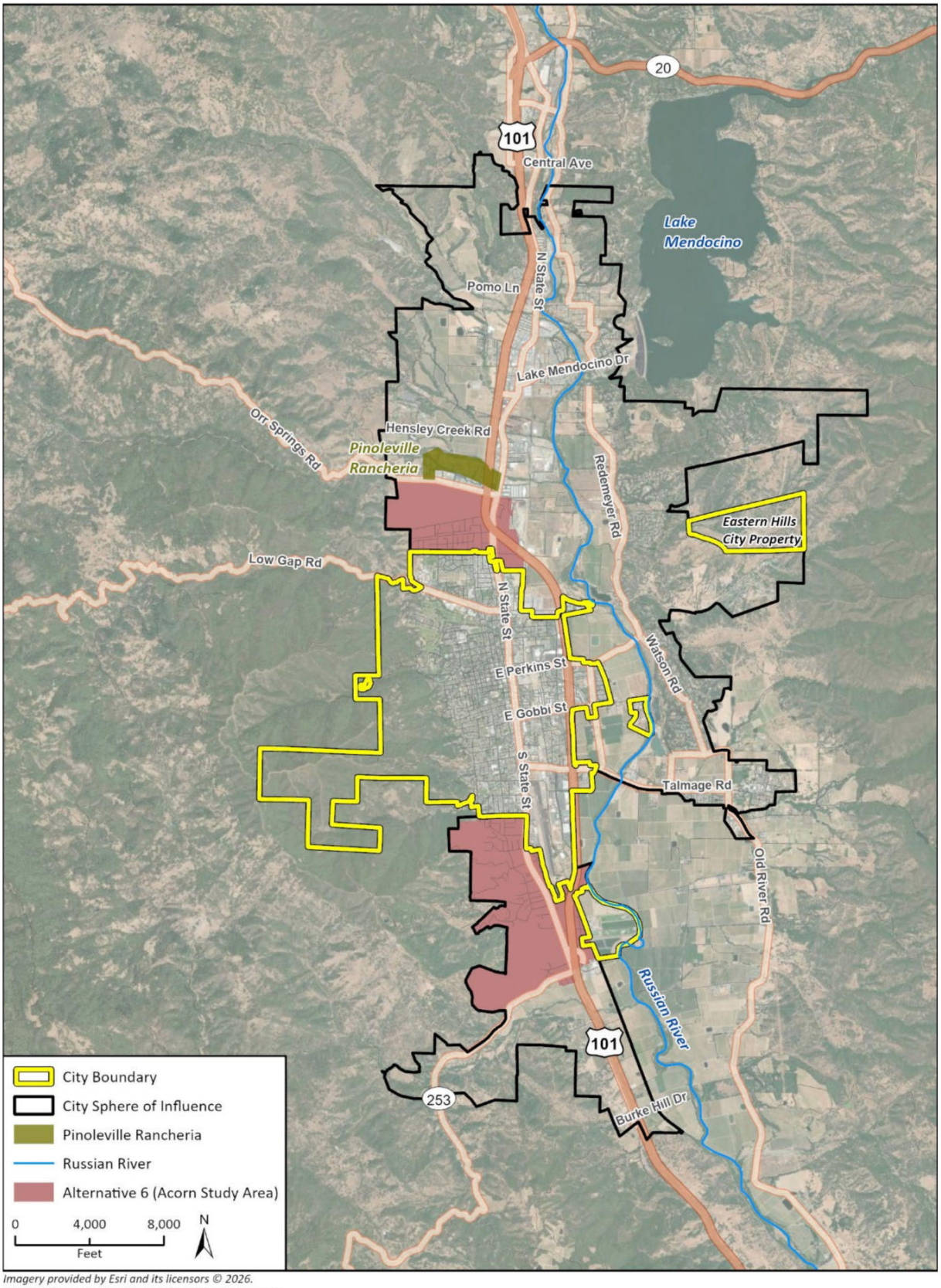
f. Summary

Overall, Alternative 5 would result in similar impacts across all CEQA resource areas compared to the proposed project.

6.3.7 Alternative 6 (*Acorn*)

Alternative 6 would include a further reduction of the reorganization area compared to Alternative 5. Under Alternative 6, parcels located north of Orr Springs Road would be excluded from the reorganization area. This reduction would remove additional land from the proposed project area, including parcels containing unique farmland and prime farmland. Alternative 6 would include fewer agricultural and urban parcels compared to both the proposed project and Alternative 5. As with the proposed project and Alternative 5, Alternative 6 would not involve construction, infrastructure expansion, or changes to land use designations or zoning standards and would not authorize new development. The proposed Alternative 6 (Acorn) area is shown in Figure 6-6.

Figure 6-6 Alternative 6 (Acorn) Area



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Additional data provided by County of Mendocino, 2026.

a. Agricultural and Forestry Resources

Alternative 6 would include a further reduced version of the proposed project compared to Alternative 5 and would exclude parcels located north of Orr Springs Road. This reduction would remove additional land from the reorganization area, including parcels that contain unique farmland and prime farmland. Compared to the proposed project, Alternative 6 would include the smallest extent of agricultural land within the City's SOI. Similar to the proposed project, Alternative 6 would not authorize development, convert farmland, modify existing County land use or zoning designations, or reduce the viability of existing agricultural uses. No land subject to Williamson Act contracts would be directly affected, and no forest lands would be included. Any future development within annexed areas would require separate discretionary review and would remain subject to applicable agricultural resource protection policies adopted by the City. Therefore, Alternative 6 would result in no impacts to agricultural and forestry resources, similar to the proposed project.

b. Hydrology and Water Quality

Alternative 6 would further reduce the reorganization area compared to Alternative 5 by excluding parcels north of Orr Springs Road. As with the proposed project Alternative 6 would not involve construction, grading, land disturbance, or modification of drainage patterns. Alternative 6 would not authorize new development, increase impervious surfaces, expand infrastructure capacity, or alter groundwater recharge conditions. Future development within City limits under Alternative 6 would undergo project-specific discretionary review and would be subject to adopted regulations, including Division 9, Chapter 7 of the Ukiah City Code; Policy PFS-5.1 of the Ukiah 2040 General Plan; the City's Stormwater Low Impact Development Technical Design Manual; applicable NPDES requirements; the City's MS4 permit; and groundwater management requirements established under the Ukiah Valley GSP. Overall, Alternative 6 would result in no impacts related to hydrology and water quality under Alternative 6 would be less than significant and reduced compared to the proposed project and all other action alternatives.

c. Land Use and Planning

Alternative 6 would represent the smallest reorganization area among the action alternatives. By excluding parcels north of Orr Springs Road, Alternative 6 would reduce the geographic extent of City planning influence and would avoid extending the City's growth and service considerations into more rural and agricultural areas. Alternative 6 would not expand the City's Sphere of Influence beyond what is proposed, would not modify land use or zoning designations, and would not authorize development. As a result, Alternative 6 would maintain consistency with adopted Ukiah 2040 General Plan policies intended to promote orderly growth, direct urban development to planned service areas, and preserve rural and agricultural lands. Accordingly, impacts related to land use and planning under Alternative 6 would have no impacts to land use and planning, similar to the proposed project.

d. Utilities and Service Systems

Alternative 6 would further reduce the number of parcels included in the reorganization area compared to Alternative 5 and the proposed project. By excluding parcels north of Orr Springs Road, Alternative 6 would decrease the extent of land requiring future consideration for water supply and wastewater service provision. As with the proposed project, Alternative 6 would not authorize development or require immediate expansion of utility infrastructure. Future development within areas included under Alternative 6 would remain subject to project-specific review and the Ukiah 2040 General Plan policies governing utilities and services, including policies supporting efficient service provision, infrastructure adequacy, and consolidation of water districts. Overall, Alternative 6 would result in no impacts related to utilities and service systems, similar to the proposed project.

e. Other CEQA Topics

Similar to the proposed project and other alternatives, Alternative 6 would not involve construction, grading, or physical improvements and Alternative 6 would not result in effects related to aesthetics, transportation, air quality, greenhouse gas emissions, noise, energy, population and housing, recreation, wildfire risk, or public services beyond what is already evaluated for the proposed project.

Because Alternative 6 does not involve ground disturbance, it would not result in impacts to biological resources, cultural resources, tribal cultural resources, geology and soils, or hazards and hazardous materials. No mitigation measures would be required under Alternative 6.

f. Summary

Overall, Alternative 6 would result in similar or reduced impacts across all CEQA resource areas compared to the proposed project and all other action alternatives due to its reduced geographic scope and exclusion of additional agricultural and rural lands.

6.4 Environmentally Superior Alternative

Table 6-1 summarizes and compares the environmental impacts of the proposed project and the alternatives evaluated in this EIR, indicating whether each alternative would result in environmental impacts that are greater than, less than, or similar to those of the proposed project for each of the resource areas studied. As required by CEQA Guidelines Section 15126.6, this comparison considers both the relative environmental effects of each alternative and each alternative's ability to meet the project objectives.

No Project Alternative

Under the No Project Alternative, the City would not reorganize its SOI, would not annex territory within the Millview County Water District, Willow County Water District, or Ukiah Valley Sanitation District, and would not pre-zone unincorporated lands. Existing jurisdictional boundaries, service arrangements, and County land use and zoning designations would remain unchanged.

From an environmental perspective, the No Project Alternative would avoid all potential environmental impacts associated with the proposed reorganization, including impacts related to agricultural resources, land use planning, hydrology, and utilities. However, the No Project Alternative would not achieve the primary project objectives, including promoting logical and orderly municipal boundaries, improving efficiency and clarity in the provision of water and wastewater services, reducing fragmented governance and unincorporated islands, and aligning service areas with the City's existing planning framework. Because it would not meet most of the project objectives, the No Project Alternative is not considered environmentally superior.

Alternative 1: Valley Oak (Original 2025 Proposed Reorganization)

Alternative 1 would expand the City's SOI beyond what is proposed under the project and would include a broader reorganization of water and sanitation service areas. Although Alternative 1 would not authorize development or result in construction or physical environmental impacts, the SOI expansion would increase the City's long-term planning influence over rural and agricultural lands that were not contemplated for annexation under the City's 2040 General Plan.

Compared to the proposed project, Alternative 1 would result in similar land use planning, utility service, hydrology, and agricultural impacts. While Alternative 1 would advance some project objectives related to service consolidation, it would do so over a broader geographic area, resulting in greater planning uncertainty. As a result, Alternative 1 is not considered environmentally superior to the proposed project.

Alternative 2

Alternative 2 would include additional western and eastern areas, some located outside the City's existing SOI and some not currently served by public water or wastewater providers. Environmental effects under Alternative 2 would be similar to the proposed project, with no impacts identified across all CEQA resource areas. Compared to the proposed project and other alternatives, Alternative 2 would incorporate a larger and more contiguous area within the City's existing SOI, reduce fragmented jurisdictional boundaries, and avoid the creation or persistence of unincorporated islands. This more cohesive boundary configuration would improve long-term planning efficiency and support more coordinated service provision, while remaining fully consistent with the City's adopted planning framework. Because Alternative 2 would achieve the proposed project objectives while maintaining no environmental impacts and improving boundary continuity and service efficiency, Alternative 2 is considered environmentally superior.

Alternative 3

Alternative 3 would include additional east side parcels within the City's existing SOI, some of which are not currently served by water or sanitation districts. This alternative would not expand the SOI, modify land use or zoning designations, or authorize development. Compared to the proposed project, Alternative 3 would result in similar impacts related to agricultural resources, hydrology and water quality, land use planning, and utilities Because Alternative 3 would expand the City's SOI into areas not identified for near-term annexation and would increase service uncertainty, it is not considered environmentally superior.

Alternative 4

Alternative 4 would expand the City's SOI and include additional west side rural and agricultural areas not identified for annexation in the Ukiah 2040 General Plan. This alternative would increase planning uncertainty and the City's influence over rural lands while also including parcels without established water and wastewater service.

Compared to the proposed project, Alternative 4 would result in similar impacts related to agricultural resources, land use and planning, hydrology, and utilities. However, Alternative 4 would represent a broader departure from planned growth patterns and is not considered environmentally superior.

Alternative 5

Alternative 5 would exclude parcels north of North State Street and Lake Mendocino Drive, reducing the overall geographic extent of the reorganization area. Compared to the proposed project, this alternative would result in similar planning influence over additional land.

Alternative 5 would have no impacts for all CEQA resource areas similar to the proposed project. Impacts under Alternative 5 would be less than significant and reduced for several resource areas. While Alternative 5 would reduce the overall project area, it would not achieve the same level of boundary continuity, elimination of jurisdictional gaps, or reduction of unincorporated islands as Alternative 2.

Alternative 6

Alternative 6 would further reduce the reorganization area by excluding parcels north of Orr Springs Road, including parcels containing unique farmland and prime farmland. This alternative would include the smallest geographic area among the action alternatives and would reduce the City's planning influence over rural and agricultural lands to the greatest extent.

Alternative 6 would result in no impacts across all resource areas but would not meet proposed project objectives to the same degree as Alternative 2, particularly with respect to creating logical and orderly

jurisdictional boundaries, reducing fragmentation, and improving service coordination across a continuous planning area. Accordingly, Alternative 6 is not considered environmentally superior.

Environmentally Superior Alternative

Based on the comparative analysis above and the impact summary presented in Table 6-1, Alternative 2 is identified as the environmentally superior alternative. Alternative 2 would result in no environmental impacts, similar to the proposed project and other alternatives, while providing the greatest benefit in terms of creating a more contiguous and cohesive SOI boundary, reducing jurisdictional gaps and unincorporated islands, and supporting efficient long-term land use and service planning. Because it best balances achievement of project objectives with environmental protection, Alternative 2 represents the environmentally superior alternative.

Table 6-1 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	No Project Alternative	Alternative 1: Valley Oak	Alternative 2: Expanded Reorganization (West & East Areas)	Alternative 3: Expanded Reorganization (East Side Only)	Alternative 4: Expanded Reorganization (West Side Areas)	Alternative 5: Reduced Reorganization	Alternative 6: Further Reduced Reorganization
Agricultural and Forestry Resources	No Impact	=	=	=	=	=	=	=
Hydrology and Water Quality	No Impact	=	=	=	=	=	=	=
Land Use and Planning	No Impact	=	=	=	=	=	=	=
Utilities and Service Systems	No Impact	=	=	=	=	=	=	=
Other CEQA Topics	No Impact	=	=	=	=	=	=	=

\+ Superior to the proposed project (reduced level of impact)

\- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

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7.2 List of Preparers

This EIR was prepared by the City of Ukiah, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

Rincon Consultants, Inc.

Matt Maddox, AICP, MESM, Principal
Leslie Slayday, MUP, Project Manager
Elise Gustilo, Environmental Planner
Ethan Knox, Environmental Planner
Max Antono, GIS Specialist

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Appendix A

Notice of Preparation and Scoping Comments

Notice of Preparation and Scoping Meeting

Supplemental Environmental Impact Report for the Ukiah 2026 Reorganization Project

Date: May 12, 2026

To: Reviewing Agencies, Organizations, and Interested Parties

Subject: Notice of Preparation of a Draft Supplemental Environmental Impact Report

The City of Ukiah (City), as the lead agency under the California Environmental Quality Act (CEQA), will prepare a Supplemental Environmental Impact Report (SEIR) for the Ukiah 2026 Reorganization Project ("project"). Pursuant to CEQA Guidelines section 15060(d), the City has determined that a SEIR is required for the project tiered from the certified Ukiah 2040 General Plan Final EIR (SCH# 2022050556). In accordance with CEQA Guidelines Section 15082, the City has issued this Notice of Preparation (NOP) to provide responsible agencies, trustee agencies, and other interested parties with information describing the proposed project and its potential environmental effects.

The purpose of this notice is to:

1. Serve as the Notice of Preparation of a Supplemental Environmental Impact Report for the Office of Land Use and Climate Innovation (LCI), Responsible Agencies, public agencies involved in funding or approving the project, and Trustee Agencies responsible for natural resources affected by the project, pursuant to CEQA Guidelines Section 15082; and
2. Solicit comments and suggestions regarding the preparation of the SEIR, environmental issues to be addressed in the SEIR, and any other related issues, from interested parties, including interested or affected members of the public.

Project Location

The proposed project is located within and adjacent to the City of Ukiah and consists of multiple unincorporated areas located within the City's existing Sphere of Influence (SOI) but outside of current city limits. The proposed project area includes several geographically distinct areas generally located south, north-northeast, north, and east of the city boundaries. These areas are currently served by the Ukiah Valley Sanitation District, Millview County Water District, and Willow County Water District.

Figure 1 illustrates the regional location of the City of Ukiah, Figure 2 shows the proposed project area in relation to existing city limits, and Figure 3 illustrates the individual reorganization areas included in the proposed project.

Project Description

The Ukiah 2026 Reorganization Project proposes a reorganization of service territories within the City's existing Sphere of Influence and the pre-zoning of annexed unincorporated areas. The proposed project consists of two components: a Reorganization Component and a Pre-Zone Component.

The Reorganization Component would include annexation of unincorporated territories currently served by the Millview County Water District and Willow County Water District, with concurrent detachment of those territories from the respective districts. The City would also annex territory within the Ukiah Valley Sanitation District. Once at least 70 percent of the acreage of the Sanitation District is within city limits, the City would establish the Sanitation District as a subsidiary district, consistent with applicable law. The

City does not propose to annex land within the Pinoleville Rancheria and would consult with the Tribe regarding service provision to maintain existing levels of service.

The Pre-Zone Component would involve applying City land use designations and zoning districts to annexed territories concurrent with annexation. Pre-zoning would be consistent with existing Mendocino County General Plan designations, the Ukiah Valley Area Plan, and County zoning standards. The proposed project would not change allowable land uses, development intensity, or site development standards, and would not induce growth or enable development beyond what is currently permitted.

SEIR Scope

The City of Ukiah adopted the City of Ukiah 2040 General Plan and certified a Program Environmental Impact Report (State Clearinghouse No. 2022050556) that evaluated the environmental effects of buildout under the General Plan. The City of Ukiah, as Lead Agency under CEQA, has determined that the Ukiah 2026 Reorganization Project constitutes a change requiring preparation of a SEIR pursuant to CEQA Guidelines Sections 15162 and 15163. The SEIR will evaluate the environmental effects of the proposed annexations, detachments, establishment of a subsidiary district, and pre-zoning actions as the "whole of the project" under CEQA, to the extent that those effects were not adequately analyzed in the previously certified General Plan EIR.

The SEIR will assess the potential direct, indirect, and cumulative environmental impacts of the proposed project in relation to key environmental resource topics outlined in the CEQA Environmental Checklist (CEQA Guidelines, Appendix G) and listed below. Additional resource areas may be analyzed depending on the information developed through the scoping process. Mitigation measures will be identified for significant impacts, as warranted.

- Agricultural and Forestry Resources
- Hydrology and Water Quality
- Land Use and Planning
- Utilities and Service Systems

In addition to evaluation of potential impacts and identification of mitigation measures, the SEIR will discuss a reasonable range of potentially feasible alternatives to the project that may accomplish basic objectives while lessening or eliminating any potentially significant project-related impacts.

As provided in the CEQA Guidelines, the SEIR also will include other CEQA considerations including but not limited to the following information: 1) consistency with local and regional plans and policies, 2) growth inducing impacts, 3) significant unavoidable impacts, 4) significant irreversible environmental changes, 5) references and organizations/persons consulted, and 6) SEIR authors.

Opportunity for Public Review and Comment

This Notice is available for review on the City's website at: https://cityofukiah.com/ceqa-review/

The City of Ukiah would like to receive your input on the scope of the information and analysis to be included in the SEIR. Due to time limits, as established by CEQA, your response should be sent at the earliest possible date, but no later than 30 days after publication of this notice. Please submit your comments **by 5:00 p.m. on June 10, 2026** by mail or e-mail to:

Maya Simerson, Project and Grant Administrator
City of Ukiah
300 Seminary Avenue
Ukiah, California 95482
MSimerson@cityofukiah.com

Please include the name, phone number, and address of a contact person in your response.

SEIR Public Scoping Meeting

The City will hold a public SEIR scoping meeting in-person to provide an opportunity for agency staff and interested members of the public to submit verbal comments on the scope of the environmental issues to be addressed in the SEIR. The scoping meeting will be held on **June 1, 2026 at 5:00 PM at the Ukiah Valley Conference Center, located at 200 S. School Street, Ukiah, California 95482.**

Figure 1 Regional Location

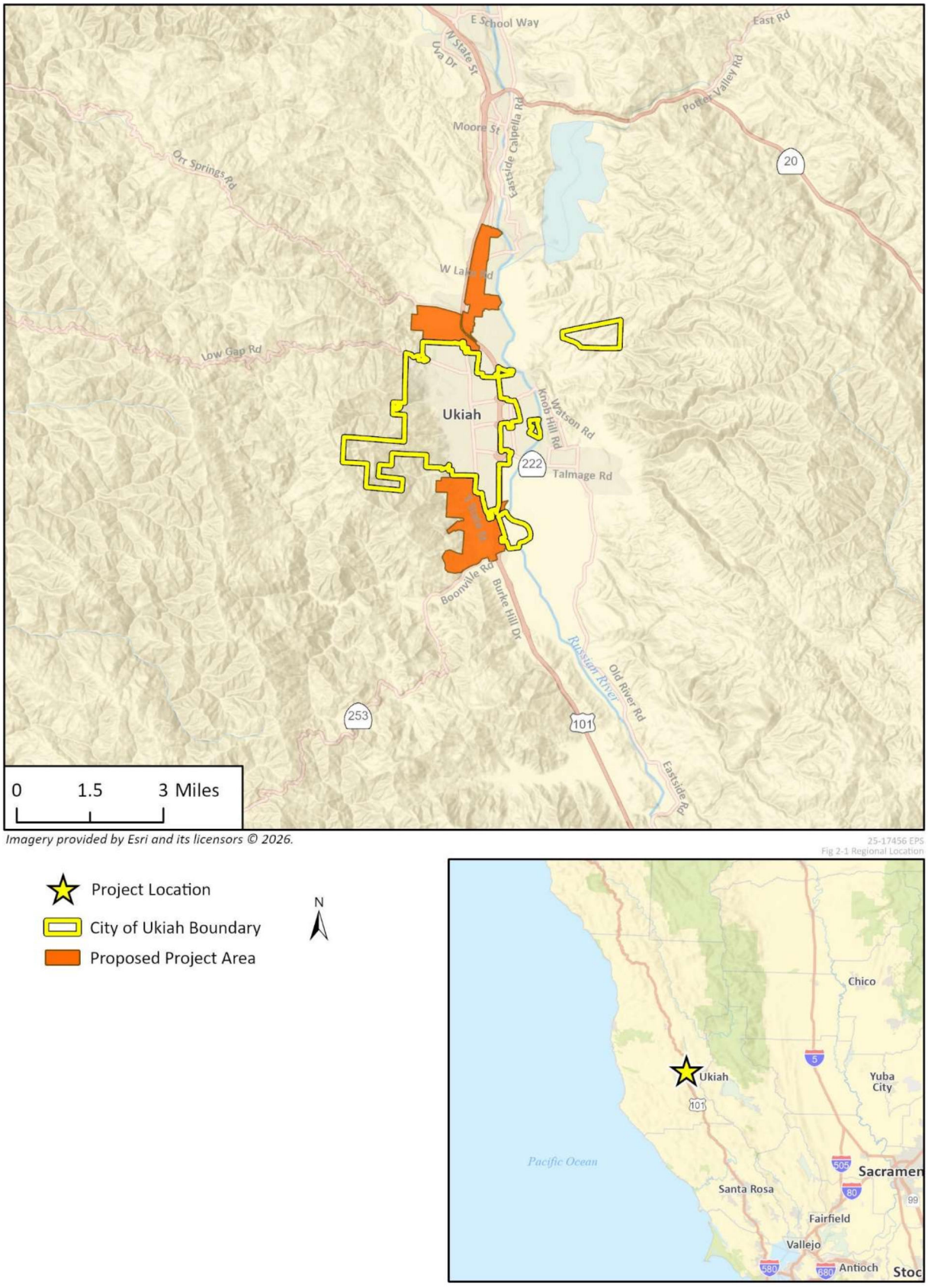
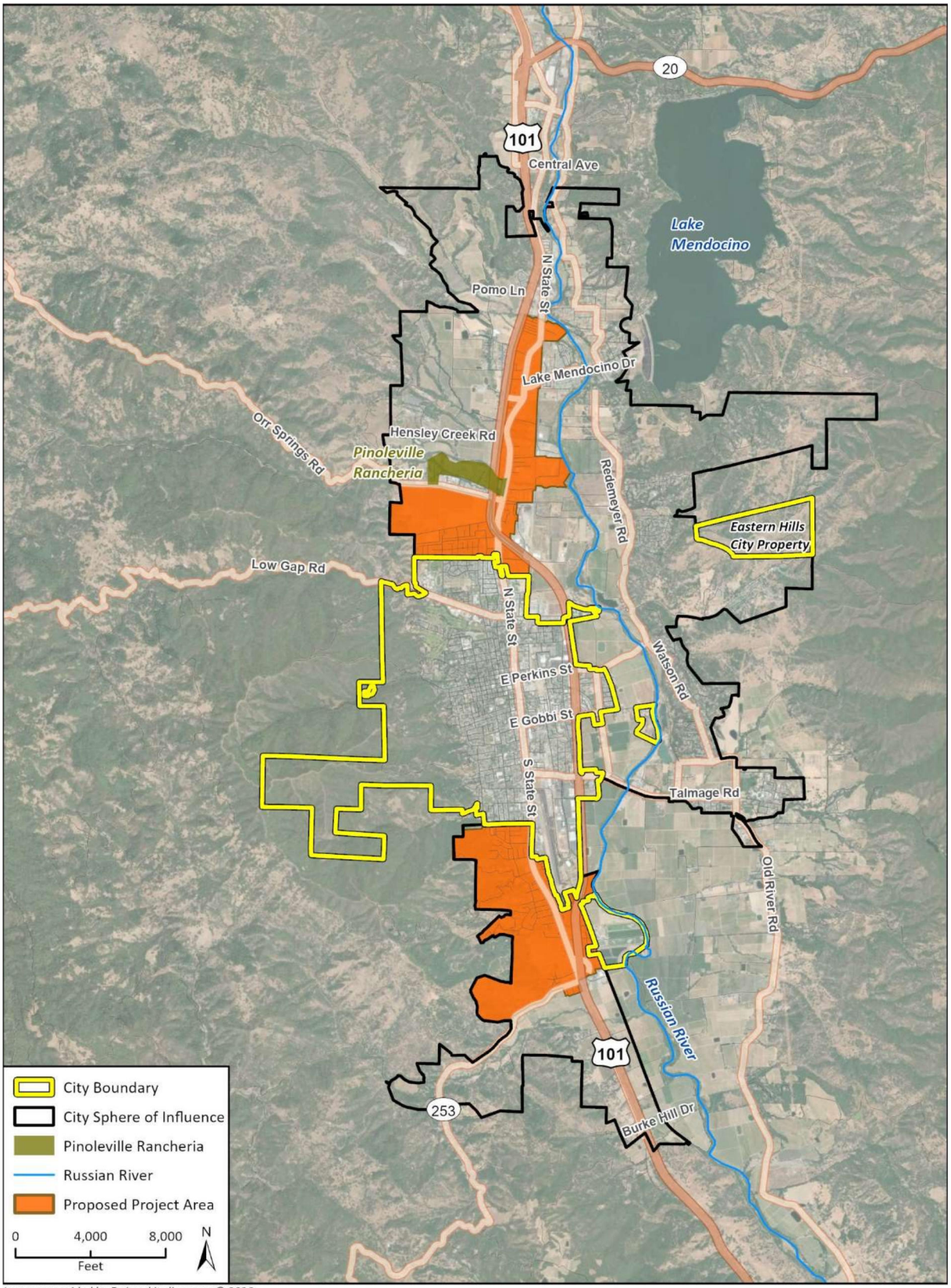


Figure 2 Project Area (Proposed Annexation Area)



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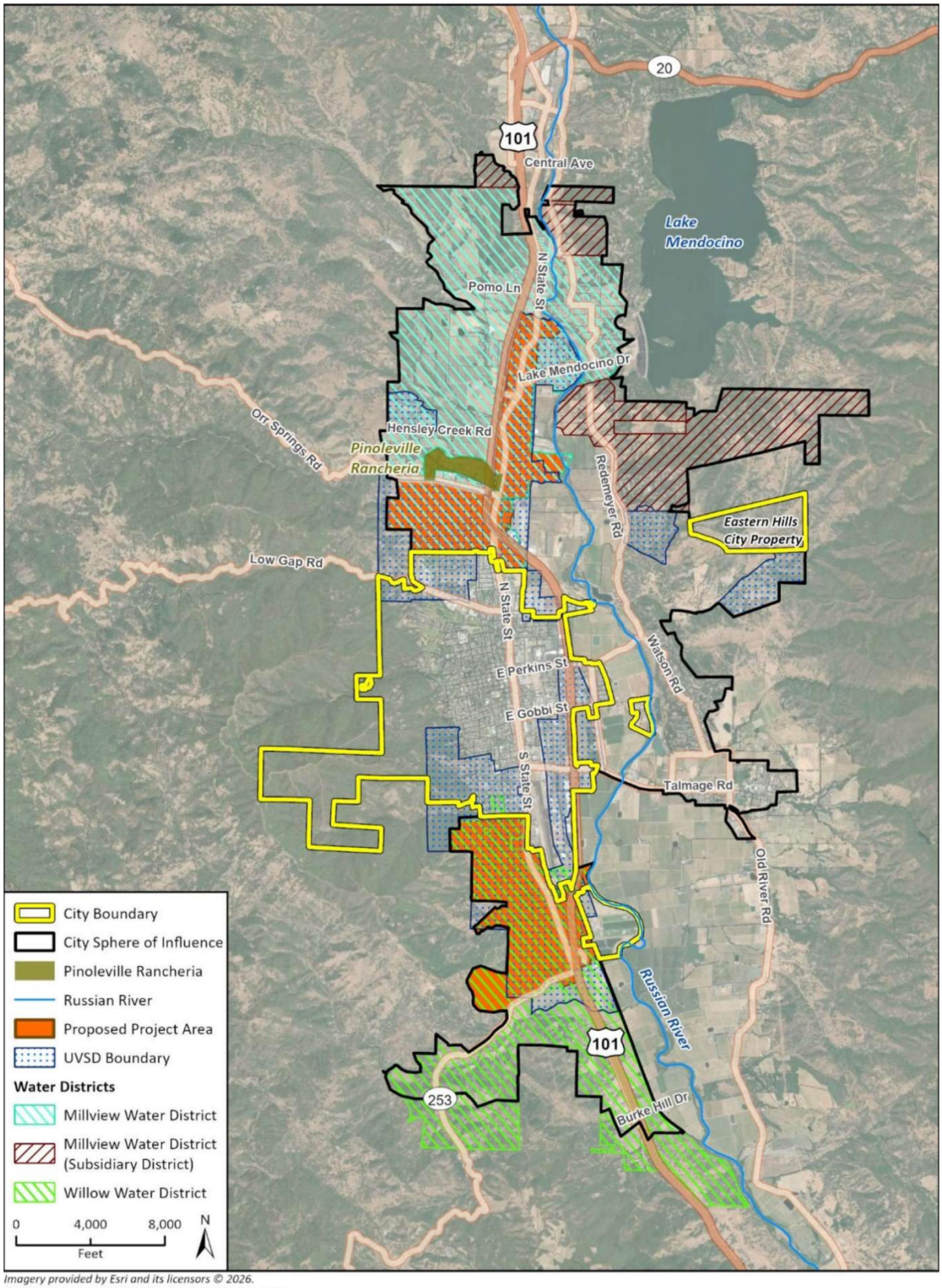
Additional data provided by County of Mendocino, 2026.

Figure 3 Project Reorganization Detail



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Additional data provided by County of Mendocino, 2026.

NATIVE AMERICAN HERITAGE COMMISSION

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CALIFORNIA 95691
(916) 373-3710
NAHC@NAHC.CA.GOV

May 21, 2026

Maya Simerson
City of Ukiah

Via Email to: MSimerson@cityofukiah.com

Re: 2022050556, Ukiah 2026 Reorganization Project, Mendocino County

To Whom It May Concern:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project**.**
- **b.** Recommended mitigation measures**.**
- **c.** Significant effects**.** (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions, please contact me at my email address: melina.carlos@nahc.ca.gov

Sincerely,

Melina Carlos

Melina Carlos
Cultural Resources Analyst

cc: State Clearinghouse

Mendocino County Farm Bureau

June 8, 2026
Maya Simerson, Project and Grant Administrator
City of Ukiah
300 Seminary Avenue
Ukiah, California 95482

Re: MCFB comments on SEIR scoping

Dear Mrs. Simmerson and city staff,

Mendocino County Farm Bureau is submitting these comments regarding the Supplemental Environment Impact Report (SEIR) being prepared for the proposed Ukiah 2026 Reorganization Project.

While we appreciate that most, but not all, of the farmland that was included in the initial proposal has been removed from the current proposal, many of the concerns that we expressed have not been addressed. We are hoping some of these concerns will be adequately analyzed in the SEIR. We have listed our concerns and what we want to see analyzed below.

1. Land Use/Planning and Aesthetics-We acknowledge that the City of Ukiah has adopted a Right to Farm ordinance, Right to Industry ordinance and Mendocino County Inland Zoning Code as a part of pre-zoning ahead of any annexation. While this allows annexed residents to maintain the same entitlements they currently enjoy, some of those entitlements, such as raising backyard livestock, require permits and fees which are not required by the County. We are concerned that the City of Ukiah will adopt new zoning ordinances soon after any annexation is approved. There is potential for annexation to accelerate residential development in areas currently under County jurisdiction which could negatively impact our rural character and community identity. We want the areas where this could happen to be identified.

2. Transportation/Traffic- While annexation/reorganization does not immediately lead to proposed development which would impact traffic, it has the potential to accelerate development which would impact traffic. We also have concerns over the city's ability to take on the maintenance of any roads currently under county jurisdiction and want to see a roads maintenance plan.

455 E. Gobbi Street • Ukiah, CA 95482 • (707) 462-6664 • Email: admin@mendofb.org
Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

3. Agriculture and Forestry Resources-This current proposed annexation/reorganization has removed most of the agricultural zoned lands but there is still the potential for developments spurned by reorganization to lead to conflict between newly developed residential areas adjacent to commercial agricultural lands leading to complaints over noise, pesticide applications, dust, etc. that arise from normal farm business operations.

4. Public Services-We question the city's ability to provide adequate law enforcement to newly annexed areas. There are a few areas, such as the Brush Street triangle and Orr Creek Commons, that were not included in the current proposed annexation which seemed like they should have been. We want to see a plan that outlines how the city will staff up to provide adequate law enforcement to these areas. We also are concerned about the fiscal impact on the county which would negatively impact the county's ability to provide the level of service currently supplied to county residents. We want to see a detailed financial analysis of how the proposed annexation/reorganization would impact county finances, and by extension, their ability to provide services.

5. Hydrology/Water Quality- Agriculture requires secure water supplies and availability. We are concerned that growth induced by the annexation/reorganization would negatively affect water available for agriculture. We want water supplies, supply allocations, and future water needs to be analyzed.

6. Reasonable Alternatives- During the negotiations that led to the adoption of the Master Tax Sharing agreement, there was a proposed map for potential annexation/reorganization that was a much smaller footprint than what is being proposed. We would like that original area to be analyzed or any other prudent alternative that is much smaller in size than what is currently being looked at.

While the current proposal is smaller in scope than the original, we still have concerns about the lack of an open and public process in its development and the lack of public input and transparency.

We respectfully request that these comments be included in the administrative record and the issues that we identified be fully analyzed.

Thank you for the opportunity to comment.

Respectfully,

Adam Gaska, Executive Director
Mendocino County Farm Bureau

Bill Pauli, Land Use Chair
Mendocino County Farm Bureau

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Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

Leslie Slayday

From: Matt Maddox
Sent: Monday, June 8, 2026 4:17 PM
To: Leslie Slayday
Subject: FW: [EXT] FW: Annexation

Follow Up Flag: Follow up
Flag Status: Flagged

Matt Maddox, AICP, MESM
Principal
mmaddox@rinconconsultants.com
805-644-4455 Main | 916-204-9142 Mobile | 916-706-1374 Direct
Sacramento, California

OOO Alert: 6/22-6/30; 7/20-7/24

From: Craig Schlatter <cschlatter@cityofukiah.com>
Sent: Monday, June 8, 2026 3:50 PM
To: Matt Maddox <mmaddox@rinconconsultants.com>
Cc: Philip Williams <pwilliams@azimuslaw.com>; Maya Simerson <msimerson@cityofukiah.com>; Jesse Davis <jdavis@cityofukiah.com>
Subject: [EXT] FW: Annexation

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-----Original Message-----
From: Jarchain <jarchain@comcast.net>
Sent: Friday, June 5, 2026 7:27 PM
To: Craig Schlatter <cschlatter@cityofukiah.com>
Subject: Annexation

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I have concerns on what will happen to the areas of Ukiah that are not being annexed and will lose County dollars that will now go to the City. The residents in this part of Ukiah do not want our services cut or increased for lack of County dollars that they will be losing if this annexation goes through. Also I believe that residents of the unannexed areas should have a say on residents losing that additional revenue.

Joyce Archain
3551 Eastside Calpella
Ukiah

Sent from my iPhone

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To City of Ukiah

Attn: Craig Schlatter, Community Services Director

RE: proposed 2026 Reorganization Project California Environmental Quality Act (CEQA) process SEIR

Please provide answers to the following environmental impacts in the SEIR

What are the environmental impacts of following:

1. Adding water supply to the underserved areas to be annexed into the City of Ukiah
2. Adding sewer service to the underserved areas to be annexed into the City of Ukiah
3. Adding electrical service to the underserved areas to be annexed into the City of Ukiah.
4. Adding police protection, increased police patrols and police surveillance to the underserved areas to be annexed into the City of Ukiah
5. Adding infrastructure support to the underserved areas to be annexed into the City of Ukiah on the sewer, water, electricity and police services currently supplied to the residents and businesses within the existing City of Ukiah
6. Adding growth from undeveloped lands to the available resources, i.e., water, sewer, electricity, roads/streets and police services into the City of Ukiah
7. Developing additional services, i.e., water, sewer, electricity and roads/streets to serve underserved areas to be annexed into the City of Ukiah
8. Cumulative impacts of increasing city staff employees to cover the increase in services provided to the underserved areas to be annexed into the City of Ukiah
9. Policing non-compliant existing land uses to conform to City of Ukiah code requirements
10. Retrofitting and or replacing existing structures and land uses to comply with City of Ukiah ordinances
11. Adding existing County of Mendocino served land areas into the City of Ukiah
12. Reducing the service areas of county water districts and the sewer district.
13. Increased road surface maintenance and improvement to accommodate adding underserved areas to be annexed into the City of Ukiah.
14. Eliminating businesses and manufacturing due to City of Ukiah taxation, license fees and or regulations.

15. Jerrymandering the annexation boundaries to delete neighboring properties due to land use or political considerations i.e., lack of contribution to sales tax revenue and or business license revenue.
16. Reducing available agricultural lands by annexation into the City of Ukiah.
17. Annexing lands served or underserved, to the City of Ukiah for the sole purpose of revenue enhancement.
18. Mismanagement and overregulation by the City of Ukiah on lands currently served by the County of Mendocino, the businesses, residences and open space located therein.
19. Cumulative impact of significant increase of population to the finances of the City of Ukiah to serve existing city residents.

Respectfully submitted,

Jim Ronco

June 1, 2026

Maya Simerson
Project and Grant Administrator
msimerson@cityofukiah.com
City of Ukiah
300 Seminary Avenue
Ukiah, CA 95482

RE: Public Comment for COU Annexation Scoping Session 06.01.26

I am writing as a property owner directly affected by the City of Ukiah's proposed annexation. I own both agriculture-zoned land with an established vineyard and industrial-zoned land that supports my car restoration business, wine storage business and commercial lease. None of these properties have ever been under City of Ukiah jurisdiction or regulation.

I strongly object to the annexation of my properties. This is an Annexation of the unwilling! And it appears to be primarily a revenue-driven effort to expand the City's tax base against the express wishes of affected property owners. I request that the Supplemental Environmental Impact Report (SEIR) fully and transparently analyze the following issues as part of the scoping process:

- **Direct impacts on existing agricultural operations**: My property includes actively farmed agriculture-zoned land with a producing vineyard that has operated successfully for years under County jurisdiction. Annexation would subject this land to City of Ukiah regulations, permitting requirements, fees, and policies for the first time. I request that the SEIR thoroughly analyze the direct, indirect, and cumulative impacts on ongoing agricultural operations, including potential changes to water use, irrigation practices, pest management, frost protection, harvesting activities, and other normal farming practices.
    - Of particular concern is the risk that new City rules, restrictions, or increased costs could substantially diminish the economic viability and value of my vineyard — effectively functioning as a regulatory taking or inverse condemnation without compensation. The SEIR

should evaluate whether annexation would interfere with my reasonable investment-backed expectations, result in a significant diminution of property value, or otherwise constitute a de facto taking of my agricultural enterprise. This analysis must include the permanent loss or impairment of productive agricultural land and compliance with state policies protecting farmland (e.g., Williamson Act considerations if applicable).

- **Impacts on existing industrial and commercial uses**: My car restoration and wine storage businesses operate on industrial-zoned land outside City limits. The SEIR should analyze how City regulations, zoning overlays, business licensing, building codes, and fees would affect these established operations, including any compliance costs or operational changes required post-annexation.

- **Fiscal impacts on property owners**: The SEIR must include a clear, property-specific analysis of expected increases in property taxes, assessments, development impact fees, and other City-imposed costs versus the level of services that would actually be provided. Claims of fiscal benefit to the City should not override the direct financial burden on unwilling property owners.

- **Infrastructure and service extensions**: Any required extension of City water, sewer, roads, or other infrastructure to serve annexed areas must be fully evaluated for cost, who will bear those costs, and whether current City systems have adequate capacity without negatively affecting existing City residents.

- **Alternatives to annexation**: The SEIR should analyze alternatives that do not include involuntary annexation of privately owned, productive agricultural and industrial lands, including maintaining the current County jurisdiction.

The public has had extremely limited meaningful opportunity to weigh in before the Notice of Preparation was filed. We only had one very disorganized meeting. I urge the City to extend the scoping period, hold additional public meetings in the affected areas, and ensure the SEIR provides a thorough, unbiased evaluation of these impacts rather than serving as a procedural step toward pre-determined annexation.

Annexation should not be used to force higher taxes and new regulations onto productive property owners who have successfully operated outside City limits for years. My properties are not blighted or in need of City intervention—they are active, contributing agricultural and business assets.

Thank you for considering these comments during the scoping process. I request written acknowledgment that these issues will be addressed in the SEIR.

Respectfully submitted,

Julie Golden
Property Owner: Vineyard, Car Restoration, and Wine Storage
P.O. Box 340, Hopland, CA 95449
julie@goldenvineyards.com
(707) 272-8815

Leslie Slayday

From: Leslie Slayday
Sent: Tuesday, June 9, 2026 10:16 AM
To: Leslie Slayday
Subject: FW: [EXT] FW: Annexation - REIR

From: Marcia Morgan Lazaro <marciamorganlazaro@gmail.com>
Sent: Monday, June 8, 2026 4:24 PM
To: Craig Schlatter <cschlatter@cityofukiah.com>
Cc: John Lazaro <lazaro.john@outlook.com>
Subject: Annexation - REIR

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Good afternoon, Craig.

After reviewing the City's website page on the proposed annexation, and giving more thought to the conversation I had with Jesse Davis and Kim Larue as we walked to our cars after the June 2 meeting, certain concerns still arise for our family. How these fit in to the REIR is not totally clear to me but perhaps they will be more apparent to you.

1. Reading Shannon's email, and I believe this is mentioned on your website as well, we would like to see Mr. Maddox or you define the City of Ukiah's "Sphere of Influence." What does this "sphere" include, is it ridge to ridge of the Ukiah Valley, is it distance from commercial shopping areas, is it a radius from the heart of town? The new map is still very ambitious but does not clearly show why these annexation targets would benefit from being annexed or what the City's goals are. One could guess that the City's sphere of influence is broad because of the daily draw into City limits because of the County seat, hospital, and shopping, but your annexation plans left out the College. On the south side of town, you clearly are pulling in the residential areas that have higher density but on the north side you left out the new developments along Lake Mendocino Drive. So what is the City's sphere of influence that would create and define the new version of your annexation plans?

2. How will wildfire events be handled if the current annexation map is adopted. We live 1 mile out on Boonville Road and on Friday saw a beautifully swift response to an afternoon fire at 2401 Boonville Road. Whose responsibility will it be to handle wildfire events as you reach up into the western hills and down Boonville Road. What was the motivation to make the turn down Boonville Road and using Highway 253 as the boundary? Why are our neighbors on the north side of 253 included in the annexation but not those of us across the street…except for Fireside Village which would fall under the City's desire to have all of the higher density neighborhoods. How will the annexation affect those of us outside your limits when you are reaching further into the urban woodlands, how does the annexation change the jurisdiction for fire fighting, policing and first responders?

3. Jesse mentioned that most of the people who got up and spoke lived outside the proposed annexation map, as do we. However, we own properties inside City limits and I also have a 7-plex on N Bush that will be inside the proposed annexation. Will the REIR address not just how the areas within the annexation are affected but also how those properties left out of the annexation will be impacted. As the City grows its boundaries and collects a greater share of County property and sales taxes, what affect will that have on the County's budget and ability to meet the needs of those of us living outside your new boundaries? That includes fire, safety, utilities, etc. Will our life in the County be better because the City is sharing more of the load of providing services?

Everyone in this community will be impacted by the City's expanded boundaries and everyone should be included in the conversation. Just because someone lives outside the proposed annexation map does not mean their life won't be impacted or that their concerns aren't viable.

4. Will the REIR be able to identify the benefits to being annexed into the City? Aside from having the ability to influence the City Council on how Ukiah will be run, I found no clear outline of how annexation will make life better for us or our tenants, both inside the City and out. Will the newly annexed areas get better police or fire services, better utility infrastructure, better housing options?

While communication isn't the job of the REIR, perhaps Mr. Maddox could provide some guidance on how City staff can work their way out of the contentious situation created within the community by the City's initial approach to annexation. It's disheartening to attend meetings like last week's.

Marcia Lazaro

Marcia Morgan Lazaro
REALTOR®
COLDWELL BANKER MENDO REALTY
(707) 972-4204

marciamorganlazaro@gmail.com

DRE #01915451

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To The City of Ukiah

From: Pinky Kushner

Comments regarding potential environmental impacts of the annexation proposed by the City of Ukiah.

Foremost, I urge the City to consider especially and precisely, with numerical details, the most reasonable project alternative: that of postponing the annexation until the City has shown, in a multi-year time period, its ability to participate and operate, with broad citizen satisfaction, the combined services for the Ukiah Valley, eg, water, sewer, garbage, police, and fire control.

1. Population: With the current restrictions on immigration, the population of the USA and especially of border states such as CA is bound to be reduced. Hence the State's mandate to build more housing in all likelihood will go down for demand will go down. As one example, already schools in Mendo county are seeing a reduction in pupils. This will only continue downwards with the current federal policy on immigration. In response, the EIR should examine carefully the population trends of the past decade in Mendocino County and make predictions as to the future population base in the next years.

2. Heat Island Effect: as more of the valley gets paved over, what changes will happen to the weather? Combined with increasing temperatures, these changes must be detailed in the EIR with appropriate compensatory mechanisms.

3. Air quality: With more pavement, more sidewalks and driveways (per Ukiah's municipal code), will degrade. By how much?

4. Lights: are a definite negative environmental effect. The City and its city lights will increase throughout the length of the Ukiah Valley. The problem will not be reduced even if the size of the proposed annexation has been reduced. Light knows no bounds, even with downward casted lights, which reflect and disperse. What effects will increasing lights at night have on avian and other animal species? What effects will increasing lights at night have on human behavior, especially on the incidence of cancer? What will be the effects on bird life and critter life, on the land that forms the gathering point—e.g., the basin of the Russian River?

6. Is there enough water? I note that in the City's just published Water Usage Draft that the City has not come into alignment with the reduction required by the State. This document demonstrates that in spite of the recycling program of the City of Ukiah, there has not been enough reduction in usage. Besides being the year 2025 being out of compliance, what will

it take to come into compliance? For instance, a minor but a major proposal might be to eliminate the Golf Course. Life without GOLF would be a major blow to the community in many ways. Other water dependent services might also be threatened.

7. The environmental analysis should include a discussion directed to people living within the proposed annexation who do not want street lights, who do not want sidewalks, who prefer a rural life style. These people should have their rights respected. The EIR should detail how these people will not be harmed by the urbanization of their rural life.

8. The environmental study must include a NO PROJECT analysis. This analysis should determine whether, by State of California law, water, sewer, trash and police services can be centralized without the proposed annexation. This analysis should consider that the consolidation of services is quite recent. This fact should be evaluated relative to the assumption of the additional new multitude of tasks involved in annexation. What the public deserves is an assurance that recently consolidated services are truly able to continue to operate effectively. This aspect of the EIR analysis should also include a description of the severe problems that the City of Ukiah and Mendocino County had over many years during the effort of the consolidation of only the trash services. The public remembers these problems and is not confident that the proposed annexation won't end up in the bickering and legal chaos that occurred during the trash services multiyear mess. So much money was consumed in this legal mess that the public had to have been harmed by it.

Not going forward at this time with annexation will allow the City the opportunity to prove that they can handle those service agencies. Surely the preferred action, the more rational action is to have no annexation at this time and to review the possibility of annexation when there is more buy in from the public.

My wife and I strongly oppose the proposed annexation. We see no benefit to this plan for property owners. The City of Ukiah cannot properly maintain its current boundaries.

Regards, Rob

Rob and Tuesday McAsey

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Leslie Slayday

From: Matt Maddox
Sent: Monday, June 8, 2026 4:17 PM
To: Leslie Slayday
Subject: FW: [EXT] FW: NO ANNEXATION!!!

Follow Up Flag: Follow up
Flag Status: Flagged

Matt Maddox, AICP, MESM
Principal
mmaddox@rinconconsultants.com
805-644-4455 Main | 916-204-9142 Mobile | 916-706-1374 Direct
Sacramento, California

OOO Alert: 6/22-6/30; 7/20-7/24

From: Craig Schlatter <cschlatter@cityofukiah.com>
Sent: Monday, June 8, 2026 3:45 PM
To: Matt Maddox <mmaddox@rinconconsultants.com>
Cc: Maya Simerson <msimerson@cityofukiah.com>; Philip Williams <pwilliams@azimuslaw.com>; Jesse Davis <jdavis@cityofukiah.com>
Subject: [EXT] FW: NO ANNEXATION!!!

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From: ROBERT & KATHY MOTHERSHED <robertandkathymothershed@comcast.net>
Sent: Monday, June 8, 2026 10:53 AM
To: Craig Schlatter <cschlatter@cityofukiah.com>
Subject: NO ANNEXATION!!!

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

I paid a lot of money to buy my property outside of the city limits. I do not want to be in the city limits of Ukiah. Stop shoving this down my throat.

Robert Mothershed
1700 Carrigan Ln.
Ukiah CA 95482

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Leslie Slayday

From: Leslie Slayday
Sent: Tuesday, June 9, 2026 10:13 AM
To: Leslie Slayday
Subject: FW: [EXT] FW: 2026 Reorganization Project

From: rsbostwick@comcast.net <rsbostwick@comcast.net>
Sent: Monday, June 8, 2026 1:41 PM
To: Craig Schlatter <cschlatter@cityofukiah.com>
Subject: 2026 Reorganization Project

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June 8, 2026

Craig Schlatter, Community Services Director
City of Ukiah
300 Seminary Avenue
Ukiah, CA 95482
RE: CEQA Scoping Comments for the Ukiah 2026 Reorganization Project

Dear Mr. Schlatter:
I am submitting these comments regarding the Supplemental Environmental Impact Report (SEIR) for the proposed Ukiah 2026 Reorganization Project.

Many residents have spent months expressing concerns about this annexation, yet City leaders continue to act as though opposition is simply the result of confusion or misinformation. The reality is much simpler: people understand what is being proposed, and many of them do not want it. Public opposition is not a communications problem for the City to solve; it is a warning sign that the community has serious concerns that deserve to be addressed.

The Supplemental Environmental Impact Report should not be treated as a formality or a box to check on the way to annexation. The SEIR must thoroughly analyze all potential impacts associated with the project, including:

1. Growth and Development Impacts – The potential for annexation to accelerate development in areas currently under County jurisdiction, including impacts on agricultural lands, open space, rural character, and community identity.

2. Public Services and Infrastructure – The ability of the City to provide adequate water, wastewater, police, fire, road maintenance, and other municipal services to annexed areas without reducing service levels elsewhere.

3. Traffic and Transportation – Potential increases in traffic, vehicle miles traveled, congestion, and roadway improvements that may result from future development enabled by annexation.

4. Water Supply and Drought Resilience – The long-term availability of water resources to serve annexed territory, particularly during periods of drought and increasing demand.

5. Fiscal Sustainability – Any environmental impacts that could result from future infrastructure expansion, service extensions, or development patterns encouraged by annexation.

6. Reasonable Alternatives – Alternatives that would reduce environmental impacts, including smaller annexation areas, phased annexation, or maintaining current jurisdictional boundaries.

In addition, I ask that the SEIR clearly identify all assumptions regarding future growth and development within the proposed annexation areas and fully disclose the environmental consequences associated with those assumptions.
The City has repeatedly claimed that this process is transparent and responsive to public input. However, many residents have come away with the opposite impression. When concerns are brushed aside, questions go unanswered, and opposition continues to grow without any meaningful change in direction, it is understandable that people lose confidence in the process. The City should stop treating community opposition as an obstacle and start recognizing it as feedback. The message from many residents has been clear for months: they do not support this annexation and want a full accounting of its impacts before any further action is taken.
I respectfully request that these comments be included in the administrative record and that the issues identified above be fully analyzed in the SEIR.

Thank you for your consideration of these comments.
Sincerely,
Ron Bostwick
2350 Road L, Redwood Valley, CA

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Leslie Slayday

From: Matt Maddox
Sent: Monday, June 8, 2026 4:17 PM
To: Leslie Slayday
Subject: FW: [EXT] FW: LAND USE IF PROPERTY IS ANNEXED INTO THE CITY.

Follow Up Flag: Follow up
Flag Status: Flagged

Matt Maddox, AICP, MESM
Principal
mmaddox@rinconconsultants.com
805-644-4455 Main | 916-204-9142 Mobile | 916-706-1374 Direct
Sacramento, California

OOO Alert: 6/22-6/30; 7/20-7/24

From: Craig Schlatter <cschlatter@cityofukiah.com>
Sent: Monday, June 8, 2026 3:49 PM
To: Matt Maddox <mmaddox@rinconconsultants.com>
Cc: Maya Simerson <msimerson@cityofukiah.com>; Philip Williams <pwilliams@azimuslaw.com>; Jesse Davis <jdavis@cityofukiah.com>
Subject: [EXT] FW: LAND USE IF PROPERTY IS ANNEXED INTO THE CITY.

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From: Steve Miller <smiller10310@yahoo.com>
Sent: Friday, June 5, 2026 6:50 PM
To: Craig Schlatter <cschlatter@cityofukiah.com>
Cc: Steve Miller <smiller10310@yahoo.com>
Subject: LAND USE IF PROPERTY IS ANNEXED INTO THE CITY.

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Craig,
One of the early comments you made in your presentation on Monday June 1st was that if property was annexed into the city that there would be NO required change of land use. How long would

this guarantee last? I'm sorry but just don't trust the city to keep their word on these matters.

Steve Miller

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City of Ukiah
300 Seminary Ave
Ukiah

RECEIVED
JUN 09 REC'D
CITY OF UKIAH
COMMUNITY DEVELOPMENT

June 7 2024

1. Population: with the current restrictions on immigration, the population of the USA and especially of border states such as CA is bound to be reduced. Hence the State's mandate to build more housing must go down or should go down. In support of this aspect of population, already schools in Mendo county are seeing a reduction in pupils.

2. Heat Island Effect: as more of the valley gets paved over, what changes will happen to the weather ?

3. Air quality with more pavement,, more sidewalks and driveways (per Ukiah's municipal code) will degrade. By how much and is this in keeping with the stated goals of the City's own General Plan? And the State's plan?

4. Lights: are a definite environmental effect. The City and its city lights will increase throughout the length of the Ukiah Valley. And the problem will not be reduced even if the size of the proposed annexation has been reduced. Light knows no bounds, even with downward casted lights, which reflect and disperse.

5. What is the effect on bird life, critter life, on the land that forms the gathering point, the basin, of the Russian River?

6. Is there enough water? I note that in the City's just published Water Usage Draft that the City has not come into alignment with the reduction required by the State. This document demonstrates that in spite of the recycling program of the City of Ukiah, there has not been enough reduction in usage. A minor but also major effect might be to eliminate the Golf Course. Life without GOLF would be a major blow to the community in many ways. Other water dependent services might also be challenged.

7. The environmental analysis should include a discussion directed to people living within the proposed annexation who do not want streetlights, who do not want sidewalks, who prefer a rural life style. These people should have their rights respected.

8. The environmental study must include a NO PROJECT analysis. This analysis should determine whether, by State of California law, water, sewer, trash and police services can all be centralized without an annexation of the proposed surrounds. This analysis should consider how recent the consolidation of services is, and evaluate this fact relative to the assumption of the new multitude of tasks that are involved in annexation. What the public deserves is an assurance that recently consolidated services are truly able to continue to operate effectively. The analysis should also include a description of the severe problems that the City of Ukiah and Mendocino County had over many years during the effort of the consolidation of the trash services. The public remembers these problems and is not confident that the proposed annexation won't end up in the bickering and legal chaos that occurred during the trash services multiyear mess. Not going forward at this time with annexation will allow the City the opportunity to prove that they can handle those service

agencies. Surely the preferred action, the more rationale action is to have no annexation at this time.

9. I.D. Water Supply and water Rights and what the City will have if the P.V. flow stops will the underflow in Ukiah dry up.?
10. I.D. the underflow of Ukiah Water, ground Water or underflow.?
11. what is the Carring Compasity of Ukiah Valley How many people Can live in the Valley, Sewer, Water, public safety etc all.
12. How much more goverment will it take To run/manage the annex are, How many more buildings, offices, and people to run/control the larger area.
13. Where is the Capital improvement plan for the Area. (20years)

Dee Howard
3900 Pardecci Rd
Ukiah Ca 95482

PS. the City has not listend to us.

I/We Ukiah annexation