

# 1 Introduction

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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**

<b>Commenter</b>	<b>Comment/Request</b>	<b>How and Where It Was Addressed</b>
<b>Agency</b>		
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, <i>Other CEQA</i> .
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, <i>Land Use and Planning</i> .
	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, <i>Other CEQA</i> .
	Expresses concern regarding potential land use conflicts between future residential development and adjacent agricultural operations.	Comments are addressed in Section 4.1, <i>Agricultural and Forestry Resources</i> .
	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, <i>Utilities and Service Systems</i> . 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, <i>Hydrology and Water Quality</i> and Chapter 5, <i>Other CEQA</i> .
	Requests consideration of a reduced annexation area or other smaller-scale alternatives.	Comments are addressed in Chapter 6, <i>Alternatives</i> .
	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.
<b>Individual</b>		
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, <i>Hydrology and Water Quality</i> , and Section 4.4, <i>Utilities and Service Systems</i> .
	Requests analysis of impacts associated with adding police protection, patrols, surveillance, and municipal services to annexation areas.	Comments are addressed in Chapter 5, <i>Other CEQA</i> .
	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, <i>Hydrology and Water Quality</i> , and Section 4.4, <i>Utilities and Service Systems</i> . Growth-inducing impacts are addressed in Chapter 5, <i>Other CEQA</i> .
	Requests analysis of cumulative impacts associated with increased City staffing and municipal services.	Comments are addressed in Chapter 5, <i>Other CEQA</i> .

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, <i>Land Use and Planning</i> .
	Requests analysis of impacts associated with reducing County water and sewer service areas.	Comments are addressed in Section 4.4, <i>Utilities and Service Systems</i> .
	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, <i>Agricultural and Forestry Resources</i> .
	Expresses concern regarding population growth and financial impacts on the City and existing residents.	Comments are addressed in Chapter 5, <i>Other CEQA</i> . 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, <i>Agricultural and Forestry Resources</i> , and Section 4.2, <i>Hydrology and Water Quality</i> .
	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, <i>Land Use and Planning</i> . 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, <i>Hydrology and Water Quality</i> , Section 4.4, <i>Utilities and Service Systems</i> and Chapter 5, <i>Other CEQA</i> , .
	Requests consideration of alternatives that avoid annexation of agricultural and industrial lands.	Comments are addressed in Chapter 6, <i>Alternatives</i> .
	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, <i>Land Use and Planning</i> .
	Requests analysis of wildfire response, emergency services, and jurisdictional responsibilities associated with annexation.	Comments are addressed in Section 4.4, <i>Utilities and Service Systems</i> .
	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.

<b>Commenter</b>	<b>Comment/Request</b>	<b>How and Where It Was Addressed</b>
	Requests analysis of the benefits and service implications associated with annexation, including police, fire, utilities, and housing.	Comments are addressed in Section 4.4, <i>Utilities and Service Systems</i> .
	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, <i>Alternatives</i> .
	Requests analysis of population trends and future housing demand.	Comments are addressed in Chapter 5, <i>Other CEQA</i> .
	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, <i>Other CEQA</i> .
	Expresses concern regarding the availability of water supplies to accommodate future growth and development.	Comments are addressed in Section 4.2, <i>Hydrology and Water Quality</i> and Chapter 5, <i>Other CEQA</i> .
	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, <i>Land Use and Planning</i> .
	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, <i>Alternatives</i> . Fiscal and economic issues that do not result in a physical environmental impact are outside the scope of CEQA review.
Rob McCCasey	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, <i>Utilities and Service Systems</i> .
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, <i>Agricultural and Forestry Resources</i> , Section 4.3, <i>Land Use and Planning</i> , and Chapter 5, <i>Other CEQA</i> .
	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, <i>Hydrology and Water Quality</i> , and Section 4.4, <i>Utilities and Service Systems</i> .
	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, <i>Other CEQA</i> .
	Expresses concern regarding long-term water supply availability and drought resilience.	Comments are addressed in Section 4.2, <i>Hydrology and Water Quality</i> .

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, <i>Utilities and Service Systems</i> .
	Requests consideration of alternatives that reduce environmental impacts, including smaller annexation areas, phased annexation, and maintaining existing boundaries.	Comments are addressed in Chapter 6, <i>Alternatives</i> .
	Requests disclosure of assumptions regarding future growth and development within annexation areas.	Comments are addressed in Chapter 5, <i>Other CEQA</i> .
	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, <i>Land Use and Planning</i> .
Lee Howard	Expresses concern regarding population trends, housing demand, and future population growth in Mendocino County.	Comments are addressed in Chapter 5, <i>Other CEQA</i> .
	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, <i>Land Use and Planning</i> , and Chapter 5, <i>Other CEQA</i> .
	Expresses concern regarding impacts to air quality, wildlife, and the Russian River basin associated with future urbanization.	Comments are addressed in Section 4.2, <i>Hydrology and Water Quality</i> and Chapter 5, <i>Other CEQA</i> .
	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, <i>Hydrology and Water Quality</i> .
	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, <i>Land Use and Planning</i> .
	Requests consideration of a No Project Alternative and analysis of whether services could be consolidated without annexation.	Comments are addressed in Chapter 6, <i>Alternatives</i> .
	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, <i>Utilities and Service Systems</i> .
<b>Scoping Meeting</b>		
	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, <i>Land Use and Planning</i> .
	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, <i>Hydrology and Water Quality</i> , and Section 4.4, <i>Utilities and Service Systems</i> .

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, <i>Other CEQA</i> .
	Expresses concern regarding additional VMT and vehicle trips.	Comments relevant to CEQA are addressed in Chapter 5, <i>Other CEQA</i> .
	Expresses concern regarding increase in tourism and associated increase in emissions.	Comments relevant to CEQA are addressed in Chapter 5, <i>Other CEQA</i> .
	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, <i>Land Use and Planning</i> .

## 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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