

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 (CO₂) 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 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. 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 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. 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 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. 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.