

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

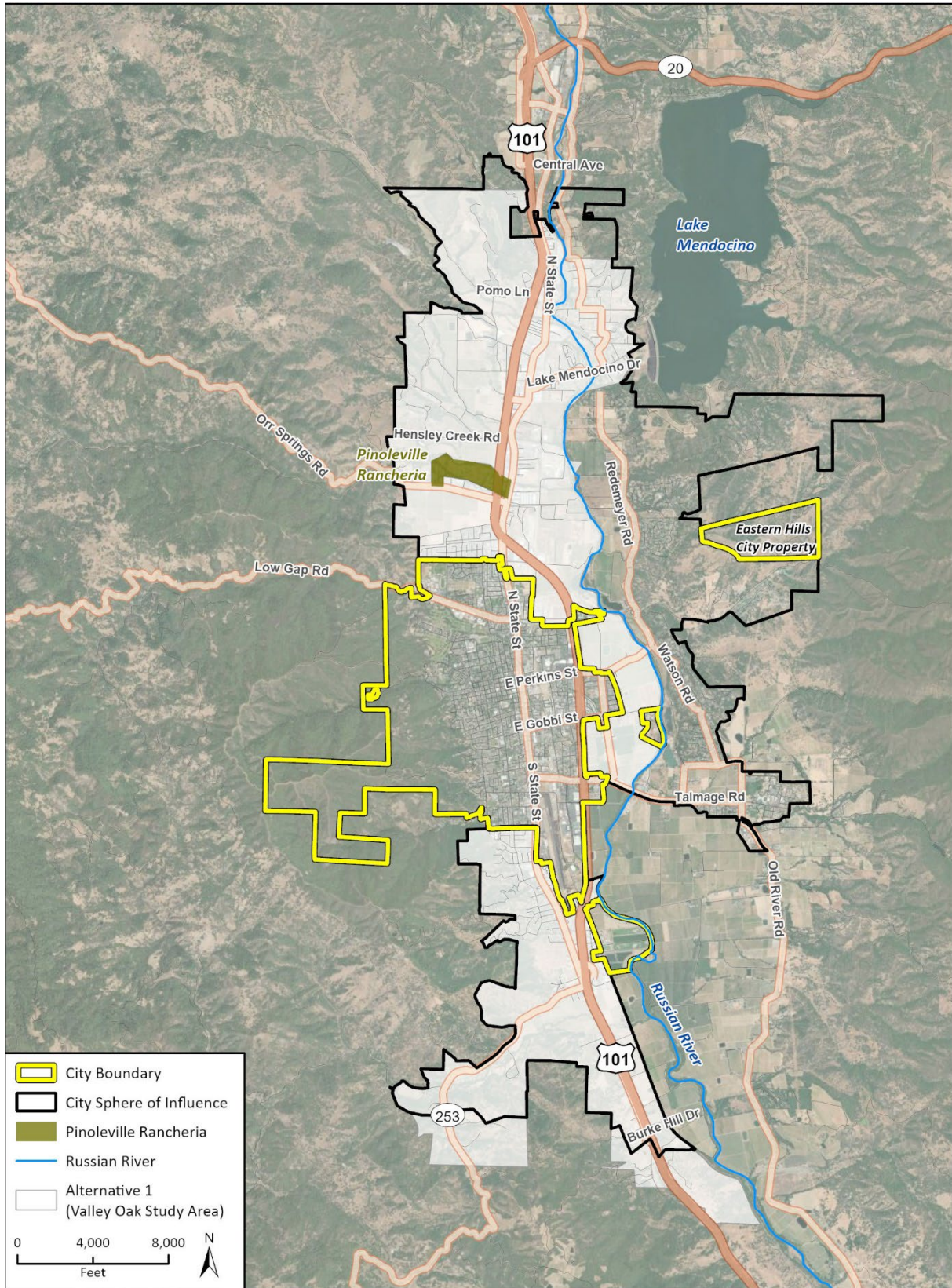
Overall, the No Project Alternative would result in similar environmental impacts than the proposed project but would not fulfill the purpose of the project.

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.

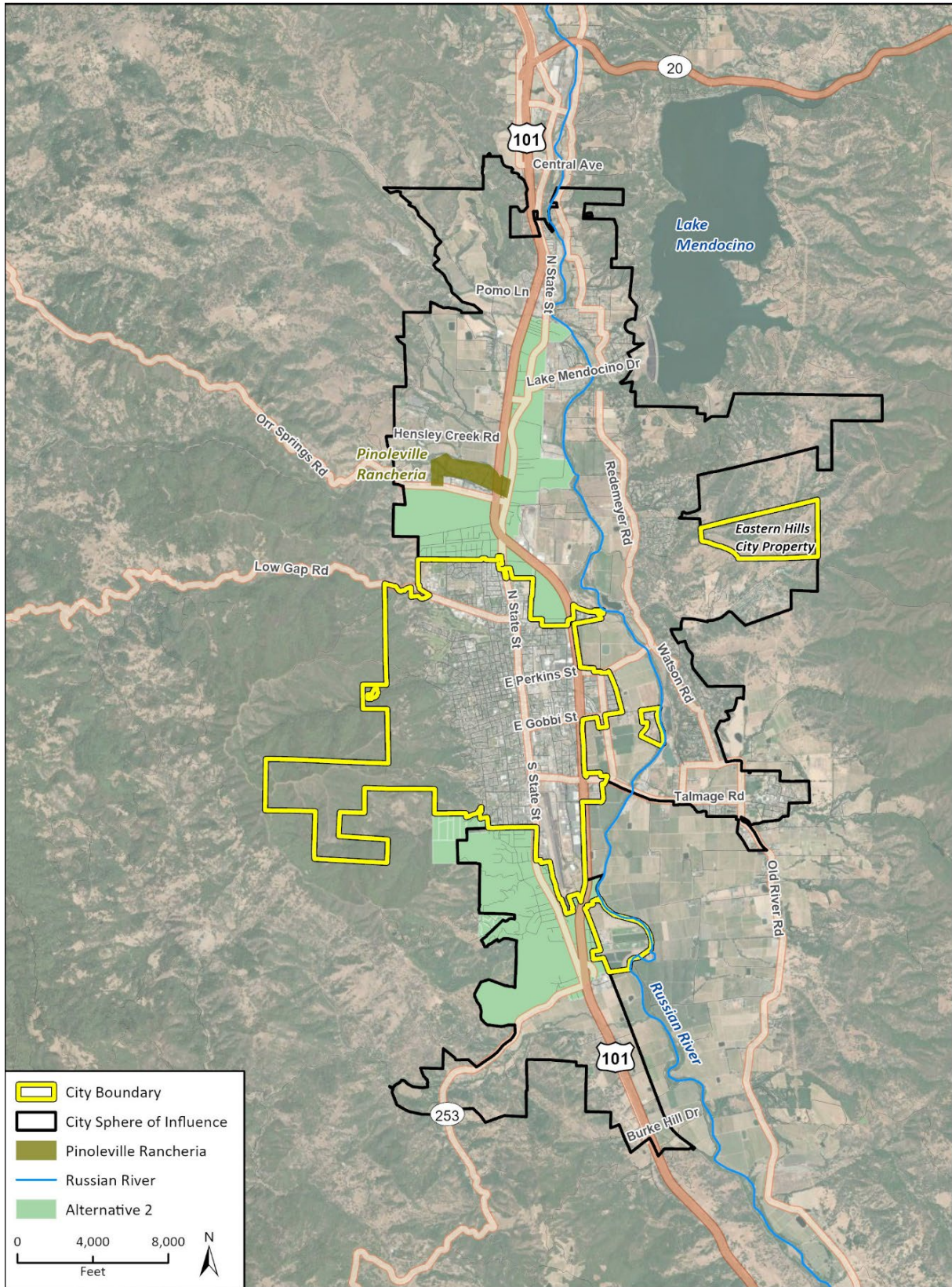
f. Summary

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



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.

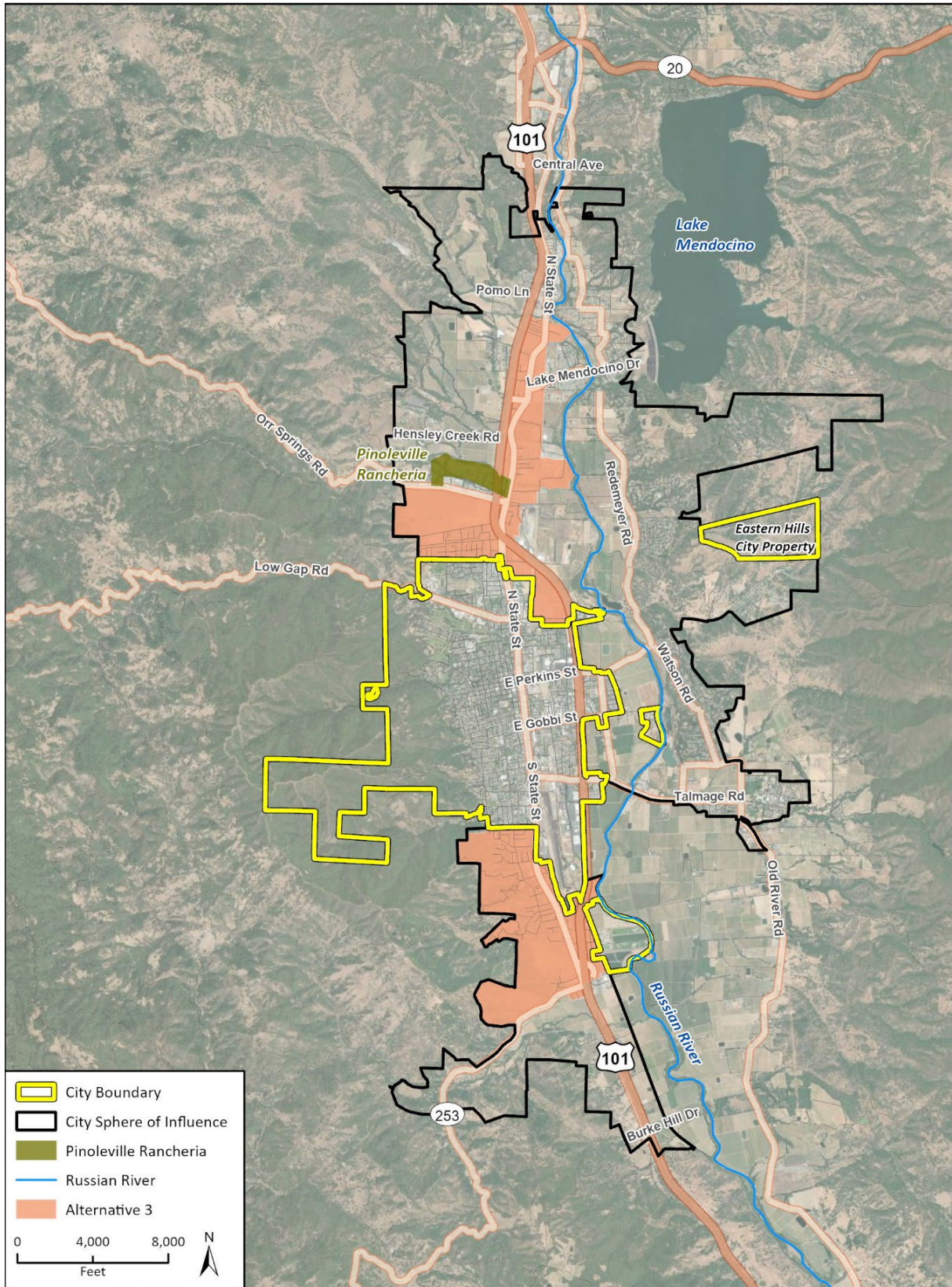
f. Summary

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.

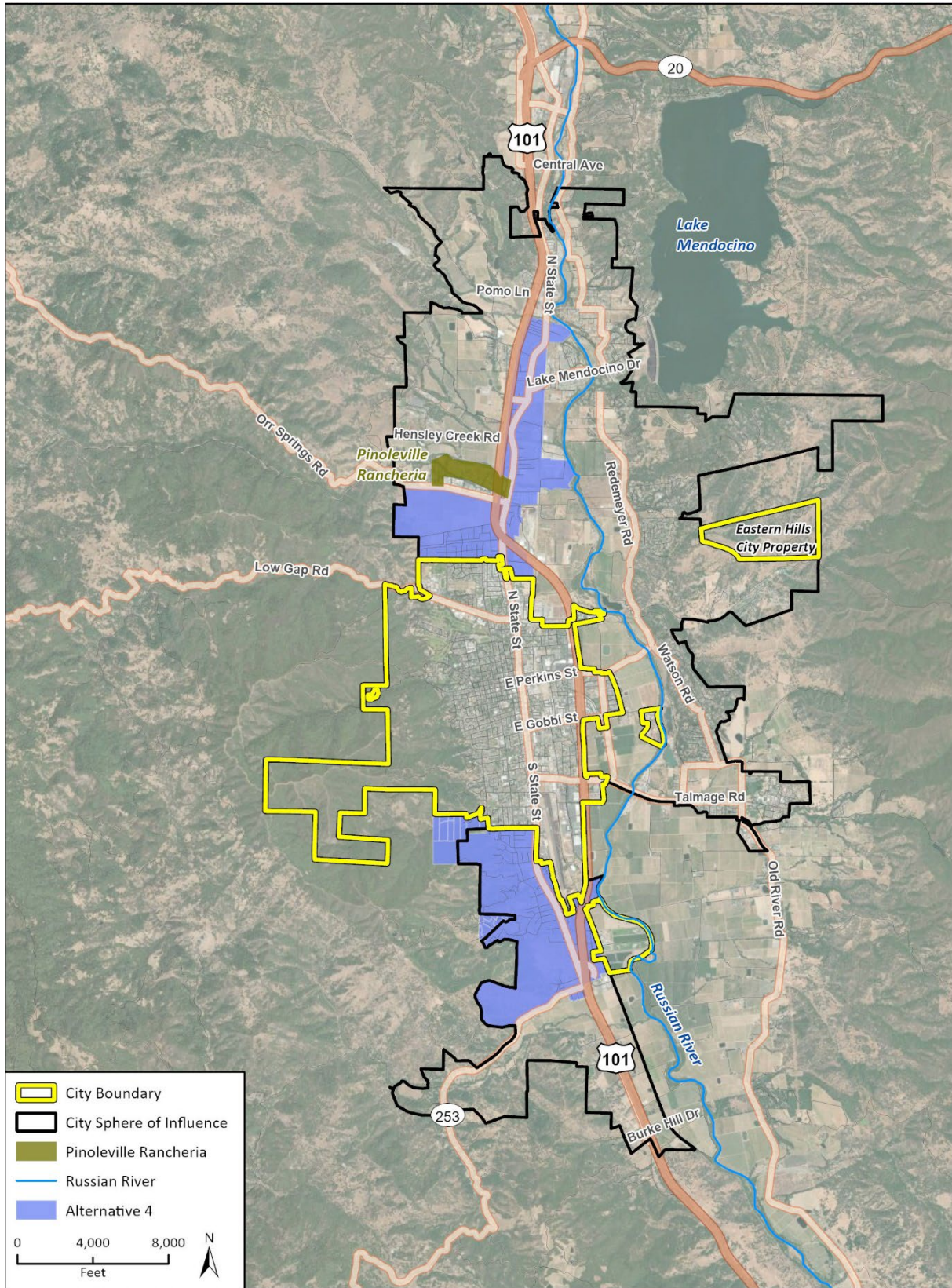
f. Summary

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.

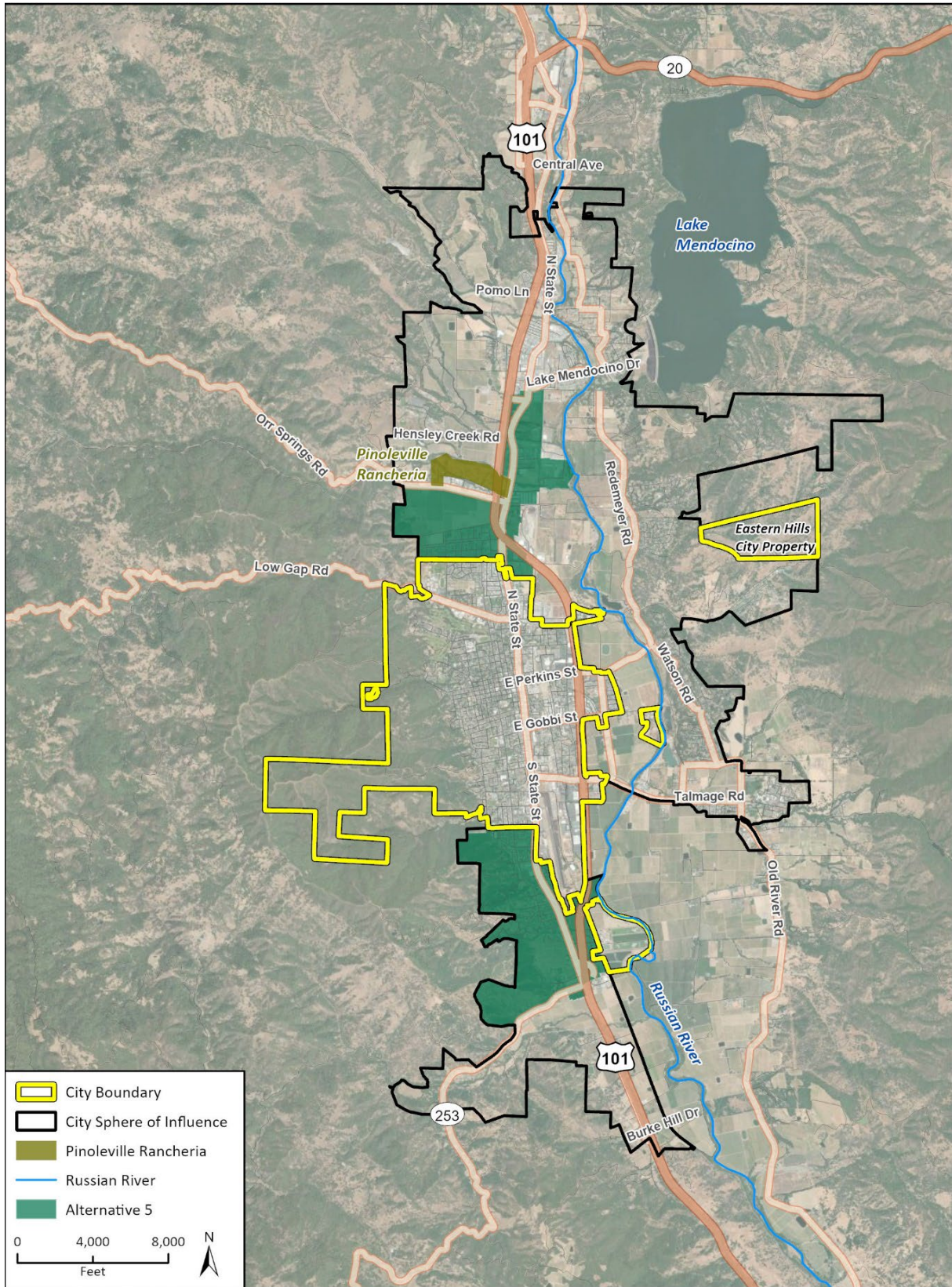
f. Summary

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.

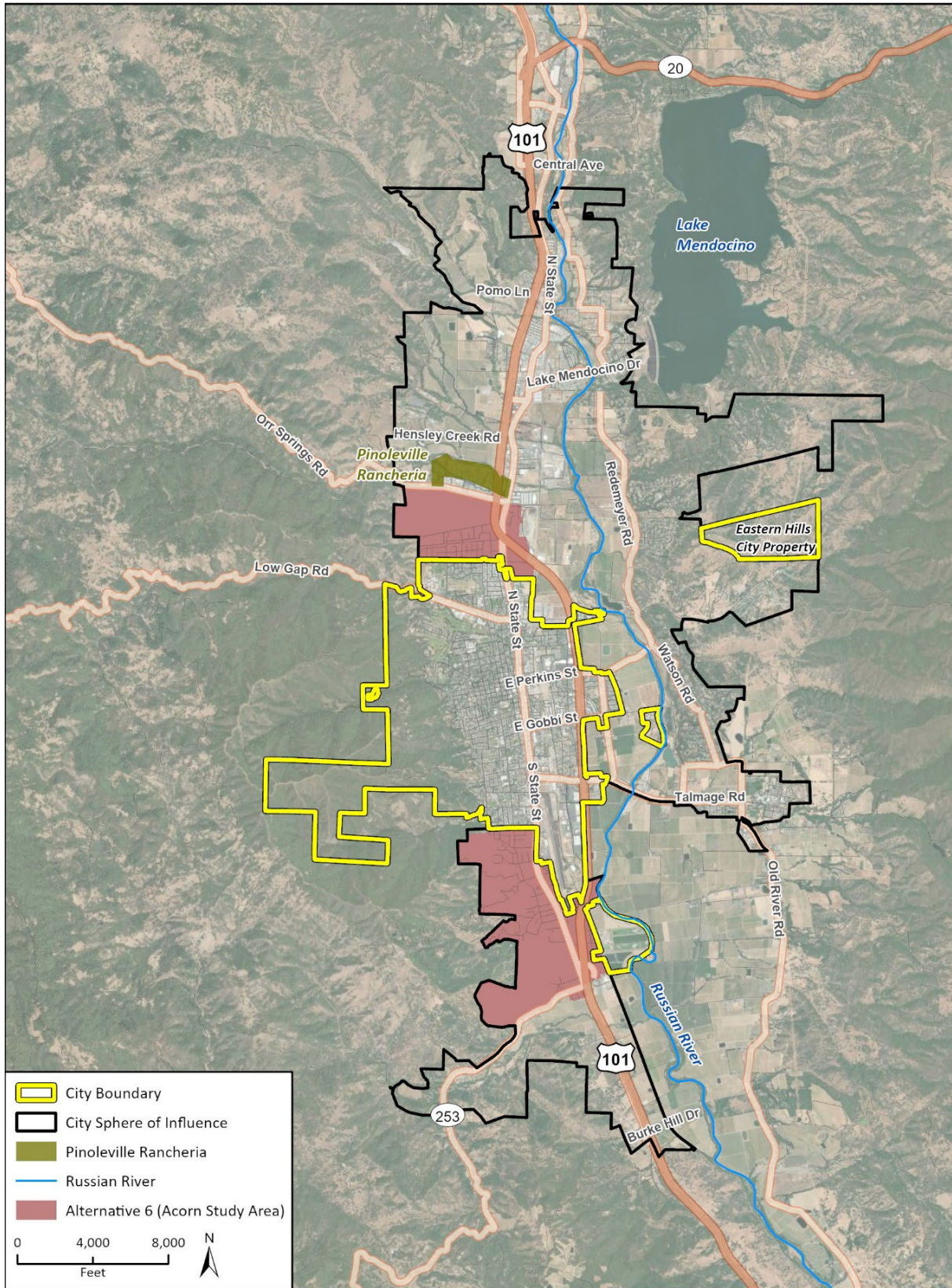
f. Summary

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



Imagery provided by Esri and its licensors © 2026.
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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