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**Sent:** Monday, February 28, 2022 4:07 PM  
**To:** Uma Hinman  
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**Subject:** LAFCO board meeting for 3/2/2022, Agenda Item 3b

**Flag Status:** Flagged

LAFCo Board of Directors,

This is a response to the February 2022 City of Ukiah General Plan Update, Land Use Alternatives, and proposed Sphere of Influence boundary.

Ukiah is updating their General Plan and in the Land Use section the city proposes a new sphere of influence. The purpose of the sphere of influence is to ensure the provision of efficient services while discouraging urban sprawl, leapfrog sprawl, island development, and the premature conversion of agricultural and open space lands by preventing overlapping jurisdictions and duplication of services. LAFCOs coordinate the orderly development of a community through reconciling differences between agency (Ukiah) plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.

A SOI indicates an agency's probable future physical boundary and service area. It is also the area where the local government will build facilities and deliver services sometime in the reasonably near future. Factors considered in a sphere of influence review focus on the current and future land use, the current and future need and ability for service, and any relevant communities of interest. It is not all the land which the city views as affecting their existing services.

The SOI for Ukiah has been under review since 2014 without resolution because Ukiah has not provided documents requested by LAFCO to justify its proposed SOI. LAFCO has not agreed with the city regarding their plan. In all of California no city has claimed they plan to annex the area that Ukiah is claiming for future annexation. State law requires LAFCOs to, as necessary, review and update spheres every five years, and Ukiah has not updated theirs for 34 years, since 1984.

I am sure the city is trying to control the potential for sprawl with such a far-reaching Sphere of Influence boundary, but it also has the appearance and potential under other leadership to use the boundary to support sprawl.

At a Special Planning Meeting for the City Council (1/16/2020), the Executive Director of LAFCO stated that the proposed Ukiah Sphere of Influence may not be legal and therefore not be approved by LAFCO as proposed. Today, in February 2022, the city is proposing another SOI in the draft General Plan Update, Land Use Alternatives Memorandum. This current version is reduced from the 'mountaintop to mountaintop' proposal in 2014 to another indiscriminate border stretching way beyond what could be considered a 'reasonable' area for adding services which includes most of the flat areas and open space in the Ukiah Valley.

This current proposed boundary includes a massive amount of underdeveloped rural residential areas in the eastern hills. It includes open space and rangelands, as well as prime ag lands in current production which are among the highest preservation goals of both the Ukiah General Plan and the Mendocino County General Plan. It is therefore in conflict with both General Plans and the planning principles and regulations of LAFCo. It is hoped that the city will work to comply with the intent of state laws for SOI's, and imagine the ability to implement real services to the community.

Every other City and Community Service District in Mendocino County has an approved SOI. If I were an elected City Council, a City Manager or City Planner, I would want to know why the City of Ukiah has not complied with regulations for the legal adoption of the City's Sphere of Influence by LAFCO since 1984.

Alan Nicholson  
February 28, 2022

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