



TUOLUMNE UTILITIES DISTRICT

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May 1, 2026

City of Sonora Community Development Department
Attn: Tyler Summerset
94 N. Washington Street
Sonora, CA 95370

RE: SAFETY ELEMENT UPDATE

To Whom It May Concern:

This letter responds to your April 16, 2026 letter to advisory agencies regarding updates to the City of Sonora Safety Element. The Proposed Safety Element states:

Policy 1.4: Maintain an adequate peak load water supply for fire suppression efforts in Sonora.

Program/Implementation 1.4A: The City shall require each new large-scale development to submit a water usage plan showing that Sonora's water system can supply the new development with minimum water amounts while maintaining optimal water supply for fire suppression work.

Program/Implementation 1.4B: The City shall conduct a water supply and infrastructure assessment to determine the adequacy of existing water supply infrastructure. The assessment shall include a mapping effort to identify the geographic location of anticipated water supplies. System improvements shall be conducted by Tuolumne Utilities District, in coordination with the City, if any part of the water supply system is found insufficient to meet peak load water supply requirements for fire suppression efforts. The City, in coordination with Tuolumne Utilities District, shall be responsible for maintaining the consistent and long-term integrity of water supplies. The City shall work with Tuolumne Utilities District to set a schedule for reassessing the water supplies and associated infrastructure.

Program/Implementation 1.4A appears to apply to discretionary projects (Conditioned and approved by the City Council). For discretionary projects, the Tuolumne Utilities District (District) receives and responds to the City's advisory agency letters with information regarding existing District water supply, treatment, storage, and distribution (pipeline) capacity. In each response, the District includes a disclaimer that additional information from the fire authority is needed before the District can accurately determine whether its facilities have adequate capacity to meet a project's water demands. The District understands that the local fire agency will also respond to the City's advisory agency letter with fire-related conditions for service, including required fire-flow rate and duration. If the project is approved by the City Council, the developer then provides the approved fire conditions to the District, and the District analyzes its system to determine whether improvements are required to serve the project. If improvements are required, the developer funds and/or constructs the improvements and the District notifies the City when the improvements are complete. These are District requirements for all projects requiring service from the District, whether large or small and whether ministerial or discretionary.

The District offers the following language for Program/Implementation 1.4A to align with the City's and the District's development review processes:

Program/Implementation 1.4A: For large or small projects, whether ministerial or discretionary, the developer shall be required to construct and/or fund any public water system improvements necessary to meet the project's required domestic water or fire-flow demands. Fire related conditions, including fire-flow rate and duration, are determined by the City of Sonora Fire Department. These conditions are then provided by the developer to the District. With this information the District will evaluate the water system's ability to meet the conditioned fire-flow and inform the developer of the public water system improvements (if any) needed to satisfy the City's fire-flow conditions. The City's final approval for a project shall be dependent on the developer satisfying all conditions for the project including conditions for water and fire service.

Program/Implementation 1.4B appears to obligate the City to conduct water supply and infrastructure assessments for future development. Is this the City's intent? TUD is the owner and operator of the public water system serving the City and it is TUD's exclusive responsibility to operate and maintain the system. As part of that responsibility, the District ensures that new connections to the public water system do not adversely affect the system's ability to provide domestic water service and fire-flow. TUD has developed a hydraulic model of the water distribution system to evaluate various development scenarios and predict where water system improvements are necessary to serve new development. Per the District's Water Rules and Regulations, if a new development will adversely affect the District's water system, the developer is responsible for mitigating the impacts through off-site improvements. It is not reasonable to expect the City to evaluate the water system or to be responsible for "maintaining the consistent and long-term integrity of water supplies" Please note that the District is not legally obligated to upgrade the entire water system to comply with current standards. Capital improvements to the water system in the City of Sonora are weighed against many other competing priorities and are scheduled based on the District's available finances and staff resources. Improvements needed to serve new development are funded entirely by the project proponent.

One way the City can expedite water system improvements is to secure funding through programs like HUD's Community Development Block Grants (CDBG). As an example, in 2016, the City secured CDBG to replace approximately 2,500 linear feet of District water mains and approximately 90 fire hydrants. In addition, the District assists the City of Sonora Fire Department with hydrant flow tests, which are commonly conducted to verify available fire-flow for a proposed project. The District recommends that the City Fire Department coordinate with the District to perform hydrant flow tests during the District's annual hydrant flushing program at the beginning of each calendar year; hydrant locations and capacity could then be geo-referenced on City mapping. This updated information would be valuable to the City and District when assessing the fire-flow capacity of the District's existing water distribution system and evaluating the accuracy of the District's hydraulic model

The District offers the following language for Program/Implementation 1.4B to align with the City's and District's ongoing collaboration:

Program/Implementation 1.4B: The City shall coordinate with the Tuolumne Utilities District (District) and the City's Fire Department to conduct hydrant flow tests at strategic locations throughout the water distribution system.. The data from that effort will be used to calibrate the District's hydraulic model which can be used as a tool to identify other areas of the system that do not comply with current fire flow standards. If any part of the water supply system is found insufficient to meet peak load water supply requirements for fire suppression efforts the City shall work with the District to identify the improvements needed and to seek grant funding for the improvements. System improvements shall be conducted under the supervision of the District and in coordination with the City. The City shall work with the District to set a schedule for reassessing the water supplies and associated infrastructure.

Lastly, Tuolumne Utilities District's Sonora Water Treatment Plant was excluded from the Safety Element. This facility is located at 520 Bald Mountain Road and has a maximum treatment capacity of 4.0 MGD (2,800 gpm), along with

1,000,000 gallons of storage capacity. In addition, the District's 3,000,000-gallon Greenley Tank, located at 19757 Greenley Road, provides water storage capacity in the southern portion of the City.

Please feel free to contact me at any time with questions regarding this letter or for additional information about the District's water facilities serving the City of Sonora.

Regards,

A handwritten signature in blue ink, appearing to read 'Antonio J. Ramirez', with a stylized flourish at the end.

Antonio J. Ramirez
Engineering Services Technician
(209) 532-5536 Ext. 511