

DRAFT

Prepared for:

City of Sonora
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Sonora, California 95370
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2024-2029 Housing Element Update and Safety Element Update

Initial Study/Negative Declaration

Prepared by:



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB 52	Assembly Bill 52
BMP	Best Management Practices
HCD	California Department of Housing and Community Development
HEU	Housing Element Update
IS	Initial Study
LHMP	Local Hazard Mitigation Plan
MS4 Permit	Municipal Separate Storm Sewer System Permit
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas and Electric Company
RHNA	Regional Housing Needs Allocation
RHNP	Regional Housing Needs Plan
SB 18	Senate Bill 18
SEU	Safety Element Update
SFD	Sonora Fire Department
SR 49	State Highway/Route 49
SR 108	State Highway/Route 108
SWPPP	Stormwater Pollution Prevention Plan
TUD	Tuolumne Utilities District
UWMP	2020 TUD Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone

1 Introduction and Purpose

1.1 Project Overview

The City of Sonora (Lead Agency) is proposing updates to both the Housing Element and Safety Element of the City's General Plan ("project"), to align with recently enacted State laws. The City previously updated the Safety Element in 2020 as part of its comprehensive General Plan Update 2020. The Housing Element was previously updated in 2019. The proposed project includes the Seventh Cycle, 2024-2029 Housing Element Update of the General Plan and an update to the City's Safety Element to address various hazards the City has faced, including wildfires, floods, and severe weather. The Housing Element and Safety Element Updates are policy updates only, and no specific development is proposed at this time.

1.2 Statutory Authority Requirements

In accordance with the California Environmental Quality Act of 1970, as amended (California Public Resources Code, Section 21000-21177) and pursuant to the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], Chapter 3, Section 15063), the City, acting in the capacity of the Lead Agency, is required to undertake the preparation of an Initial Study (IS) to determine if the project would have significant environmental impacts. The environmental document is intended as informational, undertaken to provide an environmental basis for subsequent discretionary actions on the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approval would be required.

The environmental documentation and supporting analysis will be subject to a public review period. During this review, public comments on the documentation should be addressed to the City. Following the review of any comments received pertaining to the CEQA review, the City will consider these comments as part of the project's environmental review and determination. The comments will be included in the IS document for consideration by the City of Sonora's Planning Commission and City Council.

1.3 Purpose of the Initial Study

The purpose of the IS is to: (1) identify environmental impacts; (2) provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), Mitigated Negative Declaration (MND) or Negative Declaration (ND); (3) enable a Lead Agency or Applicant to modify a project, mitigating potential adverse impacts before an EIR is prepared; (4) facilitate an environmental assessment early in the design of a project; (5) provide documentation of the factual basis for the finding in an MND or ND that a project would not have a significant environmental effect; (6) eliminate needless EIRs; (7) determine whether a previously prepared EIR could be used for a project; and (8) assist in the preparation of an EIR, if required, by focusing the EIR on the effects determined to be significant, identifying the effects determined not to be significant, and explaining the reasons for determining that potentially significant effects would not be significant.

Section 15063 of the State CEQA Guidelines identifies specific disclosure requirements for inclusion in an IS. Pursuant to those requirements, an IS must include the following: (1) a description of the project, including the location of the project; (2) an identification of the environmental setting; (3) an identification of environmental effects by use of a checklist; (4) a discussion of ways to mitigate significant effects identified, if any; (5) an examination of a project's compatibility with existing zoning, plans, and other applicable land use controls; and (6) the name of the person or persons who prepared or participated in the preparation of the IS.

1.4 California Environmental Quality Act Compliance

In accordance with CEQA and the State CEQA Guidelines, this IS has been prepared for the proposed project and its associated discretionary approvals. The IS indicates that the project would not have any significant or potentially significant environmental impacts, and therefore, the project requires preparation of an Initial Study/Negative Declaration (IS/ND).

The IS/ND serves as the environmental document that presents the analysis of project impacts on each of the environmental topic areas in the CEQA Environmental Checklist provided in Section 3.0. This document will serve to inform City decision makers, representatives of affected trustee and responsible agencies, and other interested parties of the potential environmental effects that may occur with approval and implementation of the proposed project.

1.5 California Environmental Quality Act Review and Comment

This IS/ND has been submitted to potentially affected agencies and individuals. Notices of the availability of the IS/ND for review and comment, as well as the environmental documentation, are available on the City of Sonora's website (<https://sonoraca.com/category/city-of-sonora-public-notice/>) for review.

A 30-day public review period has been established for the IS/ND in accordance with Section 15073 of the State CEQA Guidelines. During review of the IS/ND, affected public agencies and the interested public should focus on the document's adequacy in identifying and analyzing the potential environmental impacts. Comments on the IS/ND and the analysis contained herein must be received by 5:00 PM on August 12, 2025, and should be addressed to:

City of Sonora
Tyler Summersett
Community Development Director
94 North Washington Street
Sonora, CA 95370
tsummersett@sonoraca.org
1.209.532.3508

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation – such as an EIR or an IS/MND – may be required. If not, the project and the environmental documentation are tentatively scheduled to be submitted to the Sonora Planning Commission and City Council for consideration.

1.6 Organization of the Initial Study

The IS/ND is organized into sections, as described below:

- **Section 1.0: Introduction and Purpose.** This section provides an introduction, project summary, and overview of the conclusions in the IS/ND.
- **Section 2.0: Project Description.** This section provides a brief description of the project location and relevant background information. This section provides a description of the proposed project and necessary discretionary approvals.
- **Section 3.0: Environmental Checklist.** The completed Environmental Checklist Form from the State CEQA Guidelines provides an overview of the potential impacts that may or may not result from project implementation. The Environmental Checklist Form also includes “mandatory findings of significance”, as required by CEQA. The analysis concludes the significance of impacts and standard conditions, regulatory requirements, and mitigation measures to reduce potentially significant impacts.
- **Section 4.0: References.** This section identifies the references used to prepare the IS/ND and lists the preparers of the document.

2 Project Description

1. Project Title:

City of Sonora 2024-2029 Housing Element Update and Safety Element Update

2. Lead Agency name and address:

City of Sonora
Community Development Department, Planning Division
94 North Washington Street
Sonora, CA 95370

3. Contact person and phone number:

Tyler Summersett, Community Development Director
tsummersett@sonoraca.org
1.209.532.3508

4. Project location:

Citywide; Sonora is located in Tuolumne County, in the Sierra Nevada foothills.

5. Project sponsor's name and address:

City of Sonora
94 North Washington Street
Sonora, CA 95370

6. General Plan Designation:

Citywide. Under the existing General Plan, the project area consists of a range of land use designations including Commercial, Estate Residential, Heavy Commercial, High Density Residential, Historic Mixed Density Residential, Historic Mixed Use, Light Manufacturing, Medium Density Residential, Mixed Use, Public/Quasi Public, Park/Recreation/Resource/Open Space, and Single Family Residential.

7. Zoning:

Citywide. The project area consists of a range of zoning designations, including Residential Estates, Single Family Residential, Limited Multi-Family Residential, Multi-Family Residential, PD Limited Multi-Family Residential Combining, PD Multi-Family Residential Combining, Tourist and Administrative, Commercial, General Commercial, Limited Manufacturing, Agricultural/Residential, Planned Development Combining Zone, PD Commercial Combining, and Open Space. In order to receive certification of the City's 2024-2029 Housing Element by the California Department of Housing and Community Development (HCD), the 5th and 6th Regional Housing Needs Assessment (RHNA) candidate site(s) are to be rezoned to accommodate by-right housing pursuant to Government Code Section 65583.2 (c). Specifically, Program 3.1 requires the City to amend the City's Municipal Code by adding Chapter 17.21, entitled Regional Housing Needs Assessment Overlay Zone District (RHNAOZD), to Title 17 of the City of Sonora Municipal Code. The RHNAOZD applies to the Lemke property (APN: 044-430-055), which is zoned R3 (maximum density of 21.75 du/acre). As an overlay zone, the RHNAOZD would layer on top of the base R3 zoning regulations, leaving in place the option to develop under the base zoning, but providing the opportunity to develop the property through a ministerial by-right approval process should an applicant propose 20 percent low-income deed restricted affordable housing.

- 8. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Consultation with California Native American tribes is addressed in Section 3.18, Tribal Cultural Resources.

2.1 Project Location and Setting

The City of Sonora is in the western portion of Tuolumne County, California, covering approximately 3.18 square miles within the Sierra Nevada foothills. The City boundary extends to the Town of Browns Flat to the north and State Highway 108 (SR 108) to the south. The City is surrounded by unincorporated Tuolumne County. The communities of Columbia and Springfield are located to the north, East Sonora to the east, and Jamestown to the west; refer to Exhibit 1, Regional Location. The nearest highways to the City are SR 108, at the southern boundary of the City, and SR 49, which runs from the western portion of the City, through the City's historical center, and is the primary access through the Downtown area; refer to Exhibit 2, Local Vicinity.

2.2 Project Background

The City is updating the General Plan Housing and Safety Elements in order to align them with other General Plan Elements, as required by State law, including the Land Use, Circulation, Conservation and Open Space, Noise, Public Facilities and Services, Air Quality, Cultural Resources, Economics, Community Identify, and Parks and Recreation Elements. Both updates strive to align with recently enacted State laws and meet State requirements. The Safety Element Update is intended to adopt new climate change and wildfire mitigation strategies that will help the City better prepare for possible new and more severe climate scenarios.

Housing Element Update

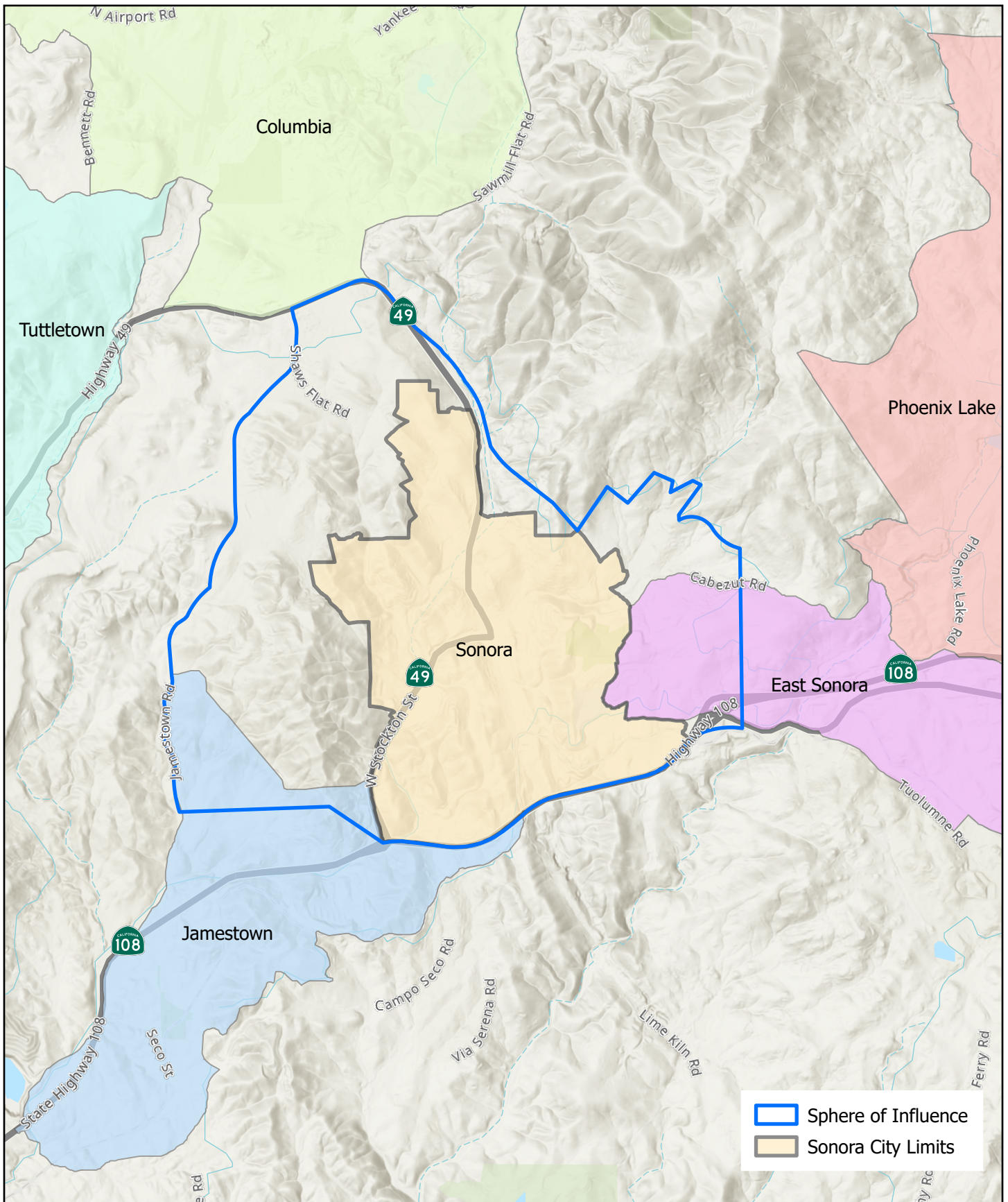
The 2020 Census indicates a citywide population of 5,003, which is estimated to have decreased to 4,940 people in 2021. The City is the only incorporated area in Tuolumne County, and therefore the largest city in the area. The City is proposing to adopt the Housing Element for the Seventh Cycle planning period from 2024 to 2029. The proposed Housing Element Update (HEU) is available on the City's website through this link: [Sonora Community Development Department](#). The Housing Element, which is part of the City's General Plan, is a policy document designed to provide the City with a coordinated and comprehensive strategy for promoting the production of safe and affordable housing within the community. California Government Code Section 65580 states the following regarding the importance of creating housing elements:

The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

Per State law, the housing element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
2. To provide a strategy that establishes housing goals, policies, and programs.

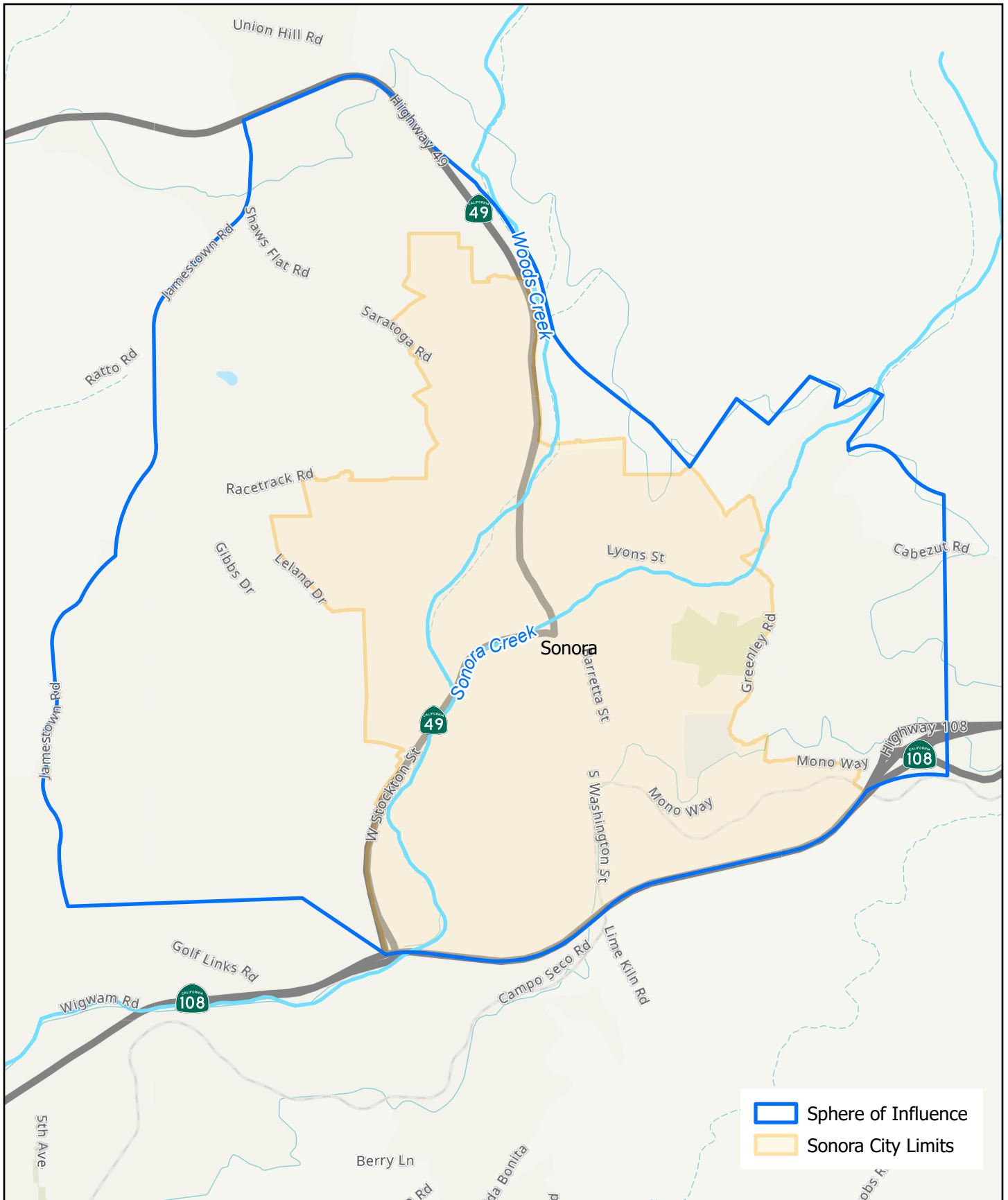
The proposed Housing Element Update describes and analyzes the housing needs of Sonora residents and the issues confronted by the City, and provides goals, policies, and quantified objectives related to the maintenance, preservation, improvement, and development of housing.



Sources: City of Sonora, Tuolumne County
Map Export: 7/1/2024 3:03 PM.



EXHIBIT 1 Regional Location



Sources: City of Sonora, Tuolumne County
Map Export: 7/1/2024 2:59 PM.



EXHIBIT 2 Local Vicinity

Safety Element Update

The Safety Element Update (SEU), provided on the City’s website through this link: [Sonora Community Development Department](#), analyzes potential natural and human-caused hazards to safety in the City and provides goals, policies, and actions to minimize these hazards. The SEU evaluates hazards that may affect existing and future development and growth and provides guidelines for protecting the community and minimizing harm to the extent feasible. The goal of the SEU is to reduce the risk of injury, death, property loss, and other hardships to acceptable levels. Periodic updates of the Safety Element ensure that goals and policies remain relevant and responsive to community needs, hazard situations, and State law. California Government Code Section 65302(g)(1) identifies the following list of safety risks that, at a minimum, must be examined in each Safety Element:

- Seismically induced surface rupture*
- Ground shaking*
- Ground failure*
- Flooding*
- Tsunami
- Seiche
- Dam failure
- Slope instability leading to mudslides and landslides*
- Subsidence*
- Liquefaction areas
- Other seismic hazards
- Wildland and urban fires*
- Climate change*

Items denoted by an * are potential hazards relevant to the City of Sonora.

2.3 Project Characteristics

Housing Element Update

Background

The City’s Housing Element serves as an integrated part of the General Plan and is subject to detailed statutory requirements, including a requirement to be updated every five years and mandatory review by the California Department of Housing and Community Development (HCD). This action includes the adoption of the HEU, which is a policy document; no actual development of parcels is included as part of the HEU. The proposed HEU is a five-year plan for the 2024-2029 period.

Pursuant to Government Code Section 65583, a housing element is required to consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Specifically, a housing element is required to contain the following:

- An assessment of housing needs and an inventory of resources and constraints relevant to meeting those needs (Government Code Section 65583[a])
- A statement of the community’s goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code Section 65583[a])

- A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and to achieve the goals and objectives of the housing element (Government Code Section 65583[c])

According to the Regional Housing Needs Plan (RHNP), the City of Sonora has a Regional Housing Needs Allocation (RHNA) of two (2) new units for the 2024-2029 period. Of the two units needed, one new unit is needed for very low income and one for low income. This is half of the need of Tuolumne County, in which two units are needed for very low income and two for low income. Combined, the City and Tuolumne County need six new units. The Housing Element Update identified two adequate sites with appropriate densities to meet the current RHNA requirements. The City has sufficient vacant property that, once developed, would result in units across all income categories beyond the cycle's requirement. The Seventh Cycle Housing Element was adopted in summer 2025. The Seventh Cycle Housing Element was submitted to HCD and found to be in compliance in summer 2025, contingent upon timely implementation of stated programs.

Housing Element Overview

The City's HEU consists of the following major components:

- A review of the prior housing element and goals that were accomplished (Appendix B, Housing Accomplishments – Evaluation of the 2019 Housing Element)
- An assessment of housing needs in the City including profile and analysis of the City's demographics, housing characteristics, and existing and future housing needs (Section 3.2, Needs Assessment)
- An assessment of resources available to meet the City's objectives regarding housing production and preservation. Resources include land available for new construction and redevelopment, as well as financial and administrative resources available (Section 3.3, Site Inventory Analysis and Zoning)
- A review of the constraints to housing production and preservation. Constraints include potential market, governmental policy, and environmental limitations to meeting the City's identified housing needs (Section 3.4, Constraints)
- A statement of the housing plan to address the City's identified housing needs, including housing goals, policies, and programs (Section 3.6, Housing Plan)

Regional Housing Needs Allocation (RHNA)

State housing element law requires housing elements to be updated regularly to reflect a community's changing housing needs, including preparation of a RHNA plan (Government Code Section 65584[a]). A critical measure of compliance is the ability of a jurisdiction to accommodate its share of the regional housing needs based on a RHNA prepared by HCD for each Council of Governments or regional jurisdiction in the State that identifies projected housing units needed for all economic segments based on the Department of Finance population estimates. HCD is responsible for allocating this total to the jurisdictions within Tuolumne County (the City of Sonora and Tuolumne County). This process is known as the RHNA and occurs every 8.5 years.

The RHNP creates the RHNA by allocating to each city and county a "fair share" of the region's projected housing needs by household income group. In each jurisdiction, the RHNA is distributed among four different income groups. This ensures that each city or county is planning for housing that meets the needs of all economic segments of the community, including lower income households.

For the City of Sonora, the RHNA for 2024-2029 is 2 units. This includes one very low-income unit, and one low-income unit. The 2024-2029 Housing Element demonstrates that the City has the capacity to accommodate this projected housing need.

Summary of Ability to Meet RHNA

As shown in Table 2-1 below, the identified vacant sites can accommodate the RHNA allocation in all income categories. The table illustrates a surplus capacity of 52 very low-income sites, 52 low-income sites, 24 moderate income sites, and 24 above moderate-income sites based on the allowed density of the identified sites.

Table 2-1
Summary of Ability to Meet RHNA

Table 3-26: Capacity to Meet RHNA Requirement					
	Very Low	Low	Moderate	Above Moderate	Total
RHNA Requirement	1	1	0	0	2
RHNA Sites					
Lemke	53	53	0	0	106
Cuesta Heights	0	0	24	24	48
Total Capacity	53	53	24	24	154
<i>Surplus</i>	52	52	24	24	152

Rezone

As noted in Housing Element Program 3.1 and consistent with the California Department of Housing and Community Development's (HCD) correspondence dated June 9, 2025, the 5th and 6th Regional Housing Needs Assessment (RHNA) candidate site(s) are to be rezoned to accommodate by-right housing pursuant to Government Code Section 65583.2 (c). Specifically, Program 3.1 requires the City to amend the City's Municipal Code by adding Chapter 17.21, entitled Regional Housing Needs Assessment Overlay Zone District (RHNAOZD), to Title 17 of the City of Sonoma Municipal Code. The Regional Housing Needs Assessment Overlay Zone District (RHNAOZD) applies to the following property:

Table 2-2
RHNAOZD Site

Regional Housing Needs Assessment Overlay Zone District Sites						
Site Name	APN	Existing Zoning/General Plan Designation	Approx. Acreage	Maximum Density	Unit Potential	Affordability
Lemke	044-430-055	R3/HDR	11.05*	21.75 du/acre	106	Low/Very Low

* Based on the site constraints and the topography of the area, the portion of this parcel that falls within the range of 0-15% slope would be developable at 9.19 acres.

The Lemke site is the sole remaining 5th and 6th RHNA site at 9.19 acres of vacant land of an 11.05-acre parcel in the R3 Zone. The R3 Zone has a maximum density of 21.75 dwelling units per acre, making the R3 zone suitable for lower-income housing. However, based upon site constraints, including topography, the realistic capacity of the site is 106 lower income units. The projection is based on taking the developable portion of the site (9.19 acres) at the average density of multi-family developments in the City (11.6) acres.

As an overlay zone, the RHNAOZD would layer on top of the base R3 zoning regulations, leaving in place the option to develop under the base zoning, but providing the opportunity to develop the property through a ministerial by-right approval process should an applicant propose 20 percent low-income deed restricted affordable housing. The by-right approval process is subject to objective design standards. Accordingly, the Lemke property will be rezoned to have a zoning designation of R3/(RHNAOZ), as required for HCD Certification of the City's 2024-2029 Housing Element of the General Plan.

The purpose of the RHNAOZD is to acknowledge existing statutes, thereby memorializing an existing by-right approval process and application of objective design standards afforded to developers of projects that include 20 percent of the units as housing affordable to lower income households in accordance with Government Code Section 65583.2. Other than the by-right approval and objective design standards processes established by the RHNAOZ, no land use changes are proposed with the rezone of the Lemke property.

2024-2029 HEU Goals and Policies

Based on the City's ability to meet the RHNA allocation as described above, the HEU is a policy document; no actual development of parcels is included as part of the approval. The project evaluated herein therefore does not include development. The Housing Element goals, policies, objectives, and programs, which can be found in Chapter 3.6, Housing Plan, reflect the City's continued commitment to actively support residential development and plan for the City's fair share of regional housing needs.

Safety Element Update

Background

Throughout the history of the City of Sonora, the City has dealt with various natural and human-caused hazards, including earthquakes, wildfires, droughts, land movement, train derailments, flooding, and a pandemic. Landslides and mudslides have occurred as a result of severe weather and flooding, and most of the City has been identified as being within a Very High Fire Hazard Severity Zone (VHFHSZ). The City's Safety Element is updated periodically to ensure the City continues to address the relevant natural and human-caused hazards of the time. In the twenty-first century, climate change has become a prevalent safety concern for all jurisdictions, as it increasingly affects other hazards such as severe weather, flooding, wildfires, diseases, extreme heat, and drought. Safety Element updates are now required to evaluate local hazard events and the likelihood of future hazards in the context of climate change.

Safety Element Overview

The City's SEU addresses hazards of concern relevant to the City and provides goals, policies, and implementation measures to adapt to and minimize these hazards. The 2024 Sonora SEU was developed in conjunction with the development of the 2024 City of Sonora Local Hazard Mitigation Plan (LHMP). The LHMP identifies specific needs, goals, mitigation actions, capital improvement projects, and local and regional partnerships relevant to the City of Sonora, for the purpose of protecting the community from natural and human-caused hazards. Further details regarding natural disasters, including relevant mitigation actions to reduce vulnerability, are included in the LHMP. The LHMP incorporates a process where hazards are identified and profiled, the people and facilities at risk are analyzed, and mitigation actions are developed to reduce or eliminate hazard risk. The implementation of these mitigation actions, which include both short-term and long-term strategies, involve planning, policy changes, programs, projects, and other activities. The hazards identified in the SEU and many of the goals, policies, and implementation measures included in the SEU coincide with the hazards, goals, and actions included in the LHMP.

Natural and human-caused hazards determined relevant to the City of Sonora in the SEU include the following:

Wildfire and Urban Fire Hazards

Most of the City is designated a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection. The City FHSZ is classified as a Local Responsibility Area and falls under the jurisdiction of the City of Sonora Fire Department. The terrain in the City consists of heavily wooded communities and steep terrain that limits and challenges vegetation management and fire suppression activities. Most of the VHFHSZ in the City is located in residential areas, in which many lots are surrounded by substantial vegetation and dense brush that, when combined with increasingly frequent drought conditions, presents a significant fire hazard as vegetative fuel. Additionally, the City is surrounded by unincorporated areas of Tuolumne County, which include fire hazard zones in State Responsibility areas. The majority of these unincorporated areas are VHFHSZs, indicating a significant risk of wildfire in the surrounding areas of Tuolumne County that could spread rapidly and threaten the City. The City of Sonora also has many historical buildings that were not built in compliance with modern fire codes and are at an increased risk of structural fire.

The threat of wildfire in Sonora has been increasing in recent decades and is expected to continue to worsen due to the effects of climate change. The foothill area in which Sonora is located offers a substantial fuel load for fires and experiences long, dry summers that further increase fire risk. More severe drought conditions, severe weather, and extreme heat are expected throughout the remainder of the century. The annual fire season is expected to become longer and more severe on average.

Seismic Hazards

The City of Sonora is located in an area of concern for seismic activity. The City is located on a pre-quaternary fault which is generally considered inactive, however, known active faults and potentially active faults are located west of the City in the Foothills Fault Zone. The nearest mapped fault of the Melones Fault Zone, which is part of the Foothills Fault Zone, is located approximately 3.5 miles southwest of the City. There are also four “capable” faults, faults with tectonic displacement within the last 35,000 years which could produce an earthquake, located within Tuolumne County. The City is therefore susceptible to seismic ground shaking as a result of seismic activity in the region. Major faults in the Bay Area could also trigger large earthquakes that could generate ground shaking in Sonora.

Downtown Sonora has many historic buildings that predate modern seismic codes and would be at risk in the event of seismic ground shaking. The City is also underlain by various tunnels and mines constructed prior to modern seismic codes that could collapse during ground shaking, causing ground failure and subsidence. The earthquake potential for the City is considered occasional. The City has a low potential for liquefaction.

Geologic Hazards

The City of Sonora consists of sloped terrain that may be subject to landslides and erosion. Steep slopes in the west, north, and east residential areas of the City are at risk of landslides that may occur as a result of earthquakes, heavy rain, floods, or wildfires. Mudslides may also occur in the City in areas where wildfires have removed vegetation from the soil, leaving the soil exposed and susceptible to movement in the event of heavy rain. The City is at risk of subsidence in the form of sinkholes occurring over historic mines. Heavy rains saturate the soil and pose a risk to structures located above the tunnels and mines. Additionally, the City is at risk of a variety of hazards associated with volcanoes, which are located in Mono County, east of the City. A volcanic eruption from the Long Valley Volcanic Region would have to be very large to directly reach the City of Sonora, however, volcanic ash and volcanic gas may impact the City depending on the size, location, and type of eruption and wind direction. Volcanic ash can pose a threat to buildings, roads, utilities, and communications, and can also cause respiratory effects such as asthma.

Flooding

The City is at risk of flooding caused by an overflow of Woods Creek, which is located within the Federal Emergency Management Agency 100-year flood zone. The areas adjacent to Woods Creek and Sonora Creek are

at risk of flooding in the event of extreme precipitation. Localized surface flooding poses a threat to City and emergency operations and historic structures in the Downtown area. The City's primary stormwater conveyance system, the Main Drain, located under Downtown Sonora, is outdated and in need of improvements. The LHMP includes improvements to the Main Drain. The City is not at risk of dam inundation.

Hazardous Materials/Wastes

Hazardous materials are generated, used, and stored by facilities throughout the City of Sonora and in surrounding unincorporated communities for a variety of purposes in service industries, agriculture, businesses, schools, and households. The City does not contain the types of major industrial uses that typically result in larger amounts of hazardous materials, nor are significant areas of heavy industry located in adjoining areas of unincorporated Tuolumne County. According to the Department of Toxic Substances Control EnviroStor database, three sites in the City are classified as "Evaluation Needed". There is one active State response clean-up site at Sierra Launderers & Cleaners, located at 407 North Washington Street. All four of the above sites are assumed to pose a limited risk of hazardous materials release to the community.

Emergency Operations

The City of Sonora does not have a centralized communication system and lacks reliable internet service during emergency scenarios. The City also does not currently have proper emergency response equipment. Without proper emergency response equipment and communications technology, the City may be unable to provide adequate emergency response services. Hazard events are expected to increase in frequency and severity as a result of climate change; the City needs the necessary resources to be prepared for future hazards. Additionally, the City of Sonora is at risk of pandemics, the most recent of which occurred in 2019 and caused hundreds of deaths in Tuolumne County and much of the City to shut down.

Human-Caused Hazards

Human-caused hazards in Sonora can include a variety of incidents, including active shooter events, terrorist attacks, aircraft crashes, civil disturbance, and cyberterrorism. These hazard types are often difficult to predict and impacts can vary greatly depending on the specific incident. The City of Sonora is at an increased risk of active shooter events, terrorist attacks, cyberterrorism, and civil disturbance because of the presence of multiple City/County governmental buildings, schools, churches, and other critical assets in the City.

Climate Change

The City of Sonora is expected to see the following changes as a result of climate change in coming years and decades: periods of very high and very low precipitation resulting in both droughts and severe flooding, severe weather events that may also cause flooding, an increase in extreme heat days per year and higher average annual temperatures, and more frequent and severe wildfires in the region.

Critical Facilities and Infrastructure

The City's principal stormwater conveyance system, the Main Drain, includes stone tunnels dating back to the late 1880s. Portions of the Main Drain remain vulnerable, insufficient, and in need of modern improvements. Structural deficiencies in the Main Drain increase the risk of future floods during severe weather events. Due to the location of the Main Drain, flooding as a result of the pipeline's deficiencies could threaten access to critical City facilities.

Evacuation

The City of Sonora has several subdivisions and roads that do not meet ingress/egress requirements for evacuation purposes or are currently designed in a manner which inhibits evacuation and emergency response efforts. The Downtown area has many one-way streets, and several roads have a tight turning radius that prohibits access for emergency vehicles. The City of Sonora is increasingly at risk of wildfires and other hazard events, and evacuation planning necessary to reduce evacuation-related vulnerabilities.

SEU Goals and Policies

Similar to the HEU, the SEU is a policy document; no actual development of parcels is included as part of the approval. In addition to the goals and policies, the SEU includes implementation measures for action items for the City. The goals, policies, and implementation measures for the SEU are included in each hazard type analysis.

2.4 Project Construction and Phasing

The proposed project includes two policy documents that do not include any actual development of parcels. Therefore, no construction would occur as a result of this project. Any development that might occur as a result of the goals, policies, and implementation measures contained within this project would be subject to further environmental review and approval on a project-specific basis. Any development that may occur pursuant to the RHNAOZD would not require additional environmental review; however, the RHNAOZD maintains the existing R3 zoning designation for the Lemke site, and no land use changes are proposed with the rezone of the Lemke property.

2.5 Project Approvals

The actions and/or approvals the City needs to consider for the proposed project include, but are not limited to, the following. This list is preliminary, and may not be comprehensive.

City of Sonora

- CEQA adoption of the Initial Study/Negative Declaration (IS/ND)
- Adoption of the City of Sonora 2024-2029 Housing Element Update
 - Pursuant to State law, the California Department of Housing and Community Development (HCD) is empowered to review the housing element of each community to ensure its compliance with the provisions of the Government Code related to facilitating the improvement and development of housing in order to make adequate provisions for the housing needs of all economic segments of the community. HCD has review but not approval authority.
- Adoption of the Regional Housing Needs Allocation Overlay Zone District
- Adoption of the City of Sonora Safety Element Update
 - Prior to adoption of the Safety Element, coordination and feedback from the Sonora Fire Department and Sonora Police Department is required.

3 Environmental Checklist

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology and Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
5. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized 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?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact: Scenic vistas in the City of Sonora include views available from State Route 49 and State Route 108. Scenic resources in the City include significant trees, hillsides, hilltops, scenic corridors, creeks, and historic resources. Woods Creek, Dragoon Gulch, Sonora Creek, public parks, and cultural facilities are all considered scenic resources in the City.¹ The HEU identifies two sites in the City with the capacity to meet the City's RHNA allocation, Lemke and Cuesta Heights. Neither site is located near or visible from SR 49 or SR 108. Potential future development on these sites is therefore not anticipated to be located within a scenic vista. Both sites have sloped terrain, are in hilly locations, and have a substantial number of trees. Potential future development would be required to comply with the City's design standards, Hillside Preservation Ordinance, and requirements of the Tree City USA program. No rivers or creeks are located on either site. Any potential development on either of these sites would be required to undergo separate and project-specific environmental review which would be completed prior to project implementation.

The SEU includes programs that require the following improvements: a French Drain at Sonora High School Dunlavy Stadium, improving the bridge at Southgate Drive over Sonora Creek, the Main Drain Improvement Project, and expanding the capacity of Woods Creek to avoid flooding in the area. Woods Creek and Sonora Creek are both considered scenic resources and are located adjacent to SR 49 in certain areas. The Main Drain is located under the Downtown area, in the middle of the City, as well as partially under SR 49. However, any reduction in visual character of these sites due to construction would be temporary in nature and once implemented, it is anticipated that none of these developments would substantially alter the existing visual character of the sites. Furthermore, any development related to the implementation of these improvements

¹ City of Sonora. 2020. *City of Sonora General Plan*. Website: <https://sonoraca.com/city-services/general-plan/>. Accessed June 11, 2024.

would be required to undergo separate and project-specific environmental review which would be completed prior to project implementation.

The HEU and SEU are both policy documents and do not include any changes to land use designations, building heights and intensities, or residential densities. Both Elements include policies intended to continue to make the City of Sonora a safe and desirable place to work and live. Potential aesthetic-related impacts are unique to a project's location and design and cannot be meaningfully determined until a project site has been defined. All future development would be subject to the City's zoning requirements. Therefore, the project would result in no impacts to scenic vistas. No mitigation measures are required.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact: The City's General Plan identifies the following as scenic resources: trees, hillsides, hilltops, corridors, creeks, historic and/or cultural facilities, public parks, Woods Creek, Sonora Creek, and Dragoon Gulch. The General Plan recognizes the following roadway sections as eligible for local designation as Scenic-Gateway Corridors: SR 49, South Washington Street to SR 108, SR 108, Hospital Road southbound to SR 108, and SR 108 to Sanguinetti Road. Views from SR 108 and SR 49 are considered scenic vistas. According to the California State Scenic Highway Program, SR 49, through the entire City, and SR 108 are eligible for State scenic highway designation. However, the City has not yet proceeded with maintaining official scenic highway designation for either SR 49 or SR 108 and has not established any officially designated Scenic-Gateway Corridor in the City.² Therefore, there are no designated State scenic highways in Sonora. The California Public Resources Code Sections 5070-5077.8 designates SR 49 as a heritage corridor, which is a regional, state, or nationwide alignment of historical, natural, or conservation education significance. The Sonora General Plan includes policies and programs intended to preserve the scenic resources of Sonora, including those located adjacent to SR 49 and SR 108.

As mentioned in Threshold a) above, any potential development at the sites identified in the HEU would not be located adjacent to or visible from SR 49 or SR 108 and would be subject to compliance with the City's Hillside Preservation Ordinance, the Tree City USA program, and the City's design standards. Additionally, potential future development related to the programs included in the SEU may include development near or of scenic resources, including Woods Creek. However, it is not anticipated that the infrastructure improvement projects suggested in the SEU would alter the existing visual character of any scenic resources. Any future development related to the HEU or SEU would be subject to project-specific environmental review prior to project implementation, and any potentially significant impacts would be addressed through mitigation measures specific to the project and impact.

The HEU and SEU are both policy documents and do not include any changes to land use designations, building heights and intensities, or residential densities. Both Elements include policies intended to continue to make the City of Sonora a safe and desirable place to work and live. Potential aesthetic-related impacts are unique to a project's location and design and cannot be meaningfully determined until a project site has been defined. All future development would be subject to the City's zoning requirements. Therefore, the project would result in no impacts to scenic resources or State scenic highways. No mitigation measures are required.

c) *In non-urbanized areas, would the project 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?*

No Impact: The project would implement policies intended to continue to make the City a safe and desirable place to work and live, including efforts such as development policies and critical infrastructure improvements.

² California Department of Transportation. 2018. *California State Scenic Highway Mapping System*. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacc>. Accessed June 11, 2024.

The City's current Zoning Code contains standards intended to preserve the natural beauty of the City, including provisions related to building standards (heights, setbacks, intensities), screening of utilities in development, outdoor improvements, hillside preservation, and tree preservation and management. The SEU includes suggested improvements to some of the City's scenic resources; however, implementation of these improvements would result in only temporary visual impairments, would not substantially alter existing scenic resources and visual character, and would be subject to project-specific environmental review prior to project implementation. The HEU identifies two sites within the City that would be suitable for potential future residential development. Both sites contain trees and are located on hilly terrain, however any potential future development on either site would be required to comply with the City's Hillside Preservation Ordinance and Tree City USA program. Future development in the City would be required to comply with the provisions of the City's Zoning Code. The proposed project includes two policy documents and does not include any changes to land use designations, building heights and intensities, or residential densities. No development is proposed. Therefore, the project would result in no impacts to the visual character or quality of public views or conflict with applicable zoning and other regulations governing scenic quality. No mitigation measures are required.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

No Impact: Sources of light present throughout the City predominantly include residential and commercial uses of both interior and exterior lighting and vehicular traffic, while sources of glare include highly finished building materials such as glass, and roadway traffic. The project consists of two policy documents and would not directly involve construction or development. However, all potential future residential development enabled by the City's General Plan is anticipated to introduce light and glare sources typical of development, and all future development in the City would be subject to the City's zoning requirements. The City's current Zoning Code contains lighting requirements intended to maintain public health, safety, and welfare from noxious or offensive illumination, glare, or similar effects. Capital improvement projects related to the programs included in the SEU are not anticipated to generate substantial sources of light or glare. All future development in the City would be required to comply with the provisions of the City's Zoning Code and would be subject to approval by the City's Design Review Commission. The proposed project would result in no impact related to light or glare which would adversely affect views. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to aesthetics; therefore, no mitigation measures are required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

- a) ***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***
- b) ***Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***
- c) ***Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?***
- d) ***Would the project result in the loss of forest land or conversion of forest land to non-forest use?***
- e) ***Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

No Impact: The City does not contain any Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, or timberland.³ No land within the City limits is under a Williamson Act contract.⁴ The project involves updates to the City's Housing Element and Safety Element, with no proposed changes to land use designations of parcels within the City. The City is primarily a residential and commercial community; some parcels in the southwest portion of the City and one parcel in the northern part of the City are zoned Agricultural/Residential, however there is no land within the City designated as forest land, timberland, or timberland zoned Timberland Production. No provisions contained in the HEU or the SEU would convert Prime Farmland, farmland of unique or Statewide importance, or an agricultural use. No development is proposed on forest land or timberland zoned Timberland Production. Any future development projects in the City would not conflict with an existing Williamson Act contract, would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and would not result in the conversion or loss of forest land. Any future development on properties zoned Agricultural/Residential would be subject to project-specific environmental review. Therefore, the proposed project would have no impact on agricultural or forestry resources. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to agriculture and forestry resources; therefore, no mitigation measures are required.

³ California Department of Conservation. 2022. *California Important Farmland Finder*. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed June 11, 2024.

⁴ California Department of Conservation. 2023. *California Williamson Act Enrollment Finder*. Website: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>. Accessed June 11, 2024.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

b) Would the project 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?

No Impact: The City is located in the Mountain Counties Air Basin, which is currently designated nonattainment for ozone and fine particulate matter less than 10 microns in diameter (PM₁₀). Tuolumne County is currently designated as nonattainment-transitional for ozone and is unclassified for PM₁₀.⁵ The Tuolumne County Air Pollution Control District is included in a portion of the California State Implementation Plan, which includes regulations for all pollutants and was adopted in 2022. The United States Environmental Protection Agency approved the Tuolumne County portion in 2023.⁶ There is no air quality management plan specific to Tuolumne County or the Mountain Counties Air Basin in its entirety.

The project would not directly result in construction or development activity, nor would it enable development beyond that which is currently provided for in the City's General Plan. The number of residential units that could be developed under the HEU is consistent with the City's current General Plan and zoning designations. Potential air quality-related impacts, including potential increases of criteria pollutants, are location-specific and cannot be assessed in a meaningful way until the location and design of a project is known. At such time that a development proposal is considered that project would be subject to adopted development air quality standards. Short-term air quality impacts resulting from construction activities, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers, would be subject to State air quality management regulations and all other relevant regional rules and regulations.

⁵ California Air Resources Board. 2022. *Maps of State and Federal Area Designations*. Website:

<https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed June 11, 2024.

⁶ United States Environmental Protection Agency. 2023. *EPA-Approved Tuolumne County Air Pollution Control District Regulations in the California SIP*. Website: <https://www.epa.gov/air-quality-implementation-plans/ca-sip-tuolumne-county-apcd>. Accessed June 11, 2024.

Thus, the project would result in no impacts related to the implementation of any applicable air quality plan, and it would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard. No mitigation measures are required.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

No Impact: The HEU and SEU are both policy documents that do not include any changes to land use designations. The proposed project does not directly involve construction or development activities. Potential air quality-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and project characteristics are known. The City's General Plan and Municipal Code contain policies and measures related to maintaining air quality in the City and reducing emissions from commercial uses. For potential future projects in residential areas, development buffers would be considered necessary to protect neighbors from air pollution-generating activities. At the time that a development proposal is considered for any future development in the City, that project would be subject to the development review process. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. No impacts would occur, and no mitigation measures are required.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

No Impact: Impacts would be considered potentially significant if the project were to result in the creation of objectionable odors with the potential to affect substantial numbers of people, or if construction or operation of the project would result in the creation or nuisance odors that would be noxious to a substantial number of people. Residential development such as that described in the HEU is not a land use typically associated with odor complaints or noxious emissions. The SEU suggests infrastructure improvement projects that are not anticipated to generate noxious emissions or odors. The SEU also contains policies intended to minimize health hazards related to air quality impacts from wildfires.

The proposed project would not directly involve construction or development activities upon implementation. The proposed project would therefore not result in impacts related to emissions adversely affecting a substantial number of people. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to air quality; therefore, no mitigation measures are required.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) 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?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) 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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

- a) *Would the project 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?***

No Impact: The City's environs have the capacity to house a range of plant and wildlife species, including State and federally listed species. The City's General Plan identifies approximately ten special status species that have the potential to occur within the City's Sphere of Influence. Potential impacts related to biological resources are unique to a project's location and cannot be meaningfully determined until a project

site has been defined. Any potential future development would be subject to federal, State, regional, and local regulatory requirements related to biological resources.

The SEU includes policies intended to lessen impacts to biological resources, including policies for climate adaptation and resiliency. Both the HEU and SEU are policy documents and do not directly include any development, construction, or land use changes. Potential future projects, including those related to the HEU and SEU, would be evaluated by the City for their compliance with goals, policies, and measures contained in the City's General Plan intended to mitigate potential impacts to natural and biological resources, including those contained in the Conservation and Open Space Element. Therefore, the proposed project would have no impact on candidate, sensitive, or special status species. No mitigation measures are required.

- b) *Would the project 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?***
- c) *Would the project 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?***

No Impact: The City contains several riparian areas, including the habitats around Woods Creek, Sonora Creek, and Dragoon Gulch. The City's General Plan also identifies several other vegetation types throughout the City's Sphere of Influence that have the potential to contain sensitive natural communities, including valley foothill riparian, wet meadow, lake or pond, perennial stream, intermittent stream, blue-oak foothill-pine, mixed chaparral, montane hardwood, blue oak woodland, and annual grassland. The General Plan also identifies the habitats along Woods Creek, Sonora Creek, and Dragoon Gulch as wetlands. According to the United States Fish and Wildlife Service National Wetlands Inventory, Sonora Creek is classified as riverine habitat throughout the middle of the City and as freshwater forested/shrub wetland along its eastern section, Woods Creek is classified as a freshwater forested/shrub wetland, and Dragoon Gulch is classified as riverine habitat. The National Wetlands Inventory also identifies riverine habitat and freshwater forested/shrub wetland in the southeastern portion of the City.⁷ Potential future development pursuant to the policies and programs of the SEU and HEU could have the potential to impact State or federally protected wetlands as well as riparian habitat or other sensitive natural communities.

However, the HEU and SEU are both policy documents and would not directly involve construction or development activity. Potential impacts related to sensitive natural communities, such as riparian or wetland habitats, are unique to a project's location and characteristics and cannot be meaningfully determined until a project has been defined. Therefore, the project would have no impacts on riparian habitat, other sensitive natural communities, or on State or federally protected wetlands. No mitigation measures are required.

- d) *Would the project 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?***

No Impact: The City is a heavily wooded community with numerous undeveloped hillsides and sloped terrain. A few creeks, identified by the City and US Fish and Wildlife Service as riparian habitat and wetlands, also pass through the City. Within these undeveloped areas, the potential exists for nesting birds and other species to occur, as well as for those areas to be wildlife nursery sites. However, the HEU and SEU are policy documents consistent with the City's General Plan and do not propose any land use changes. Further, future development in the City would be subject to all applicable State, regional, and local regulations and standards regarding biological resources. Therefore, the project would have no impact on the movement of native resident or migratory fish or wildlife species, corridors, or nursery sites. No mitigation measures are required.

⁷ United States Fish and Wildlife Service. *National Wetlands Inventory*. Website: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed June 14, 2024.

- e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***
- f) ***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

No Impact: The City has a Hillside Preservation Ordinance that governs residential development on hillsides and hilltops in the City in order to maintain visual quality, natural topography, resources, and amenities of the hillsides. The City also received official designation as a Tree City USA in 1995; the Tree City USA program provides standards for the City to manage its tree resources. Potential future development related to the HEU would occur in sloped, undeveloped areas of the City and may be subject to the development standards of the Hillside Preservation Ordinance and Tree City USA program. However, the HEU and SEU are policy documents consistent with the City's General Plan and do not propose any land use changes. Future development in the City would be subject to all applicable State, regional, and local regulations and standards regarding biological resources. Therefore, the proposed project would have no impact on policies protecting biological resources or any local, regional, or State habitat conservation plan. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to biological resources; therefore, no mitigation measures are required.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

- a) ***Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?***
- b) ***Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***
- c) ***Would the project disturb any human remains, including those interred outside of formal cemeteries?***

No Impact: The proposed project involves adoption of two policy documents, the HEU and SEU, which do not directly propose any ground disturbance or development that may impact historical resources. Potential impacts related to cultural resources are unique to a project's location and cannot be meaningfully determined until a project site has been defined. Potential future development in the City would require project-specific environmental evaluation in order to determine any potential impacts to cultural resources. Future development would be subject to federal, State, and local regulatory requirements related to the discovery and proper handling of cultural and historic resources, including Public Resources Code Section 211083.2, which requires avoidance and other measures in the event of discovery. Therefore, no impact to cultural resources would occur with implementation of the proposed project. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to cultural resources; therefore, no mitigation measures are required.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

- a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

No Impact: The HEU and SEU are consistent with the City's General Plan and contain policies to conserve energy resources. The HEU includes programs intended to conserve energy through public education on the reduction of residential energy use. However, the SEU and HEU are policy documents and do not directly involve any development. Potential impacts related to energy resources are unique to a specific project and cannot be meaningfully determined until a project has been defined. Any future development would be required to comply with federal, State, and local regulatory requirements related to energy efficiency. Future development projects would incorporate site-specific infrastructure improvements, as necessary, and would be reviewed by relevant energy providers to identify necessary energy facility and service connections. Additionally, future projects would be evaluated by the City for compliance with the goals, policies, and measures contained in the City's General Plan intended to reduce potential impacts to energy resources. Therefore, the proposed project would have no impact on energy resources as a result of wasteful, inefficient, or unnecessary energy consumption. No mitigation measures are required.

- b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

No Impact: The HEU and SEU are policy documents; the proposed project does not directly involve any development. Any future development in the City would be subject to federal, State, and local regulatory requirements related to energy efficiency. Any proposed buildings would be required to comply with the most recent version of the California Building Code, including the California Green Building Standards Code, which includes regulations for energy efficiency. Future projects would be evaluated by the City on a project-specific basis for compliance with goals, policies, and measures contained in the City's General Plan and Municipal Code intended to reduce potential impacts to energy resources. Therefore, the proposed project would have no impact on a State or local plan for renewable energy or energy efficiency. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to energy; therefore, no mitigation measures are required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) 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?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

- a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i) ***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.***
 - ii) ***Strong seismic ground shaking?***
 - iii) ***Seismic-related ground failure, including liquefaction?***
 - iv) ***Landslides?***

No Impact: Sonora is a region of California characterized by moderate seismic activity. According to the California Geological Survey, no active earthquake faults are known to exist within or around the City. The City is not within an Alquist-Priolo Fault Zone.⁸ The City is located on a pre-Quaternary fault, which is a fault that ruptured over 1.6 million years ago and is generally considered inactive. However, Sonora is at risk of seismic ground shaking occurring as a result of seismic activity from regional faults in and around Tuolumne County. Tuolumne County is located east of the Foothills Fault Zone, which includes the Melones Fault Zone along the east side of the system and the Bear Fault Zone on the west side. The closest known fault of the Melones Fault Zone is located approximately 3.5 miles southwest of the City of Sonora.⁹

The City is characterized by hilly, wooded terrain susceptible to landslide risks. Extreme flooding and erosion caused by wildfire burn scars have increased the risk of landslides and mudslides throughout the City in recent years. Liquefaction is considered unlikely as the City is not located within mapped liquefaction hazard zones. According to the City's General Plan, the potential for lateral spreading, lurching, or differential settlement to occur is low.¹⁰

The SEU addressed the protection of the existing and future population and development from both natural and human-caused hazards through a number of goals, policies, and implementation programs. Among these is Goal 2 of the SEU, which aims to "minimize risk of injuries, loss of life, property damage, and economic and social disruption resulting from seismic and geologic hazards in Sonora". Additionally, the proposed project includes two policy documents, and no development is proposed at this time. Any future development would be subject to federal, State, and local regulatory requirements related to building design and construction, including the most recent version of the California Building Code. Therefore, the proposed project would have no impacts related to the cause of potential substantial adverse effects involving earthquake faults, seismic ground shaking, or seismic-related ground failure. No mitigation measures are required.

- b) **Would the project result in substantial soil erosion or the loss of topsoil?**

No Impact: The proposed project consists of two policy documents and would not directly involve construction or development activities. Any future development in the City would be subject to State, regional, and local requirements related to the prevention of erosion of onsite soils and the discharge of construction-related pollutants. Future projects would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) and/or Best Management Practices (BMPs), as necessary. Future projects would also be evaluated by the City for their compliance with the goals, policies, and measures contained in the SEU intended to protect

⁸ California Geological Survey. *Earthquake Zones of Required Investigation*. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed June 13, 2024.

⁹ California Department of Conservation. 2015. Fault Activity Map of California. Website: <https://maps.conservation.ca.gov/cgs/fam/>. Accessed June 13, 2024.

¹⁰ City of Sonora. 2020. *General Plan Safety Element*. Website: <https://sonoraca.com/wp-content/uploads/2018/09/SonoraGeneralPlan2020-revision-2017-10-16-17-CC-adopted.pdf>. Accessed June 13, 2024.

lives and property. Therefore, the proposed project would have no impact on soil erosion or the loss of topsoil. No mitigation measures are required.

c) *Would the project 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?*

No Impact: The City of Sonora is characterized by wooded, sloped terrain that is susceptible to landslide risks. Areas with recent wildfire burn scars or where stormwater drainage systems are insufficient are particularly at risk of landslides and mudslides. Additionally, the City is underlain by various tunnels and historic mines constructed prior to modern seismic codes. These mines and tunnels are not mapped. Underground mines and tunnels could collapse during strong seismic ground shaking or as a result of severe storm events. As a result, sinkholes are a concern for the City. However, the potential for lateral spreading and liquefaction is low.

The HEU and SEU are policy documents; the proposed project does not propose physical changes in the environment and does not directly involve development. To account for any potential instability, all future development projects in the City would be subject to federal, State, and local regulatory requirements related to building design and construction. Pursuant to the CBC, project-specific geotechnical investigations would be required, subject to review by the City's Public Works Department, and any recommendations contained within would be required to be implemented. Additionally, all future development projects would be evaluated by the City for compliance with the goals and programs set forth in the SEU to decrease vulnerability to geologic hazards. Therefore, the proposed project would have no impacts related to unstable soil or geologic hazards, including landslides, lateral spreading, subsidence, or liquefaction. No mitigation measures are required.

d) *Would the project 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?*

No Impact: Expansive soils are characterized as fine-grained, such as silts and clays or soils with variable amounts of expansive clay materials that can change in volume due to changes in water content. According to the City's General Plan, soil types within the City consist predominantly of deep, well drained soils that present only a slight erosion hazard.¹¹ The risk of expansive soil in the City is considered low.

The HEU and SEU are policy documents and do not directly propose physical changes in the environment. The proposed project does not directly involve future development. Future development in the City would be subject to federal, State, and local regulatory requirements related to building design and construction. Pursuant to the CBC, project-specific geotechnical investigations would be required, subject to review by the City's Public Works Department, and any recommendations contained within would be required to be implemented. Therefore, the proposed project would have no impact on sites with expansive soil. No mitigation measures are required.

e) *Would the project 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?*

No Impact: Most of the City of Sonora is serviced by the Tuolumne Utilities District sewage collection system. However, some properties may require the use of a septic tank or alternative waste disposal system. Given the geologic and slope constraints in Sonora, the viability of a septic tank or alternative waste disposal system for a project would depend on the size of the project and the project's location. The HEU and SEU are policy documents consistent with the City's General Plan and do not propose any land use changes. The proposed project would not directly involve any development. All future development in the City would be subject to federal, State, and local regulatory requirements related to building design and construction. Pursuant to the CBC, project-specific geotechnical investigations would be required, subject to review by the City's Public

¹¹ City of Sonora. 2020. *General Plan Appendix 6b*. Website: <https://sonoraca.com/wp-content/uploads/2017/03/apdx-sonora-general-plan-2020.pdf>. Accessed June 13, 2024.

Works Department, and any recommendations contained within would be required to be implemented. Therefore, the proposed project would have no impact related to soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems. No mitigation measures are required.

f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

No Impact: The proposed project includes two policy documents and does not directly involve any development. Potential impacts related to paleontological and geologic resources are unique to a project and site and cannot be meaningfully determined until a project has been defined. In the event that paleontological resources are discovered during the implementation of future development projects, applicants will be required to comply with regulatory standards enumerated in Public Resources Code Section 5097.574, which identifies the protocol for proper handling. Therefore, the proposed project would have no impacts related to paleontological resources or unique geologic features. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to geology and soils; therefore, no mitigation measures are required.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

- a) ***Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***
- b) ***Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

No Impact: The HEU and SEU are policy documents consistent with the City's General Plan. The proposed project does not directly propose physical changes in the environment and does not directly propose future development. Impacts related to GHG emissions are unique to a project and cannot be meaningfully determined until a project has been defined. Any future development in the City would be required to comply with the most recent California Building Code, including the CALGreen code, which is intended to reduce GHG emissions through sustainable design and renewable energy considerations. Therefore, the proposed project would have no impacts related to the generation of GHG emissions or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to greenhouse gas emissions; therefore, no mitigation measures are required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

No Impact: The HEU and SEU are policy documents consistent with the City’s General Plan. The proposed project does not include physical changes in the environment and does not directly involve future development. The SEU addresses the protection of the existing and future population and development from both natural and human-caused hazards through goals, policies, and implementation programs. Among these are measures to reduce risks related to hazardous materials. SEU Goal 4 aims to “reduce likelihood of hazardous materials release, exposure, and contamination in Sonora”.

Construction activities associated with future development projects would likely involve the temporary transportation, management, and use of oils, fuels, and other potentially flammable substances, such as paints, solvents, and cleaners. Hazardous materials that may be present during operation of future development projects are usually associated with landscaping and building maintenance and are not

considered a significant risk. However, all future development in the City would be subject to federal, State, and local regulatory requirements related to the transport, use, or disposal of hazardous materials. Therefore, the proposed project would have no impact related to the routine transport, use, or disposal of hazardous materials. No mitigation measures are required.

b) *Would the project 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?*

No Impact: Potential future residential uses enabled by the City's HEU are generally not characterized as substantial generators or hazardous materials, nor are they anticipated to result in upset or accident conditions involving the release thereof. The capital improvement projects suggested in the SEU are not anticipated to result in upset or accident conditions involving hazardous materials either. The SEU addresses the protection of the existing and future population and development from hazardous materials through hazard-specific policies and implementation measures.

The proposed project involves two policy documents and would not directly result in physical changes in the environment. Any future development would be subject to all applicable regulatory requirements concerning the proper handling, treatment, and disposal of hazardous materials. The proposed project would have no impacts related to upset and accident conditions involving the release of hazardous materials. No mitigation measures are required.

c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

No Impact: The City of Sonora has three high schools (Sonora High School, Theodore Bird High School, and Dario Casina High School), two pre-schools, and one elementary school within City limits. The Lemke site identified by the HEU as a potential residential development site is located approximately 0.25-mile from Sonora Elementary School. Additionally, the capital improvement projects suggested in the SEU may be located within 0.25-mile of a school. However, potential hazardous material-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site is known. At such time that a development proposal is considered that project will be subject to the development review process. Potential future residential uses enabled by the City's HEU are generally not characterized as substantial generators or hazardous materials, nor are they anticipated to result in upset or accident conditions involving the release thereof. The capital improvement projects suggested in the SEU are not anticipated to result in upset or accident conditions involving hazardous materials either. The SEU addresses the protection of the existing and future population and development from hazardous materials through hazard-specific policies and implementation measures. The proposed project evaluated herein includes two policy documents and does not directly propose physical changes in the environment. Therefore, the proposed project would have no impacts related to the emission or handling of hazardous materials within 0.25-mile of a school. No mitigation measures are required.

d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact: According to the Department of Toxic Substances Control, there are 16 potential hazardous waste sites active, certified, historical, or needing evaluation in and near Sonora city limits.¹² None of the listed sites coincide with potential project sites identified in the HEU and SEU. The City and surrounding area do not contain

¹² California Department of Toxic Substances Control. 2024. *EVIROSTOR Project Search Results*. Website: https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Sonora&zip=&county=&case_number=&business_name=&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True. Accessed June 14, 2024.

heavy industrial uses that would create a hazardous material risk in the event of a spill, release, or natural disaster. SR 49 and SR 108 pass through Sonora and are the two primary transit routes through the surrounding area. However, the transport of hazardous materials along SR 49 and/or SR 108 would be subject to all applicable State, regional, and local regulations regarding safe transport of hazardous materials.

The proposed project involves two policy documents and does not directly propose development. Any future development would be subject to all applicable regulatory requirements concerning the proper handling, treatment, and disposal of hazardous materials. Hazardous materials concerns are location- and project-specific and cannot be meaningfully assessed until a project and project site have been defined. Therefore, the proposed project would have no impacts related to sites that are included on a list of hazardous materials sites. No mitigation measures are required.

- e) *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?***

No Impact: There are no public use airports in Sonora, and the City is not located within an airport land use plan. The nearest public use airport is located approximately 2.1 miles northwest in Columbia. The HEU and SEU are policy documents that analyze housing and safety needs in the City. The SEU considers aircraft hazards and risks associated with the Columbia Airport and includes a policy to coordinate with Tuolumne County regarding aircraft and flight safety regulations implemented at the airport. It is not anticipated that any future development in the City would result in a safety hazard or excessive noise related to proximity to Columbia Airport. Therefore, the proposed project would have no impact related to excessive noise and safety hazards within an airport land use plan or two miles of a public use airport. No mitigation measures are required.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

No Impact: The City of Sonora does not currently have an emergency response plan or emergency evacuation plan. At the time of publication of this IS/ND, the City is in the process of developing its Emergency Operations Plan. The City is within the boundaries of the Tuolumne County Emergency Operations Plan. State Routes 49 and 108 are the only two transit routes that provide ingress and egress for the City; SR 49 and SR 108 would be the primary evacuation routes for any emergency in the City. The City's General Plan identifies South Washington Street as the primary evacuation route toward SR 108 (southern and western route), North Washington Street (SR 49) as the primary evacuation route toward northbound SR 49, and Mono Way East as the primary evacuation route eastward toward SR 108.¹³

The SEU addresses the protection of the existing and future population and development from both natural and human-caused hazards through a number of goals, policies, and implementation measures. Among these are implementation measures related to the creation of an emergency evacuation plan and a study of the existing conditions for evacuation in the City, as well as measures to provide and maintain a sufficient emergency response system for the City. All future development in the City would be required to comply with the provisions of the City's General Plan, Local Hazard Mitigation Plan, and all regional and local regulations and plans related to evacuation and emergency response. The proposed project includes two policy documents and does not directly involve development. Therefore, the proposed project would result in no impacts related to an emergency response or evacuation plan. No mitigation measures are required.

¹³ City of Sonora. 2020. *General Plan Safety Element*. Website: <https://sonoraca.com/wp-content/uploads/2018/09/SonoraGeneralPlan2020-revision-2017-10-16-17-CC-adopted.pdf>. Accessed June 14, 2024.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact: Almost the entire City is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) by CALFIRE. The unincorporated areas of Tuolumne County surrounding the City are designated as VHFHSZ or High FHSZ.¹⁴ The SEU addresses the protection of the existing and future population and development from both natural and human-caused hazards through goals, policies, and implementation measures. Among these are measures to minimize the risk from the hazards of wildfire and to ensure the protection of people and wildlife from hazardous materials in the community.

Future development in the City would be required to comply with the provisions of the City's General Plan and all State, regional, and local regulatory requirements related to hazardous materials and wildfire. The proposed project involves two policy documents and does not directly propose any development. Therefore, the proposed project would not expose people or structures to loss, injury, or death involving wildland fires. No impact would occur, and no mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to hazards and hazardous materials; therefore, no mitigation measures are required.

¹⁴ California Department of Forestry and Fire Protection. 2024. *Fire Hazard Severity Zone Viewer*. Website: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed June 14, 2024.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

No Impact: The proposed project includes two policy documents which are consistent with the City's General Plan and do not directly propose physical changes to the environment. Potential future projects suggested in the SEU would include capital improvement efforts intended to preserve and enhance water drainage in the City. Future development in the City would be required to follow State, regional, and local regulations regarding onsite stormwater retention, to prevent contamination of surface waters and local groundwater. In order to comply with the federal National Pollutant Discharge Elimination System (NPDES) requirements and maintain the Central Valley Region Municipal Separate Storm Sewer System (MS4) permit, the Tuolumne County Utilities District, which provides sewer and wastewater services to most of the City, is required to screen and monitor its runoff to avoid compromising downstream water quality standards. Future development projects would be

required by the City to implement BMPs for construction and, if appropriate, SWPPPs to avoid erosion, pollution, sedimentation, and runoff that would degrade water quality. Therefore, the proposed project would have no impact on water quality standards, waste discharge requirements, or surface or groundwater quality. No mitigation measures are required.

b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

No Impact: The City's water infrastructure is owned, maintained, and operated by the Tuolumne Utilities District (TUD). TUD has a contract with Pacific Gas and Electric Company (PG&E) which provides for a perpetual water supply from the South Fork of the Stanislaus River. The water is stored in Pinecrest Lake, Lyons Reservoir, Phoenix Lake, and other small reservoirs on the TUD ditch system, from which it is conveyed through a network of ditches, pipelines, and treatment plants to the TUD service area. The Tuolumne Main Canal, which leads from Lyons Reservoir to the Phoenix powerhouse, is a primary component of the conveyance system and includes 15.7 miles of pipeline, some of which is outdated. The surface water supply from the Stanislaus River accounts for approximately 97 percent of the potable water supply provided by the TUD. The TUD is not currently using groundwater as a primary source of water supply, however, when maintenance work must be conducted on the Tuolumne Main Canal, the TUD uses storage tanks and approximately 25 limited capacity groundwater wells to supply water. According to the TUD Urban Water Management Plan, groundwater is limited due to the impermeable bedrock that covers most of Tuolumne County.¹⁵

Any future development would also be subject to all applicable State, regional, and local regulatory requirements concerning the efficient use and conservation of water resources and preservation of groundwater resources and quality. The proposed project includes two policy documents and does not directly involve any development. Therefore, the proposed project would have no impact on groundwater supplies or recharge. No mitigation measures are required.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- i) *Result in substantial erosion or siltation on- or off-site?***
- ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***
- iii) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***
- iv) *Impede or redirect flood flows?***

No Impact: The proposed project includes two policy documents that are consistent with the City's General Plan and do not directly propose physical changes to the environment. The City's SEU contains goals, policies, and implementation measures intended to minimize risk from flooding or erosion. Any potential future development related to the SEU would include capital improvement projects designed to improve existing drainage patterns and minimize the risk of damage as a result of flooding. Potential impacts related to drainage are unique to a project and cannot be meaningfully determined until a project and project site have been defined. Future development in the City would be required to follow State, regional, and local regulations regarding drainage, erosion, and runoff. The TUD is required to screen and monitor its runoff to avoid compromising downstream water quality standards to comply with federal NPDES requirements and maintain the Central Valley Region MS4 permit. The City would also require BMPs for construction in order to avoid

¹⁵ Tuolumne Utilities District. 2021. *2020 Urban Water Management Plan for Tuolumne Utilities District*. Website:

https://tudwater.com/wp-content/uploads/2021/07/TUD-2020-UWMP_Adopted-June-2021.pdf. June. Accessed June 14, 2024.

erosion, pollution, sedimentation, and runoff that would degrade water quality. Therefore, the proposed project would have no impact related to drainage patterns or the course of a stream or river. No mitigation measures are required.

d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

No Impact: The City is located approximately 117 miles from the ocean and is not at risk from tsunamis. There are no bodies of water in the City that could put the City at risk from a seiche. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the Woods Creek area is mapped within the FEMA 100-year flood zone.¹⁶ A 100-year flood zone has a 1 percent chance of experiencing a major flood in any given year. There are no other federally mapped flood hazard zones in Sonora. However, the City has experienced extreme flooding in recent years as a result of severe weather events, and areas around Sonora Creek and the Downtown have experienced damage or been at risk. The SEU contains goals, policies, and implementation measures intended to minimize flood hazard risks and increase the resiliency of the community to flood events. Any potential future development projects related to the SEU would improve and reinforce existing drainage patterns and capabilities in flood-prone areas of the City.

Future development would be subject to all applicable federal, State, and local regulatory requirements concerning flood hazards, including measures identified in the City's General Plan. The proposed project includes two policy documents and does not directly propose any development. Therefore, the proposed project would have no impact on the release of pollutants in a flood hazard, tsunami, or seiche zone. No mitigation measures are required.

e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

No Impact: The proposed project involves updating two policy documents and does not propose any land use changes or authorize any physical development. Any future development that occurs pursuant to the SEU or HEU would be subject to State, regional, and local regulations regarding water quality, runoff, and hydrology, as well as to City planning, engineering, and building requirements. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impacts would occur, and no mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to hydrology and water quality; therefore, no mitigation measures are required.

¹⁶ Federal Emergency Management Agency. 2009. *FEMA Flood Map Service Center – Tuolumne County*. Website: <https://msc.fema.gov/portal/search?AddressQuery=sonora%20ca>. Accessed June 14, 2024.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

- a) ***Would the project physically divide an established community?***
- b) ***Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

No Impact: The City has prepared its HEU and SEU in accordance with Section 65580 and Section 65302(g) of the Government Code, respectively. The updates have also been prepared consistent with the City's General Plan and the community's vision of its housing and safety needs and objectives. Accordingly, the HEU examines the City's housing needs as they exist currently, and projects future housing needs based on RHNA allocation. No change to the land use plan is proposed as part of the HEU. The HEU includes the establishment of the Regional Housing Needs Allocation Overlay Zone District at the Lemke site, however, this District would layer on top of the existing base R3 zoning regulations, leaving in place the option to develop under the base zoning, but providing the opportunity to develop the property through a ministerial by-right approval process should an applicant propose 20 percent low-income deed restricted affordable housing. The SEU identifies and evaluates both natural and human-caused hazards in the City and includes goals, policies, and implementation measures designed to minimize the City's hazard risks and vulnerabilities. Any subsequent discretionary actions or development that occur(s) pursuant to the HEU or SEU policies would be reviewed and processed in accordance with City planning policies. The HEU and SEU have been prepared in compliance with State law, and no actual development is proposed at this time. No potential adverse impacts related to land use would occur as a result of the proposed project. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to land use and planning; therefore, no mitigation measures are required.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

- a) ***Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***
- b) ***Would the project 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?***

No Impact: The City of Sonora was historically a gold-mining town and is known for having rich mineral deposits. According to the California Department of Conservation Mineral Land Classification Maps, the City of Sonora is comprised of three mineral resource zones (MRZ-2b, MRZ-3a, and MRZ-3b). MRZ-2b includes areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present. MRZ-3a includes areas containing known mineral occurrences of undetermined mineral resource significance. MRZ-3b includes areas containing inferred mineral occurrences of undetermined mineral resource significance, but with geologic settings that appear to be favorable environments for the occurrence of specific mineral deposits.¹⁷ Additionally, the City's General Plan recognizes three mineral resource zones throughout the City which are characterized as having precious metals, including lode gold and silver. Much of these mineral resources are no longer available because of existing development, however, the General Plan Conservation and Open Space Element seeks to preserve the City's remaining mineral resources to the extent feasible.¹⁸

The proposed project includes two policy documents that are consistent with the General Plan. No land use changes are proposed, and the project would not result in direct physical changes to the environment. Future development would be subject to all State, regional, and local rules and regulations pertaining to the preservation of mineral resources. Therefore, the proposed project would have no impact on a known mineral resource or the availability of a locally important mineral resource recovery site. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to mineral resources; therefore, no mitigation measures are required.

¹⁷ California Department of Conservation. 2019. *CGS Information Warehouse: Mineral Land Classification Maps (SMARA Study Areas)*. Website: <https://maps-cnra-cadoc.opendata.arcgis.com/datasets/Of5d685bb11e4c88abc73b7376d4bbca/explore?location=38.056064%2C-119.853535%2C9.11>. Accessed June 14, 2024.

¹⁸ City of Sonora. 2020. *General Plan Conservation and Open Space Element*. Website: <https://sonoraca.com/wp-content/uploads/2018/09/SonoraGeneralPlan2020-revision-2017-10-16-17-CC-adopted.pdf>. Accessed June 14, 2024.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) 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?	☐	☐	☐	☒
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒

a) Would the project result in 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?

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

No Impact: The HEU and SEU are both policy documents and would not result in direct physical changes to the environment. Potential noise impacts are project-specific and cannot be meaningfully determined until a project and project site have been defined. Future development would be required to adhere to the goals, policies, and implementation measures outlined in the General Plan Noise Element and the City's Municipal Code. Therefore, the proposed project would have no impact associated with an increase in ambient noise or the generation of excessive groundborne vibration or noise. No mitigation measures are required.

c) 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?

No Impact: The City of Sonora is located more than two miles from the nearest public use airport and is not located within an airport land use plan. The HEU and SEU are policy documents, and no development is proposed at this time. Future development would be required to adhere to the policies of the City's General Plan Noise Element and the City's Municipal Code. Therefore, the proposed project would have no impact related to excessive noise levels within the vicinity of a public use airport or airport land use plan. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to noise; therefore, no mitigation measures are required.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

- a) ***Would the project 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)?***
- b) ***Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

No Impact: The City of Sonora experienced a population growth of 0.75 percent from 2010 to 2021, however the population decreased at a rate of -1.26 percent between 2020 and 2021. The population of Tuolumne County has been decreasing as well, and according to the California Department of Transportation’s Economic Forecast for Tuolumne County, the population is expected to continue to decrease at a rate of approximately 0.5 percent through 2028, because a significant portion of the County’s population is elderly and continuing to age, and in-migration is minimal.¹⁹ The housing stock in Sonora increased by approximately 2.6 percent between 2015 and 2023; the City has experienced housing growth at a rate that corresponds with population growth. The RHNA allocation for the City’s 2024-2029 HEU is two units, including one very low-income unit and one low-income unit. As shown in Table 2-1, the City has two undeveloped sites with land use designations and zoning permissive of residential development that could accommodate the RHNA allocation in all relevant income categories. The table illustrates a surplus capacity of 152 units, including 52 very low income and 52 low-income units, based on possible residential development over the planning period.

Any potential future development pursuant to the HEU or SEU would be consistent with State and regional growth mandates. The proposed project includes two policy documents and does not directly involve any development. The proposed project would not displace housing or people and is intended to promote affordability and increase housing supply, which could support retention of households in all income categories. Therefore, the proposed project would have no impact related to unplanned population growth or the displacement of a significant number of people. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to population and housing; therefore, no mitigation measures are required.

¹⁹ California Department of Transportation. 2023. *Tuolumne County Economic Forecast*. Website: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/data-analytics-services/transportation-economics/socioeconomic-forecasts/2023/2023-pdf/tuolumne-2023-a11y.pdf>. Accessed June 14, 2024.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) 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:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

- a) ***Would the project 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:***

Fire protection?

No Impact: The Sonora Fire Department (SFD) provides fire protection services to the City. The SFD has one fire station located at 201 South Shepherd Street. The proposed project, which includes the HEU and SEU, would implement policies to promote maintenance of acceptable service ratios, response times, and other performance objectives for fire protection. Additionally, since the City is within a CALFIRE-designated VHFHSZ, the SEU includes implementation measures to enforce the most recent California Fire Code standards during development, as well as wildfire adaptation and mitigation measures, including potential retrofitting efforts for outdated buildings. Compliance with these standards would reduce the fire vulnerability of new and old structures in the City. The HEU and SEU are policy documents, and do not directly involve any development. All future development would be subject to review and approval by the SFD. Additionally, all future development would be required to adhere to all State and local regulations regarding fire protection and building standards, as well as policies and implementation standards outlined in other sections of the General Plan. Therefore, the project would have no impact on fire protection services, and no mitigation measures are required.

Police protection?

No Impact: The Sonora Police Department provides police services and protection to the City. The Sonora Police Station is located at 100 South Green Street. The proposed project includes two policy documents and does not directly propose any development. The HEU and SEU would implement policies to promote maintenance of acceptable service ratios, response times, and other performance objectives for police protection. Future development would be required to adhere to State and local regulations, including any relevant policies in the General Plan, intended to maintain adequate police protection services. Therefore, the proposed project would have no impact on police protection services, and no mitigation measures are required.

Schools?

No Impact: The Sonora Union High School District and Sonora Elementary School District serve the City. School-related impacts depend on the location, type, and size of a project, including students generated per household, and the capacity of facilities in a given attendance area. Impacts to schools cannot be meaningfully determined until a project is defined. The HEU and SEU are policy documents and do not directly involve any future development. Future development would be required to pay development impact fees, pursuant to the City's General Plan and Municipal Code, to offset potential development impacts. Therefore, the project would have no impact on schools, and no mitigation measures are required.

Parks?

No Impact: Park-related impacts depend on the location, type, and size of a project. The City of Sonora has numerous parks, open space areas, and trails. However, the HEU and SEU are policy documents and do not directly involve any future development. All future development would be required to adhere to State and local regulations, including policies and measures outlined in the General Plan to preserve park and recreation facilities. Therefore, the proposed project would have no impact on parks, and no mitigation measures are required.

Other public facilities?

No Impact: The HEU and SEU are policy documents and do not directly involve any development. All future development would be required to adhere to all applicable State and local regulations. Therefore, the proposed project would have no impact on other public facilities, and no mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to public services; therefore, no mitigation measures are required.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) 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?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

- a) 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?**

No Impact: Impacts to recreational facilities depend upon the location, type, and size of a project. The City of Sonora has numerous public parks, trails, and open space areas. Impacts to recreational facilities cannot be meaningfully determined until a project is defined. The HEU and SEU are policy documents and do not directly involve any development. Future development would be required to adhere to all applicable State and local regulations, including policies and measures outlined in other sections of the General Plan intended to preserve the City's recreational facilities. Therefore, the proposed project would have no impact on recreational facilities, and no mitigation measures are required.

- b) 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?**

No Impact: The proposed project includes two policy documents and does not directly involve any development or construction. Therefore, the project would not construct any recreational facilities or require the expansion of recreational facilities. Therefore, the proposed project would have no impact on new or expanded recreational facilities. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to recreation; therefore, no mitigation measures are required.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact: Impacts related to transportation and circulation depend on the location, type, and size of a project, and cannot be meaningfully determined until a project and project site are defined. The HEU and SEU are policy documents consistent with the City's General Plan and Zoning Code. The updates do not include any changes to land use designations, building heights and intensities, or residential densities. The HEU includes the creation of the Regional Housing Needs Assessment Overlay Zone District on the Lemke site, which would layer on top of the base R3 zoning regulations, leaving in place the option to develop under the base zoning, but providing the opportunity to develop the property through a ministerial by-right approval process should an applicant propose 20 percent low-income deed restricted affordable housing. Any future development in the City would be required to adhere to all applicable State and local regulations, programs, ordinances, and policies that address circulation, including those in the General Plan Circulation Element and the City's Municipal Code. Therefore, the proposed project would have no impact on circulation, and no mitigation measures are required.

d) Would the project result in inadequate emergency access?

No Impact: Many streets in Sonora lack proper width and turning radii for emergency vehicle access. Several streets allow for on-street parking that limits emergency vehicle access, and certain subdivisions within the City only have one point of ingress/egress that could become blocked during an emergency scenario. The SEU addresses the protection of existing and future population and development from both natural and human-caused hazards through goals, policies, and implementation measures. Among these include policies and programs intended to increase adequate emergency vehicle access and evacuation routes in the City; SEU Goal 8 aims for "decreased vulnerability to critical facilities, residents, and visitors to hazard events through proper evacuation planning". To ensure adequate emergency access, future development in the City would be required to comply with the provisions of the Municipal Code during construction and operation. Future development

would also be required to adhere to all applicable local regulations and policies, including those of a potential future evacuation plan. The proposed project includes two policy documents and does not directly involve any development. Therefore, the proposed project would have no impact on emergency access, and no mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to transportation; therefore, no mitigation measures are required.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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)?***
- 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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

No Impact: According to California Public Resources Code Section 21084, a project may have a significant effect on the environment if the project “may cause a substantial adverse change in the significance of an historical resource”. Assembly Bill 52 (AB 52) specifies that a project with the potential for adverse effects on tribal cultural resources may be considered a significant effect on the environment. Senate Bill 18 (SB 18) requires a government-to-government consultation process initiated by the local governmental agency prior to adoption or amendment of a General or Specific Plan.

The City, as the Lead Agency pursuant to CEQA and as required by AB 52 and SB 18, initiated consultation on August 29, 2024 through mailing, via certified mail, and emailing AB 52 and SB 18 consultation letters for the proposed project, including project information and contact information to ten Native American tribes. The tribal governments provided with an AB 52 consultation letter include the following list of recipients:

- Buena Vista Rancheria of Me-Wuk Indians²⁰
- Calaveras Band of Mi-Wuk Indians²¹
- Chicken Ranch Rancheria of Me-Wuk Indians²²
- Lone Band of Miwok Indians
- Jackson Rancheria Band of Miwuk Indians²³
- Nashville Enterprise Miwok-Maidu-Nishinam Tribe²⁴
- Pakan'yani Maidu of Strawberry Valley Rancheria
- Southern Sierra Miwuk Nation²⁵
- Tule River Indian Tribe
- Wuksachi Indian Tribe/Eshom Valley Band

Under SB 18, Native American tribes have 90 days to respond and request further project information and/or formal consultation. On August 29, 2024, the City received a response from the Calaveras Band of Mi-Wuk Indians stating that the Calaveras Band of Mi-Wuk Indians refers to Tuolumne Rancheria and Chicken Ranch Rancheria of Me-Wuk Indians. No further consultation was requested. On August 30, 2024, the City received a response from the Chicken Ranch Rancheria of Me-Wuk Indians confirming receipt of the notification and stating that Chicken Ranch Rancheria would reach out again if there were concerns found with the project. No further contact was received, and no consultation was requested. The City did not receive any other responses during the consultation period.

The HEU and SEU are policy documents that would not directly result in development or construction. To date, two Tribes responded during the consultation process and did not have any comments or concerns. The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k). Therefore, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to tribal cultural resources; therefore, no mitigation measures are required.

²⁰ AB 52 and SB 18 letters were sent to two contacts at the Buena Vista Rancheria of Me-Wuk Indians.

²¹ AB 52 and SB 18 letters were sent to three contacts at the Calaveras Band of Mi-Wuk Indians.

²² AB 52 and SB 18 letters were sent to four contacts at the Chicken Ranch Rancheria of Me-Wuk Indians.

²³ AB 52 and SB 18 letters were sent to two contacts at the Jackson Rancheria Band of Miwuk Indians. One contact was notified only by certified mail, as no email address was provided.

²⁴ AB 52 and SB 18 letters were sent to two contacts at the Nashville Enterprise Miwok-Maidu-Nishinam Tribe. One contact only provided a phone number; the City called and left a voicemail for this contact.

²⁵ AB 52 and SB 18 letters were sent to two contacts at the Southern Sierra Miwuk Nation.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

No Impact: The proposed project includes the adoption of the City's HEU and SEU, which are policy documents that would not directly result in development or construction. The HEU identifies two currently undeveloped sites as suitable for potential housing development to meet the RHNA allocation. According to the HEU, principal site improvements required upon development of a vacant property in the City include the undergrounding of electrical, gas, and telecommunication lines to the structure, installation of a public sewage system, grading and improvement of public and private streets, storm drainage and flood control facilities within and outside the subdivision, a water supply system providing an adequate supply of potable water to each lot and fire hydrant, and fire hydrants and connections.

All future development in the City would be subject to all applicable State, regional, local, and utility provider regulations and requirements concerning the installation of utilities. Utility services impacts depend on the project type and location and cannot be meaningfully determined until a project has been defined. Therefore, the proposed project would have no impacts related to the construction or expansion of new or expanded

water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities. No mitigation measures are required.

b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

No Impact: According to the 2020 Tuolumne Utilities District Urban Water Management Plan (UWMP), approximately 97 percent of the District's water is imported from the South Fork of the Stanislaus River through a contract with PG&E. The UWMP states that multiple dry years have minimal impact on the District's water supply because the District's water source does not rely on carry-over storage, and the reservoirs used to store water for the District are refilled every year to meet demand. According to the UWMP, TUD's surface water supply from the South Fork of the Stanislaus River is expected to be 100 percent reliable during all year types, and all single dry year and multiple dry year projections for 2025, 2030, 2035, 2040, and 2045 demonstrate a significant surplus of water supply for the entire District.²⁶ Therefore, the District expects that, under all hydrologic conditions, purchased water supplies (in combination with groundwater supplies) will fully serve potable water demands.

All future development would be required to comply with all applicable State, regional, and local regulatory requirements concerning the efficient use and conservation of water resources, including measures identified in the City's General Plan. The proposed project includes two policy documents and does not directly involve any development. Therefore, the proposed project would have no impact on water supplies, and no mitigation measures are required.

c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

No Impact: Wastewater treatment in the City occurs through either private septic tanks or through the TUD Regional Wastewater Treatment Plant located in the southwestern portion of the City. The TUD owns, operates, and maintains the sewer system that services the majority of the City and consists of gravity sewers, lift stations, and approximately 140 miles of pipeline to collect wastewater from the TUD service area. The Regional Wastewater Treatment Plant provides advanced primary and secondary treatment for approximately 1.2 million gallons per day of wastewater.²⁷ The plant is capable of treating an average of 2 million gallons of wastewater per day.²⁸

The proposed project includes two policy documents and does not directly involve any development. All future development would be subject to all applicable State, regional, and local regulatory requirements concerning the efficient use and conservation of water resources, including measures identified in the City's General Plan. Therefore, the proposed project would have no impact on wastewater treatment capacity, and no mitigation measures are required.

d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

No Impact: The City of Sonora contracts with Waste Management/Cal Sierra Disposal to provide solid waste services within the City. Cal Sierra Disposal operates the Buy Back Center Recycling Center, a Transfer Station,

²⁶ Tuolumne Utilities District. 2021. *2020 Urban Water Management Plan for Tuolumne Utilities District*. Website:

https://tudwater.com/wp-content/uploads/2021/07/TUD-2020-UWMP_Adopted-June-2021.pdf. June. Accessed June 14, 2024.

²⁷ Tuolumne Utilities District. 2024. *TUD's Sewer System*. Website: <https://tudwater.com/customer-service/sewer-services/>. Accessed June 14, 2024.

²⁸ Tuolumne Utilities District. 2024. *"Tuolumne Utilities District Celebrates Completion of New Sonora Regional Wastewater Treatment Facility."* May 28, 2024. Website: <https://tudwater.com/sonora-regional-celebration/>. Accessed June 14, 2024.

and the Cal Sierra Earth Resource Facility in Sonora.²⁹ The proposed project involves two policy documents and does not directly involve any development. Future development would be required to comply with all applicable federal, State, regional, and local standards, management and reduction statutes, and regulations related to solid waste. Therefore, the proposed project would have no impact on solid waste generation or compliance with applicable regulations related to solid waste. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to utilities and service systems; therefore, no mitigation measures are required.

²⁹ Waste Management. 2024. *Cal Sierra Disposal*. Website:

<https://www.wm.com/location/california/tuolumne/sonora/locations/index.jsp>. Accessed June 18, 2024.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) 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?	☐	☐	☐	☒

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact: Most of the City is designated as a VHFHSZ by CALFIRE. As mentioned in Section 3.9, Hazards and Hazardous Materials, the City of Sonora does not currently have an emergency response plan or emergency evacuation plan. At the time of publication of this IS/ND, the City is in the process of developing its Emergency Operations Plan. The City is within the boundaries of the Tuolumne County Emergency Operations Plan. State Routes 49 and 108 are the only two transit routes that provide ingress and egress for the City; SR 49 and SR 108 would be the primary evacuation routes for any emergency in the City. The City's General Plan identifies South Washington Street as the primary evacuation route toward SR 108 (southern and western route), North Washington Street (SR 49) as the primary evacuation route toward northbound SR 49, and Mono Way East as the primary evacuation route eastward toward SR 108.³⁰

Many streets in Sonora lack proper width and turning radii for emergency vehicle access. Several streets allow for on-street parking that limits emergency vehicle access, and certain subdivisions within the City only have one point of ingress/egress that could become blocked during an emergency scenario. The SEU addresses the protection of existing and future population and development from both natural and human-caused hazards through goals, policies, and implementation measures. Among these include policies and programs intended to increase adequate emergency vehicle access and evacuation routes in the City; SEU Goal 8 aims for "decreased vulnerability to critical facilities, residents, and visitors to hazard events through proper evacuation planning". The SEU also includes goals, policies, and implementation measures to reduce the risk of fire hazards in the City. However, potential impacts related to emergency response and evacuation are unique to a project and cannot be meaningfully determined until a project has been defined. To ensure adequate

³⁰ City of Sonora. 2020. *General Plan Safety Element*. Website: <https://sonoraca.com/wp-content/uploads/2018/09/SonoraGeneralPlan2020-revision-2017-10-16-17-CC-adopted.pdf>. Accessed June 14, 2024.

emergency access, future development in the City would be required to undergo review by the SFD and to comply with the provisions of the Municipal Code during construction and operation. Future development would also be required to adhere to all applicable local regulations and policies, including those of a potential future evacuation plan. The proposed project includes two policy documents and does not directly involve any development. Therefore, the proposed project would have no impact on an emergency response plan or emergency evacuation plan, and no mitigation measures are required.

b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

No Impact: Most of the City is designated as a VHFHSZ by CALFIRE, and a substantial amount of land in the City consists of hillsides and sloped terrain. The sites identified in the HEU as potential locations for future residential development both contain hilly, wooded terrain. The SEU includes measures intended to minimize the risk of fire hazards and increase the resiliency of the community to future wildfires. However, potential impacts related to fire exacerbation are unique to a project and cannot be meaningfully determined until a project has been defined. The proposed project includes two policy documents and does not directly involve any development. Future development in the City would require project-specific review on behalf of the SFD. Future development would also be required to comply with the provisions of the City's General Plan, LHMP, and all other local regulations pertaining to wildfire risks during construction and operation. Therefore, the proposed project would have no impact related to exacerbated wildfire risks, pollutant concentrations from wildfire, or uncontrolled spread of wildfire. No mitigation measures are required.

c) *Would the project 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?*

No Impact: According to the HEU, principal site improvements required upon development of a vacant property in the City include the undergrounding of electrical, gas, and telecommunication lines to the structure, installation of a public sewage system, grading and improvement of public and private streets, storm drainage and flood control facilities within and outside the subdivision, a water supply system providing an adequate supply of potable water to each lot and fire hydrant, and fire hydrants and connections. Any potential future development on either of the housing sites identified in the HEU would require the installation of infrastructure that could exacerbate fire risks. The SEU includes measures to minimize the risk of fire hazards to existing and future development in the City. However, the proposed project includes two policy documents and does not directly involve any development. Any future development in the City, including development pursuant to the HEU or SEU, would require project-specific review on behalf of the SFD. Potential impacts related to utility installation and fire exacerbation are unique to a project and cannot be meaningfully determined until a project has been defined. Additionally, all future development would be required to comply with all applicable State, regional, local, and utility provider regulations pertaining to infrastructure improvements and wildfire risk. Therefore, the proposed project would have no impact related to the installation or maintenance of associated infrastructure that may exacerbate fire risk. No mitigation measures are required.

d) *Would the project 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?*

No Impact: Most of the City is designated as a VHFHSZ by CALFIRE, and a substantial amount of land in the City consists of sloped, wooded terrain susceptible to landslide risks. According to the HEU, principal site improvements required upon development of a vacant property in the City include storm drainage and flood control facilities within and outside the subdivision. The SEU includes measures intended to minimize the risk of fire hazards in the City. However, potential impacts related to post-fire instability and drainage changes are unique to a project type and location and cannot be meaningfully determined until a project has been defined. Future development in the City would require review by the SFD. Future development would also be required to comply with all applicable State, regional, and local regulations regarding wildfire hazards, water quality

standards, and drainage. The proposed project includes two policy documents and does not directly involve any development. Therefore, the proposed project would have no impacts related to downslope or downstream flooding or landslides. No mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to wildfire; therefore, no mitigation measures are required.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	☒
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

- a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***
- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***
- c) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

No Impact: As demonstrated throughout this document, the proposed project would have no impacts to Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfires. Implementation of the City’s HEU and SEU would not create any significant or adverse impacts and would therefore not contribute to any cumulatively considerable impacts. The proposed project involves adoption of two policy documents consistent with the General Plan and does not include any changes to land use

designations, building heights and intensities, or residential densities. Therefore, the proposed project would have no impacts or cumulatively considerable impacts on the environment.

4 List of Preparers

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