

RESOLUTION NO. 26-27-XX

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SUTTER CREEK, CALIFORNIA, AUTHORIZING STAFF TO PROVIDE FORMAL CEQA COMMENTS REGARDING THE AMADOR COUNTY UNIFIED SCHOOL DISTRICT SCHOOL CONSOLIDATION PROGRAM PROJECT AND DIRECTING TRANSMITTAL TO THE DISTRICT

WHEREAS, the Amador County Unified School District ("District" or "ACUSD") has prepared an Initial Study / Mitigated Negative Declaration (IS/MND) pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code § 21000 *et seq.*) for the ACUSD School Consolidation Program Project; and

WHEREAS, the proposed Project includes consolidating all countywide high school upperclassmen in Grades 10 through 12 at Amador High School within the municipal boundaries of the City of Sutter Creek, increasing student enrollment at the campus from 573 to 821 students (+43%); and

WHEREAS, the City of Sutter Creek ("City") is an affected public agency with land use, public safety, law enforcement, and municipal roadway maintenance jurisdiction over the streets surrounding Amador High School, including Spanish Street, Sutter-Ione Road, Oro Madre Way, and Old Route 49; and

WHEREAS, the public review period for the IS/MND runs from September 1, 2026, to September 30, 2026; and

WHEREAS, City staff, CEQA legal counsel, and transportation advisors have reviewed the IS/MND, Appendix A, and Appendix D, identifying critical legal, environmental, and technical deficiencies under CEQA, including:

1. **Unstable Project Description:** Reliance on an outdated October 2024 traffic study that modeled Amador High School as a 603-student Junior High School (Grades 7–8) rather than an 821-student Senior High School (Grades 10–12);
2. **Invalid SimTraffic Queuing Model:** Failure to conduct site-specific microscopic traffic simulation for senior high school upperclassmen student drivers, as detailed in **Exhibit A**;
3. **Omission of Physical Vehicle Modal Split:** Application of generic person-trip rates without modeling actual physical student driver vehicle counts;
4. **Unanalyzed Safety Hazards on State Route 49:** Failure to propose signalization or speed control mitigation at SR 49 / Sutter-Ione Road despite satisfying Caltrans Peak Hour Signal Warrants in all scenarios;

5. **Regional Infrastructure Policy Conflict:** Conflict between regional multi-modal transportation goals and regional funding restrictions that prohibit widening municipal streets for pedestrian/bicycle safety;
6. **Unfunded Municipal Parking Burdens:** Shifting off-campus student parking enforcement onto the Sutter Creek Police Department without cost reimbursement; and
7. **Impermissible Deferral of Mitigation:** Deferring implementation of Mitigation Measure TRA-1 (Transportation Demand Management Plan) up to two years post-approval without binding operational standards on Day 1; and

WHEREAS, the City Council desires to submit formal comments requesting that the District withdraw the IS/MND, perform updated site-specific traffic and modal split studies, re-formulate mitigation measures, and recirculate a revised CEQA document or Environmental Impact Report (EIR).

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SUTTER CREEK AS FOLLOWS:

1. **Recitals:** The above recitals are true and correct and are incorporated herein by reference.
2. **Adoption of CEQA Comments:** The City Council hereby authorizes creation of a formal CEQA Comment Letter substantially similar to the one presented at meeting and incorporating Council suggestions.
3. **Direction to Transmit:** The City Manager, or their designated person is hereby authorized and directed to transmit the Comment Letter and Exhibit A to ACUSD Superintendent Jared Critchfield and the ACUSD Board of Trustees prior to 5:00 PM on September 30, 2026.
4. **Authorization to Engage in Inter-Agency Negotiations:** The City Manager and Police Chief are authorized to meet with District representatives to negotiate inter-agency agreements (MOUs) covering off-campus parking enforcement cost reimbursement, School Resource Officer (SRO) funding, and joint traffic management protocols.
5. **Effective Date:** This Resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED at a regular meeting of the City Council of the City of Sutter Creek on this ____ day of September, 2026, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Mayor, City of Sutter Creek

ATTEST:

City Clerk, City of Sutter Creek