



STAFF REPORT

TO: THE HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL
MEETING DATE: SEPT 21, 2026
FROM: TOM DUBOIS, CITY MANAGER
SUBJECT: ACUSD CONSOLIDATION PROJECT CEQA COMMENT LETTER

RECOMMENDATION:

Adopt Resolution No. 25-26-XX to authorize the City Manager to submit a CEQA comment letter substantially similar to Exhibit A regarding the Amador County Unified School District (ACUSD) School Consolidation Program Project IS/MND; direct transmittal to ACUSD prior to the September 30, 2026 public review deadline; and authorize the City Manager to initiate negotiations on a Memorandum of Understanding (MOU) with the District.

BACKGROUND:

ACUSD has issued an Initial Study / Mitigated Negative Declaration (IS/MND) proposing a countywide school consolidation program. Under the current plan, all high school upperclassmen in Grades 10 through 12 will be consolidated at Amador High School in Sutter Creek, increasing student enrollment from 573 to 821 students (+43%). Moving 9th graders off-campus and concentrating 10th through 12th graders fundamentally alters the campus driver demographic, creating a student body composed almost entirely of licensed or license-eligible 16- to 18-year-old drivers.

While the City of Sutter Creek supports the School District, which is faced with declining enrollment, staff's technical review of the IS/MND identified environmental and operational deficiencies under CEQA. If adopted without modification, the project could cause unmitigated traffic gridlock along Spanish Street, Sutter-Ione Road, and State Route 49, while spilling student parking into surrounding residential neighborhoods.

SUMMARY OF CORE CEQA DEFICIENCIES IDENTIFIED

CEQA Issue Area	IS/MND Flaw & Source Citation	Required City Remedy
Flawed Baseline & Queuing Model	Relies on an October 2024 SimTraffic study that modeled a 603-student middle school (Grades 7–8) instead of 821 high school upperclassmen (<i>IS/MND p. 188; App. D p. D-43</i>).	Require new, site-specific SimTraffic modeling for 10th–12th grade upperclassmen driver profiles (Exhibit A).
Missing Vehicle Modal Split	Uses generic ITE person-trip rates (1.94 trips/student) without estimating physical student driver vehicle counts or bus ratios (<i>App. A p. A-42</i>).	Model exact physical vehicle arrivals, bus seat guarantees, and parent drop-off splits.
SR 49 / Sutter-Ione Road Safety	Intersection #7 meets Caltrans Peak Hour Signal Warrants in all scenarios creating an unmitigated physical safety hazard under CEQA Guidelines Appendix G, Section XVII(c), as well as a policy conflict under Section XVII(a). (<i>App. D p. D-77</i>).	Commit to co-apply for state grants for mitigation on SR 49, for example time-of-day 25 MPH flashing warning beacons
ACTC Regional Funding Conflict	Disclaims off-site safety work (<i>p. 175</i>) while ACTC funding rules restrict city grants to resurfacing, prohibiting road widening/sidewalks (in conflict with ACTC Regional planning docs).	Commit to joint Caltrans ATP/HSIP grant applications to fund pedestrian safety improvements.
Deferred TDM Mitigation	Mitigation Measure TRA-1 defers TDM implementation up to 2 years post-approval without binding standards on Day 1 (<i>IS/MND p. 185</i>).	Require Day 1 operational TDM commitments: staggered bell schedules, drop-off valet loops, and permit rules.

DISCUSSION:

The City has until Sept 30 to submit a comment letter to the School District. Staff recommends submitting a letter highly similar to the attached for the following reasons:

1. Establishes Legal Defensibility & Exhausts Administrative Remedies

Under CEQA, affected municipalities must submit specific, evidence-based objections prior to the close of the public review period (September 30, 2026). Failing to challenge the District's reliance on an invalid middle school traffic model or deferred TDM mitigation would waive the City's legal standing and force Sutter Creek residents to absorb all operational traffic and parking impacts permanently.

2. Protects Public Safety & Neighborhood Livability

Concentrating 821 upperclassmen on narrow residential streets (Spanish Street, Oro Madre Way, Sutter-Ione Road) without staggered bell schedules or queuing controls creates severe collision risks and threatens emergency vehicle access. Furthermore, establishing that SR 49 / Sutter-Ione Road satisfies Caltrans Peak Hour Signal Warrants obligates both the District and Caltrans to address high-speed highway traffic safety.

3. Propose Cost Effective Solutions for our Small Budgets (MOU)

Neither the City of Sutter Creek nor ACUSD possesses general fund reserves to pay for daily police overtime or multi-million-dollar roadway widenings. The recommended strategy introduces a pragmatic, low-cost MOU framework that protects both agencies' budgets through three areas:

- Low-Cost Administrative Parking Enforcement: Replaces expensive police ticketing overtime with school administrative discipline. The District incorporates municipal parking rules into the Student Code of Conduct and revokes on-campus parking/extracurricular permits for students who park illegally on City streets.
- Day 1 Operational TDM Controls: Requires a 20-to-30-minute staggered bell schedule between Sutter Creek Elementary and Amador High School, alongside a staff-managed on-campus drop-off valet loop to keep waiting cars off Spanish Street.
- Joint State Grant Partnerships: Instead of disputing unfunded local obligations, the City and District agree to co-apply for Caltrans Active Transportation Program (ATP) and Highway Safety Improvement Program (HSIP) grants to cover 100% of capital costs for SR 49 flashing beacons and Spanish Street pedestrian crosswalks.

BUDGET IMPACT:

The recommended strategy avoids forcing the City to fund police overtime for daily parking enforcement. Positioned as joint grant applicants, the City and District can access state infrastructure grant programs otherwise unavailable to small rural general funds.

ATTACHMENT:

1. Draft City of Sutter Creek Letter to ACUSD on CEQA Findings for Consolidation
2. Resolution Authorizing sending a formal letter to ACUSD
3. Parking enforcement and SRO MOU
4. Notice of Intent by ACUSD