

CITY OF SUTTER CREEK  
18 Main Street, Sutter Creek, CA 95685

September 14, 2026

VIA ELECTRONIC MAIL

Jared Critchfield, Superintendent  
Board of Trustees  
Amador County Unified School District  
217 Rex Avenue  
Jackson, CA 95642

**SUBJECT: Comments on the Initial Study / Mitigated Negative Declaration for the Amador County Unified School District School Consolidation Program Project**

Dear Superintendent Critchfield and Members of the Board of Trustees:

This letter provides the City of Sutter Creek's formal comments on the Initial Study / Mitigated Negative Declaration (IS/MND) for the Amador County Unified School District (ACUSD) School Consolidation Program Project. The City supports the District's goal to consolidate schools due to declining enrollment and wants to work together. However, as the city surrounding Amador High School, we have found several issues in the IS/MND and are concerned about student safety and impacts on nearby residents.

As detailed herein and set forth in Exhibit A (Technical Evaluation of Appendix D SimTraffic Queuing Model Flaws), attached hereto and incorporated by reference into the administrative record, the IS/MND uses an outdated October 2024 traffic study that modeled a middle school rather than the proposed high school. It leaves out site-specific traffic and queuing models for the high school, ignores student driver demographics for Grades 10–12, misses a key conflict regarding regional funding for bike and pedestrian routes, leaves out safety fixes at SR 49 and Sutter-Ione Road, delays Transportation Demand Management (TDM) plans, and pushes parking enforcement costs onto the City.

To address these concerns without placing heavy financial burdens on either agency, the City proposes signing a Memorandum of Understanding (MOU) before project approval. This MOU would cover low-cost administrative parking rules, staggered bell schedules, and joint grant applications.

Below is our detailed CEQA analysis, followed by specific questions for the District to answer in a revised environmental document.

**I. SUBSTANTIVE CEQA DEFICIENCIES**

**1. Unstable Project Description and Flawed Traffic Baseline (*CEQA Guidelines § 15064; County of Inyo v. City of Los Angeles*)**

CEQA requires an accurate and consistent project description. The IS/MND fails this requirement because its traffic analysis relies on an old study that evaluated a completely different campus setup:

- The September 2026 IS/MND states that Amador High School will serve Grades 10 through 12, with enrollment rising from 573 to 821 students (*IS/MND, Section 2, pp. 24, 31; Table 1, p. 35*). However, Appendix D reveals that traffic and queuing calculations used an October 2024 study where Amador High was modeled as a Junior High School (Grades 7–8) with 603 students (*IS/MND, Section XVII, p. 188; Appendix D, pp. D-1, D-40, D-43*).
- Demographic Differences: Removing 9th graders (14- and 15-year-olds who do not drive) and concentrating 10th through 12th graders creates a student body made up mostly of licensed drivers. Modeling high school upperclassmen traffic using middle school student habits potentially underestimates peak-hour trips, arrival patterns, drop-off queues, and parking needs.

## **2. Omission of Site-Specific Traffic & Queuing Modeling for Amador High School**

Instead of conducting new traffic modeling for the 821-student senior high school layout, the District adjusted numbers from the 2024 middle school model (*IS/MND, p. 188; Appendix D, pp. D-40, D-123*).

- The District claims that the October 2024 traffic model was well calibrated and sufficient to evaluate the 821-student campus (*IS/MND, p. 188; Appendix D, p. D-39*). As shown in Exhibit A, using middle school drop-off data to predict high school driver traffic makes the model's queue and travel predictions inaccurate.
- The IS/MND lacks site-specific traffic simulations (SimTraffic) showing arrival times, turn queuing, or drop-off patterns for 821 high schoolers on narrow local roads (Spanish Street, Sutter-Ione Road, and Oro Madre Way). Relying on old middle school data fails to meet CEQA standards for substantial evidence.

## **3. Flawed Trip Generation Metrics & Unanalyzed Modal Mix (Vehicles vs. Person-Trips)**

The IS/MND applies standard Institute of Transportation Engineers (ITE) Land Use Code 525 (High School) trip rates yielding 1.94 daily trips per student (*IS/MND Appendix A, p. A-42; Appendix D, p. D-80*). This methodology contains two major flaws:

- Failure to Model Physical Vehicles: Generic ITE rates measure total person-trips, but fail to isolate the actual modal split (i.e., how many students arrive via school buses, personal student vehicles, parent drop-offs, or biking/walking).
- Increased Vehicle-per-Student Ratio: Excluding 9th graders from campus significantly increases the ratio of licensed drivers per student compared to standard high school averages. The IS/MND provides no empirical modeling of the actual number of physical student vehicles that will arrive on campus daily, leaving its on-campus drop-off queue and off-campus parking analyses unsubstantiated.

## **4. ACTC Conflict Between their Regional Transportation Plan and Funding Policies**

The IS/MND claims that the project will not conflict with the Amador County Transportation Commission (ACTC) Regional Transportation Plan (RTP) or local Circulation Elements because all project improvements occur "solely on-site". This conclusion ignores a fundamental policy conflict:

- RTP Multi-Modal Policy: The ACTC Regional Transportation Plan mandates complete streets, bicycle and pedestrian safety, and non-motorized infrastructure expansion.
- ACTC Restricted Funding Policy: In practice, ACTC's funding allocation policy to local cities restricts grant funds strictly to repaving and resurfacing existing roadway surfaces, prohibiting funds from being used to widen roadways, construct sidewalks, or add bike lanes.
- Low-Cost Joint Grant Partnership Solution: Because ACTC funding is restricted to resurfacing existing pavement and the District disclaims responsibility for off-site improvements, the City lacks local general funds to widen narrow local streets (Spanish Street and Sutter-Ione Road) or build sidewalks. To resolve this without spending local tax dollars, the District must commit in the TDM Plan to co-apply with the City for external state grants—such as Caltrans Active Transportation Program (ATP), Highway Safety Improvement Program (HSIP), and Safe Routes to School grants—to cover 100% of capital costs for pedestrian crosswalks and safety features.

## 5. Unanalyzed Traffic Hazards & Signal Warrant Needs at SR 49 / Sutter-Ione Road (Intersection #7)

The primary regional access point for Amador High School is the unsignalized intersection of State Route 49 and Sutter-Ione Road (Intersection #7), where posted highway speeds reach 55 mph (*Appendix D, p. D-4*) [256, 464]:

- Caltrans Signal Warrants Satisfied: The District's traffic memo confirms that Intersection #7 meets Caltrans Warrant 3 (Peak Hour Signal Warrant) across all evaluated scenarios (Existing, Opening Year 2026, and Cumulative 2040, both with and without the project) under both 100% and 70% warrant factors (*Appendix D, Table 14, pp. D-77, D-123*).
- Mandatory Safety Analysis Under CEQA Guidelines Appendix G, § XVII(c): While Senate Bill 743 (CEQA Guidelines § 15064.3(a); Pub. Res. Code § 21099) eliminated automobile delay and Level of Service (LOS) as standalone environmental metrics, CEQA Guidelines Appendix G, Section XVII(c) strictly requires lead agencies to evaluate whether a project will "*substantially increase hazards due to a geometric design feature or incompatible uses*". Satisfying Caltrans Peak Hour Signal Warrant 3 demonstrates that side-street traffic cannot safely merge onto the highway during peak hours without forced gap acceptance and severe collision risks.
- Policy conflict under CEQA Section XVII(a) with the ACTC Regional Transportation Plan Policy 2F and Sutter Creek General Plan Policies C-1.2.1 and C-1.4.1.
- Dismissal of Physical Safety Hazards: The IS/MND dismisses highway queuing hazards by asserting that "*drivers are attentive when driving and obey traffic laws*" and that adding vehicles to congested roads is not a safety hazard per se. Under CEQA Guidelines Appendix G, § XVII(c), mixing high-speed 55 MPH corridor traffic with turning school buses and novice 10th–12th grade student drivers creates an unmitigated, physical collision hazard that cannot be hand-waved away by assuming driver attentiveness.
- Mitigation: To address this physical safety hazard, the District should commit in the environmental document to co-applying with the City for state grant funds (such as Caltrans ATP/HSIP) to install time-of-day active flashing warning beacons and establish

a reduced 25 MPH School Zone speed limit on SR 49 near Sutter-Ione Road during peak morning arrival (7:30–8:30 AM) and afternoon dismissal (2:30–3:30 PM) hours.

## **6. Unfunded Municipal Burden & Low-Cost Administrative Parking Enforcement**

With 821 upperclassmen on campus, student driver parking demand will exceed available on-campus stalls. The IS/MND proposes to manage spillover parking by establishing "No Parking" zones on Oro Madre Way and Spanish Street and constructing a perimeter fence (*IS/MND*, pp. 186–187; *Appendix D*, p. D-38).

- Unfunded Police Burden: Enforcing municipal parking restrictions solely through police ticketing shifts an unmitigated operational and financial burden onto the Sutter Creek Police Department .
- Cost-Sensitive Administrative Enforcement: Rather than generating police overtime costs, the District must adopt a zero-cost administrative parking enforcement policy. By incorporating municipal parking compliance into the Amador High School Student Code of Conduct, the District can enforce parking rules directly: students who park illegally on Oro Madre Way, Spanish Street, or adjacent residential streets will face immediate revocation of their on-campus parking permits and extracurricular privileges, utilizing campus staff during routine morning rounds.

## **7. Impermissible Deferral & Day 1 TDM Commitments (Mitigation Measure TRA-1)**

The IS/MND relies entirely on Mitigation Measure TRA-1 (Transportation Demand Management Plan) to reduce Vehicle Miles Traveled (VMT) by 2,043 miles/day (*IS/MND*, pp. 185–187; *Appendix D*, pp. D-37–38) . TRA-1 fails CEQA legal standards (*Sundstrom v. County of Mendocino*):

- Impermissible Deferral: TRA-1 explicitly allows ACUSD up to "[w]ithin two years of project approval" to prepare and implement the TDM Plan (*IS/MND*, p. 185). Operating the consolidated campus for two years without an adopted TDM Plan leaves local streets unprotected.
- Unsubstantiated Bus Reliability Commitments: TRA-1 promises that ACUSD will "commit to no longer canceling school bus routes" (*IS/MND*, p. 186). However, District records reveal an ongoing severe bus driver shortage resulting in 105 route cancellations during the 2025–2026 school year alone (*Appendix D*, p. D-6).
- Day 1 TDM Commitments: To provide enforceable mitigation on Day 1, the District must commit in TRA-1 to:
  1. A mandatory 20-to-30-minute staggered bell schedule between Sutter Creek Elementary School and Amador High School.
  2. An on-campus volunteer drop-off valet loop managed by school staff to prevent Spanish Street vehicle staging.
  3. Binding administrative permit revocation rules for off-campus parking violations.

## **II. SPECIFIC QUESTIONS TO BE ANSWERED BY ACUSD**

The City of Sutter Creek has the following technical inquiries that the District is requested to answer in a revised environmental document:

#### Traffic Modeling, Driver Demographics & Modal Split

1. Updated Site-Specific High School Study: Will the District explain in detail how the traffic and queuing study (SimTraffic) was used to model the 821-student, Grades 10–12 high school population at Amador High School that resolves the methodological defects detailed in Exhibit A?
2. Student Driver & Vehicle Counts: What is the precise estimated number of licensed student drivers expected at Amador High School? How many physical student-driven vehicles will arrive on campus daily?
3. Modal Split Breakdown: What is the specific anticipated modal split for the 821 students (i.e., exact number of students traveling via District buses, personal student vehicles, parent drop-offs, walking, or transit)?
4. Will the District explain why the previous simulation of the previous project with 603 students at Amador High School can be used to accurately calculate the impact of 821 students in the current project description?

#### State Route 49 / Sutter-Ione Road Intersection Safety

4. Signalization & Infrastructure Mitigation: Given that SR 49 / Sutter-Ione Road satisfies Caltrans Peak Hour Signal Warrants in all scenarios (*Appendix D, p. D-77*) [558, 559], what specific intersection improvements will the District help fund or construct?
5. Time-of-Day Flashing Beacons & Speed Reduction: Will the District commit to co-applying for state grant funds to install safety improvements such as active time-of-day flashing warning beacons and establish a reduced 25 MPH School Zone speed limit on SR 49 near Sutter-Ione Road during morning drop-off (7:30–8:30 AM) and afternoon dismissal (2:30–3:30 PM)?

#### Pedestrian Infrastructure & Regional Funding Conflicts

6. ACTC Funding Policy & Joint Grant Partnerships: Acknowledging that ACTC regional transportation funding to cities is restricted to roadway resurfacing and cannot be used for road widening or sidewalk construction (*Appendix D, p. D-15;*), will the District execute a binding commitment to co-apply with the City for Caltrans ATP, HSIP, and Safe Routes to School grants to fund 100% of off-site pedestrian safety features at zero local general fund cost?
7. Safe Routes to School: What specific off-site pedestrian crosswalks, sidewalk extensions, or flashing beacons will be included in joint grant applications to protect students walking between Amador High School and adjacent residential neighborhoods?

#### On-Campus Parking & Administrative Enforcement

8. Parking Supply vs. Demand: How many total vehicular parking stalls exist on the Amador High School campus, how many are reserved for faculty/staff, and how many remain for student drivers ?

9. Administrative Parking Enforcement Policy: Will the District commit to incorporating municipal parking compliance into the Amador High School Student Code of Conduct and establishing an administrative permit revocation policy for students who park illegally on Oro Madre Way or Spanish Street, avoiding police overtime costs?

#### TDM Enforcement & Day 1 Commitments

10. Day 1 TDM Implementation: Will the District revise Mitigation Measure TRA-1 to ensure a fully funded TDM Plan is operational *prior* to opening the consolidated campus, rather than deferred up to two years (*IS/MND, p. 185*)?
11. Will the district provide a detailed TDM proposal showing a schedule and deliverables for TDM implementation, monitoring and modification over the initial two years?
12. Bus Driver Recruitment Commitments: Given the 105 bus route cancellations in 2025–2026 (*Appendix D, p. D-6*) , what concrete financial or administrative commitments is the District making to guarantee 100% bus route reliability on Day 1?
13. Mandatory Tiered Bell Schedule & Valet Loop: Will the District adopt a mandatory, binding 20-to-30-minute tiered bell schedule between Sutter Creek Elementary and Amador High School, and implement an on-campus drop-off valet loop managed by school staff on Day 1?

### III. FORMAL REQUEST FOR SUPPLEMENTAL CEQA REVIEW & MOU

To resolve these concerns constructively without causing financial strain, the City of Sutter Creek proposes signing a Memorandum of Understanding (MOU) before project approval. This agreement would focus on joint parking enforcement, staggered bell schedules, and co-applying for state grants for public safety.

Because the current IS/MND relies on the TDM plans, the City asks ACUSD to provide a much more detailed TDM implementation plan and commit to having the initial implementation ready on Day 1 of consolidation.

The City is available to meet with District representatives to resolve these matters collaboratively.

Sincerely,

City Manager  
City of Sutter Creek

CC: City Council, City of Sutter Creek  
Amador County Transportation Commission (ACTC)  
Caltrans District 10

**Attachments:**

Exhibit A: Technical Evaluation of Appendix D SimTraffic Queuing Model Flaws

## **EXHIBIT A:**

### **TECHNICAL EVALUATION OF APPENDIX D SIMTRAFFIC QUEUING MODEL FLAWS**

*RE: Invalidation of Environmental Findings Due to Reliance on an Outdated Middle School Traffic Baseline (CEQA Guidelines § 15064; PRC § 21080; County of Inyo v. City of Los Angeles)*

#### **1. Misrepresentation of the Baseline Project Description**

In both the body of the Initial Study / Mitigated Negative Declaration (*IS/MND*, Section XVII, p. 188) and the Transportation Technical Memorandum (*Appendix D*, p. D-39), the District attempts to justify its queuing analysis with the following statement:

*"Vehicle queuing was analyzed as part of the operational analysis prepared and submitted to ACUSD in October 2024 with the old project description, included in Appendix A. The prior study included thoroughly calibrated SimTraffic microscopic simulation, which provided robust, stochastic vehicle queue quantification by modeling driver behavior and lane changing dynamics. The results of the October 2024 analysis in combination with a slightly different project description (the proposed project) were used to estimate how vehicle queuing would be expected with the proposed project."*

Characterizing the change between the October 2024 study and the September 2026 proposed project as a "slightly different project description" is a fundamental misrepresentation of the environmental baseline:

- October 2024 Study Baseline (*Appendix D*, Table 1, p. D-43): In the 2024 study, Amador High School was evaluated as a Junior High School (Grades 7–8) serving 603 students.
- September 2026 Proposed Project (*IS/MND*, Table 1, p. 35; *Appendix D*, p. D-2): In the current proposed project, Amador High School is designated as the consolidated Countywide Senior High School (Grades 10–12) serving 821 upperclassmen.

A shift from a 603-student middle school to an 821-student senior high school represents a +36% increase in campus population over the 2024 model and a +43% increase over current campus enrollment (573 students). Replacing a middle school land use with a senior high school land use is a structural change in project baseline, not a minor modification.

#### **2. Invalidation of SimTraffic Microscopic Calibration**

SimTraffic is a microscopic simulation tool that models individual vehicle movements, gap acceptance, driver deceleration, lane-changing friction, and queue propagation based on user-calibrated behavioral parameters.

The District claims that because SimTraffic was "thoroughly calibrated" in October 2024, those outputs remain valid for the 2026 high school project. This claim is methodologically invalid because middle school driver profiles and upperclassmen high school driver profiles exhibit completely different operational behaviors:

1. Non-Driving Population (2024 Middle School Model): Junior high students (Grades 7–8, ages 12–14) cannot drive. Under the 2024 model, 100% of non-bus vehicular traffic consists of parent

drop-offs and pick-ups. Parent loading operates as a continuous, valet-style drop-off loop with rapid vehicle turnover and short dwell times.

2. Licensed Student Driver Population (2026 High School Project): Senior high students (Grades 10–12, ages 16–18) are licensed drivers.. Furthermore, because 9th graders (ages 14–15) have been relocated to Argonaut Junior High, the proportion of licensed drivers per student at Amador High School will be higher than at a standard 9–12 high school.
3. Operational Friction & On-Street Queuing: High school upperclassmen arrive in individual vehicles, search for limited on-campus or permit parking stalls, execute parallel/perpendicular parking maneuvers on surrounding municipal streets (Spanish Street, Oro Madre Way, Sutter-Ione Road), create entry/exit bottlenecks at campus parking gates, and attempt to depart en masse at the afternoon dismissal bell.

A SimTraffic model calibrated for 12- to 14-year-old parent drop-offs cannot simulate the lane-changing friction, parking search delays, and street queuing generated by hundreds of 16- to 18-year-old novice drivers. Re-using middle school simulation parameters to evaluate senior high school traffic renders the queuing conclusions scientifically meaningless.

### 3. Failure to Provide Substantial Evidence (*CEQA Guidelines § 15384*)

Under CEQA, an agency's findings must be supported by "*substantial evidence in light of the whole record*" (PRC § 21080(e)). Argument, speculation, or unverified extrapolation does not constitute substantial evidence.

- No Re-Running of the Simulation: The District explicitly admits in Appendix D that it did not re-run SimTraffic for the 821-student senior high school configuration. Instead, it made manual adjustments to trip volumes at nearby intersections and declared that the results were "*comparable to the queuing that would be expected*" .
- Omission of Dismissal Surge Modeling: High school dismissal creates an instantaneous peak vehicle discharge when the final bell rings. The IS/MND offers no microscopic simulation showing how this dismissal surge will queue at the intersections of Spanish Street / Sutter-Ione Road, Oro Madre Way / Sutter-Ione Road, or Spanish Street / Old Route 49.
- Dismissal of Traffic Hazards as "Attentive Drivers": In response to potential queuing spillover onto regional arterials, the IS/MND asserts that "*drivers are attentive when driving and obey traffic laws*" and that "*the addition of vehicles to an existing congested roadway segment or intersection does not, by itself, constitute a transportation safety hazard*". CEQA requires the lead agency to evaluate whether project-generated queuing creates physical safety hazards (such as blocking sightlines, obstructing emergency access, or backing up onto SR 49). Dismissing real-world queuing risks by assuming driver attentiveness violates CEQA's mandate to analyze physical environmental impacts.

### 4. Mandatory CEQA Remedy Required of ACUSD

To remedy this fundamental evidentiary defect, the City of Sutter Creek asks the District to take the following steps prior to re-circulating the environmental document:

1. Conduct a New Site-Specific Microscopic Traffic Simulation (SimTraffic): Re-run the SimTraffic model specifically for the 821-student, Grades 10–12 configuration at Amador High School.
2. Calibrate for High School Upperclassmen Demographics: Input actual high school driver parameters, including:
  - Empirical student driver generation rates reflecting a Grades 10–12 demographic [603].
  - Vehicle dwell times and friction factors associated with on-campus permit parking and off-campus street parking search behavior.
  - Peak afternoon dismissal discharge rates.
3. Evaluate Queue Lengths Against Storage Capacities: Disclose exact 95th-percentile queue lengths for all turn lanes and approaches at the intersections of SR 49 / Sutter-Ione Road, Spanish Street / Sutter-Ione Road, Oro Madre Way / Sutter-Ione Road, and Spanish Street / Old Route 49.
4. Identify Binding Physical Mitigation: If queues exceed available storage or back up into through-lanes or state highway corridors, formulate enforceable physical mitigation measures (e.g., turn-pocket extensions, traffic signalization, time-of-day speed controls, or mandatory staggered dismissal schedules).