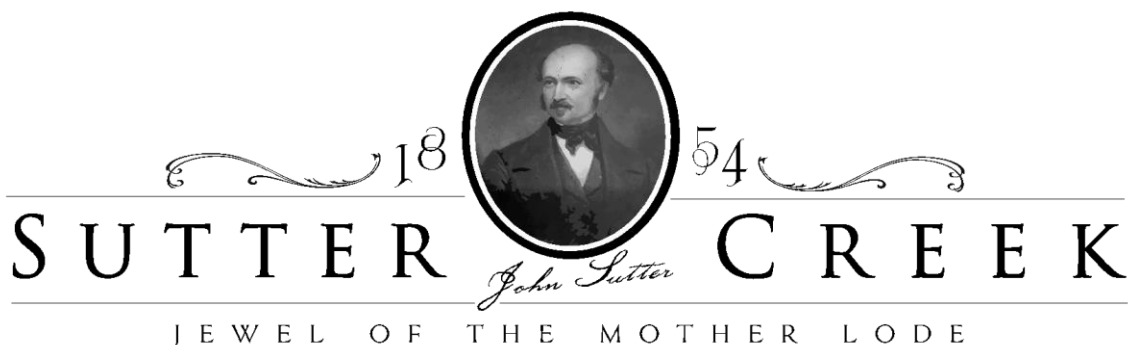




STAFF REPORT

TO: THE HONORABLE MAYOR AND MEMBERS OF THE CITY COUNCIL
MEETING DATE: SEPT 21, 2026
FROM: TOM DUBOIS, CITY MANAGER
SUBJECT: SUPPLEMENTAL REPORT AND UPDATED DRAFT LETTER

I attended the ACUSD School Board meeting on September 16 where the Mitigated Neg Dec was reviewed with the school board. The consultants from Placeworks, reviewed the environmental review work and answered a lot of questions about the traffic analysis and safety.

After the meeting, I asked the traffic engineer a bunch of questions which clarified items that were not clear in the written report. Based on having additional information, I am revising my recommendations::

UPDATED SUMMARY OF CORE CEQA DEFICIENCIES IDENTIFIED

CEQA Issue	IS/MND Flaw & Source Citation	Update
Flawed Baseline & Queuing Model	Relies on an October 2024 SimTraffic study	The assumptions on mode-share and analysis of the date was based on the current project definition. Because of how traffic simulation works, the analysis is valid
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>).	Modal splits were included in the updated calculations in the detailed tech analysis.
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	The school board directed the superintendent to propose a safety plan, separate from CEQA. Under CEQA, hazards from the project must be identified. There may be a safety argument

XVII(c), as well as a policy conflict under Section XVII(a). (*App. D p. D-77*).

to be made on the changing conditions, but a clear nexus would need to be established.

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).	KEEP - 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>).	KEEP - Require Day 1 operational TDM commitments: staggered bell schedules, drop-off valet loops, and permit rules.

The mitigation proposed is the Transportation Demand Management Plan (TDM). In the meeting, they clarified that they will implement it immediately, and measure, monitor, and modify it over the two years. The report made it sound like it would not be in place for two years. We should clarify in our letter that the initial TDM will launch on day 1, with ongoing monitoring and modifications as needed.

Parking in itself is not a CEQA issue, though the district numbers seem to show sufficient parking availability. The district remains committed to ensuring students do not park on residential streets.

CEQA does not distinguish between student drivers and experienced drivers. In terms of car traffic, the impact of student driving is less than drop-off parking. The former middle school proposal at Amador would have had parents making 4 trips, driving in and out to drop-off and pickup. Having Grades 10-12 could have less of an impact as a student driver only has 2 trips, driving in and then leaving.

While safety / hazards remain a CEQA issue, an increase of vehicles on its own is not necessarily a hazard. We would also need to demonstrate a nexus with the change in school of operations to increase hazard. Their traffic reports indicate that Sutter-Ione road is a hazard today. I believe our best course is to work with the school district to continue to evaluate the intersection as a safety issue with a commitment from them to share in a solution to safety issues for the good of our community and students. I think we should push for the MOU and an agreement to do this as proposed originally and agree to co-apply for Caltrans Active Transportation Program (ATP) and Highway Safety Improvement Program (HSIP) grants to cover 100% of capital costs for safety improvements.