



*CITY OF IONE*  
*IONE, CA 95640*

Agenda Item #D1

**DATE: JANUARY 23, 2024**

**TO: CITY COUNCIL & PLANNING COMMISSION**

**FROM: SUSAN M. PETERS, CONTRACT PLANNER**

**SUBJECT: ACUSD SCHOOL CLOSURE/CONSOLIDATION PROGRAM PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT – REVIEW WORKSHOP**

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### **WORKSHOP PURPOSE**

The purpose of tonight’s workshop is to review the Amador County Unified School District School Closure/Consolidation Program Project Draft Environmental Impact Report for adequacy and provide direction to staff for a response in accordance with the California Environmental Quality Act.

### **BACKGROUND**

On May 24, 2022, the Amador County Unified School District Board of Trustees approved a consolidation program to combine Amador and Argonaut High Schools and Ione and Jackson Jr. High Schools. They made this decision without preparing the required California Environmental Quality Act (CEQA) documentation. The purpose of CEQA is to provide decisionmakers with an analysis of impacts and potential mitigation measures so they can make an informed decision.

The Amador County Transportation Commission (ACTC) challenged ACUSD decision to approve consolidation without preparing the necessary CEQA documentation, and on May 10, 2023, the school board approved a contract with an environmental consulting firm to commence work on an Environmental Impact Report.

On June 21, 2023 ACUSD issued a Notice of Preparation to notify public agencies, members of the public and interested parties of the intent to draft an Environmental Impact Report (EIR) and solicit comments on the scope of the EIR.

The City of Ione provided a response to the Notice of Preparation (see attached July 19, 2023 letter) requesting the EIR consider the following:

- Traffic impacts, specifically during drop off and pick up of students;
- Public safety impacts including circulation, both on and off site, during emergencies, pedestrian and bus routes, and issues related to the proximity of the railroad line and industrial facility;

- Emergency response time and access to and from the site and evacuation in the event of a fire in the Wild Land Urban Interface (WUI) fire; and
- Sewer impacts including collection and treatment plant capacity.

The ACUSD released the Draft EIR on December 15, 2023 and initiated the 45 day public review period. The City of Ione, along with the cities of Sutter Creek and Jackson and the ACTC, requested that, in light of the holidays and complex nature of the DEIR, the review period be extended by 30 days. On January 17, 2024 the school board approved a 15 day extension. Comments on the Draft EIR are due February 13, 2024.

## **DISCUSSION**

Staff is reviewing the Draft EIR and is preparing a letter addressing some deficiencies in the analysis including not addressing comments made in the City’s response to the Notice of Preparation. The following is a summary of concerns:

- The project description for the improvements to the Junior High School to convert it to an elementary school is lacking information. Specifically, how some of the improvements, which appear to be on Southern Pacific Railroad property are allowed, safety features (i.e. fencing and road widening) to address concerns with emergency ingress and egress and interface with attractive nuisances (i.e. stock ponds and railroad facilities);
- The project description has no information regarding the disposition of the existing Ione Elementary School;
- The Utilities and Service System section of the Draft EIR does not describe the wastewater collection capacity and assumes that closure of the existing elementary school will decrease the overall capacity requirements to the Wastewater Treatment Plant. This assumes no reuse of the existing elementary school. Wastewater credits from the existing elementary school should not be used unless there is no intent to reuse the site;
- The Transportation section states that the project is consistent with the Ione General Plan yet the narrow roadways in the vicinity of the school site, lack of sidewalks and lack of emergency access to the south and east of the site are not considered in the safety analysis;
- The Transportation section does not address the physical impacts to the residential streets accessing the site. These streets were not designed for the amount of traffic they are already receiving and are failing as a result. Increased traffic will exacerbate the problem;
- The Transportation section lacks safety impacts associated with increased queuing at all intersections in the vicinity of the school site. An operations analysis was prepared and provided in the appendices of the DEIR, however the analysis is deficient in that it does not address key intersections including Main Street and Preston Avenue (Highway 104). Additionally this analysis was not used in the DEIR to analyze safety impacts or provide potential mitigation measures; and
- Overall, the DEIR does not demonstrate that the proposed consolidation and closure is consistent with the Amador County Unified School District Comprehensive School Safety Plan’s number one objective to “Protect the life and safety of students and staff.”

The intent of the combined Planning Commission and City Council Workshop is to review the potential deficiencies identified in this memorandum, discuss other potential discrepancies and provide staff direction for a response to ACUSD. A final comment letter will be prepared and presented to the City Council at the February 6, 2024 meeting.