

Appendix B NOP Public and Agency Comments



NATIVE AMERICAN HERITAGE COMMISSION

June 23, 2023

Jared Critchfield
Amador County Unified School District
217 Rex Ave.
Jackson, CA 95642

ACTING CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Vacant

COMMISSIONER
Vacant

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2023060568, School Closure/Consolidation Program Project, Amador County

Dear Mr. Critchfield:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines § 15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

[AB 52](#)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

California Department of Transportation

OFFICE OF THE DISTRICT 10 RURAL PLANNING
P.O. BOX 2048 | STOCKTON, CA 95201
(209) 948-7325 | FAX (209) 948-7164 TTY 711
www.dot.ca.gov



Governor's Office of Planning & Research

Jul 12 2023

STATE CLEARINGHOUSE

July 12, 2023

Torie F. Gibson, Ed.D., Superintendent
Amador County Unified School District
217 Rex Avenue
Jackson, CA 95642

**Notice of Preparation
Amador County Unified
School District
SCH 2023060568**

Dear Dr. Gibson:

Caltrans appreciates the opportunity to review and respond to the Amador County Unified School District (ACUSD) Notice of Preparation for the proposed School Consolidation project, affecting ACUSD's school campuses, including Amador High School, Sutter School, Jackson Junior High School, Lone Elementary School, Jackson Elementary School, and the Sutter Creek Elementary School.

ACUSD provides preschool through 12th grade and adult education services to Amador County. The ACUSD is considering a program to consolidate eight schools onto six campuses. Sutter Creek Primary School and Lone Elementary School will be closed for later disposition.

ACUSD proposes to combine Amador High School (HS) and Argonaut HS at Argonaut HS. This would change the enrollment capacity from 925 students to 1,325 students; the school would continue to serve grades 9 through 12. This campus would have site and building improvements to accommodate the increase in enrollment including adding a two-story 10-classroom building (with 4 science labs and 6 standard classrooms), relocate 5 portable classrooms from Jackson Junior HS and Lone Elementary School to this campus, convert 2 preschool classrooms to regular classrooms, convert a classroom for counseling office, renovate and expand the kitchen, and renovate and expand gymnasium locker rooms. The campus would have a new parent drop-off, new access road connecting to Stony Creek Road, and accessibility compliance improvements throughout the campus.

Also proposed is to combine Lone Junior HS and Jackson Junior HS at Amador HS. This change would not affect the enrollment capacity (875 students) of the campus nor the number of teaching stations (35 teaching stations). The campuses would serve grades 7 through 8 instead teaching stations (35 teaching stations).

Also proposed is to relocate Lone Elementary School to Lone Junior HS and would add preschool and transitional kindergarten (TK), and grades 1 through 5, to the campus. This would change the enrollment capacity of the campus from 775 students serving grades 6 through 8 to 801 students serving preschool and grades TK through 6. This campus would also have site and building improvements to accommodate the increase in enrollment including adding 2 new classroom buildings and playground for preschool, TK, and Extending Learning; convert science labs to kindergarten classrooms; and convert restrooms to kindergarten restrooms. Also planned is expanding the parent drop-off/pick-up areas, the kindergarten drop-off area, the kitchen, and construct a new play structure and hardcourt areas.

Jackson Junior HS would be converted into the County Preschool Center. This would change the enrollment capacity and grade levels from 475 students in grades 6 through 8 to 195 preschool and transitional kindergarten students. The number of teaching stations would decrease from 19 to 15. Restrooms and fountains would be converted to age-appropriate fixtures.

ASUCD would add 6th grade to Jackson Elementary School. The enrollment capacity of 575 students and 23 teaching stations would remain the same.

Expansion is planned for Sutter Creek Elementary School to create a TK through 6th grade campus. This would increase the enrollment capacity from 325 students in grades TK through 2 to 625 students in grades TK through 6. To accommodate the increase in students, a new classroom building with 12 classrooms and a lunch shelter would be constructed.

The project areas include Amador City, Lone, Jackson, Plymouth, Sutter Creek, and unincorporated regions within the County.

Caltrans at this time has the following comments:

Environmental

If any construction-related activities encroach into Caltrans Right of Way (ROW), the project proponent must apply for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. All California Environmental Quality Act (CEQA) documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies will analyze potential impacts to any cultural sites, historic properties, biological resources, hazardous waste locations, scenic highways, and/or other environmental resources within Caltrans ROW at the project site(s).

Hydrology

We request to review the pre- and post-construction runoff calculations and drainage plans to understand flow patterns. Once drainage plans and calculations are submitted for Argonaut High School, Lone Jr. High School, and Sutter Creek Elementary School improvements, additional review will be done.

Traffic Operations

Senate Bill 743 is changing the California Environmental Quality Act (CEQA) analysis of transportation impacts. It requires local land use projects to provide a safe transportation system, reduce per capita Vehicle Miles Traveled (VMT), increase accessibility by mode share of bicycle, pedestrian, and transit travel, and reduce greenhouse gas (GHG) emissions. VMT reduction is necessary to meet the statewide GHG. Caltrans recommends VMT per capital thresholds are 15% below existing regional VMT per capita. A Traffic Impact Study (TIS) will need to include VMT analysis (including induced travel demand) to determine the significance of those impacts and identify potential mitigation measures. Caltrans also recommends the establishment of programs or methods to reduce VMT and support appropriate bicycle, pedestrian, and transit infrastructure.

This project may significantly change traffic patterns. Thus, a VMT study will be required for CEQA analysis. The VMT study should include VMT mitigation measures. Some possible VMT mitigation measures include school buses, shuttle buses, transit bus programs, and bike & pedestrian facility improvement that promotes walking & biking to school.

- In addition to the VMT analysis, the proposed project needs to conduct the queue analysis at the intersections of State Route (SR) 49/Hoffman St, SR 49/Sutter St, and SR 88/Argonaut Lane to analyze the potential safety impacts of the project, as it may significantly change the traffic patterns. The queue analysis will determine if any left-turn/right-turn storages at these intersections can accommodate additional traffic generated from the proposed project.
- The queue analysis, at minimum, needs to provide the following:
 - Existing turning movement traffic count, including pedestrians/students (AM & PM peaks)
 - Trip generation and trip distribution of the proposed project, including the estimation of the number of students who will use crosswalks at SR 49/Hoffman St, SR 49/Sutter St, and SR 88/Argonaut Lane
 - Synchro/SimTraffic analysis


Caltrans suggest Amador County and ACUSD continue to coordinate and consult with Caltrans to identify and address potential cumulative transportation impacts that may occur from this project and other developments near this location. This will assist Caltrans in ensuring that traffic safety and quality standards are maintained for the traveling public on existing and future state transportation facilities.

Encroachment Permits

If any future project activities encroach into Caltrans ROW, the project proponent must submit an application for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. Appropriate environmental studies must be submitted with this application. These studies will include an analysis of potential impacts to any cultural sites, biological resources, hazardous waste locations, and/or other resources within Caltrans ROW at the project site(s). For more information, please visit the Caltrans Website at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>

If you have any question or would like to discuss these comments, please contact Paul Bauldry at (209) 670-9488 (email: paul.bauldry@dot.ca.gov) or me at (209) 483-7234 (email: Gregoria.Ponce@dot.ca.gov).

Sincerely,



Gregoria Ponce', Chief
Office of Rural Planning

c: Chuck Beatty, Director, Amador County Planning Department
State Clearinghouse

Central Valley Regional Water Quality Control Board

14 July 2023

Jared Critchfield
Amador County Unified School District
217 Rex Avenue
Jackson, CA 95642
jcritchfield@acusd.org

Governor's Office of Planning & Research

Jul 17 2023

STATE CLEARINGHOUSE

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, SCHOOL CLOSURE/ CONSOLIDATION PROGRAM PROJECT, SCH#2023060568, AMADOR COUNTY

Pursuant to the State Clearinghouse's 21 June 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the School Closure/Consolidation Program Project, located in Amador County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

School Closure/Consolidation
Program Project
Amador County

- 5 -

14 July 2023

If you have questions regarding these comments, please contact me at (916) 464-4684
or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



July 18, 2023

Jared Critchfield
Amador County Unified School District
217 Rex Ave
Jackson, CA 95642
jcritchfield@acusd.org

Subject: School Closure/Consolidation Program Project - DRAFT ENVIRONMENTAL
IMPACT REPORT (DEIR)
SCH# 2023060568

Dear Jared Critchfield:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of an Environmental Impact Report (EIR) from Amador County Unified School District (ACUSD) for the School Closure/Consolidation Program Project (Project) in Amador County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

School Closure/Consolidation Program Project

Page 2 of 13

review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located within multiple cities and unincorporated county within Amador County. Approximate locations include but are not limited to Latitude: 38.395007 and Longitude: -120.801066, Latitude: 38.349872 and Longitude: -120.931149, Latitude: 38.398178 and Longitude: -120.810744, Latitude: 38.355873 and Longitude: -120.791500, Latitude: 38.348877 and Longitude: -120.935050, and Latitude: 38.352764 and Longitude: -120.778695.

The Project consists of the consolidation of eight (8) schools onto six (6) campuses within the Amador County Unified School District (ACUSD). Sutter Creek Primary School and Lone Elementary School will be closed for later disposition. ACUSD proposes to combine Amador High School (HS) and Argonaut HS at Argonaut HS, combine Lone Junior HS and Jackson Junior HS at Amador HS, relocate Lone Elementary School to Lone Junior HS, convert Jackson Junior HS into the County Preschool Center, add 6th grade to Jackson Elementary School, and expand Sutter Creek Elementary School campus.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist the ACUSD in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming EIR address the following:

Project Description

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils

School Closure/Consolidation Program Project

Page 3 of 13

areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

As required by § 15126.6 of the CEQA Guidelines, the EIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the EIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the EIR specifically include:

1. An assessment of all habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition (Sawyer 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the Department webpage www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a

School Closure/Consolidation Program Project

Page 4 of 13

starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

3. A complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. The EIR should include the results of focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Species-specific surveys should be conducted in order to ascertain the presence of species with the potential to be directly, indirectly, on or within a reasonable distance of the Project activities. CDFW recommends the ACUSD rely on survey and monitoring protocols and guidelines available at: www.wildlife.ca.gov/Conservation/Survey-Protocols. Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.
4. A thorough, recent (within the last two years), floristic-based assessment of special-status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see www.wildlife.ca.gov/Conservation/Plants).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The EIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on

School Closure/Consolidation Program Project

Page 5 of 13

biological resources are fully analyzed, the following information should be included in the EIR:

1. The EIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The EIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and discussed, and it must permit the significant effects of the Project to be considered in the full environmental context.
2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The EIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project destination of runoff from the Project site.
3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The EIR should discuss the Project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The EIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-status species, open space, and adjacent natural habitats in the cumulative effects analysis.

Mitigation Measures for Project Impacts to Biological Resources

The EIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. CDFW also recommends the environmental documentation provide

School Closure/Consolidation Program Project

Page 6 of 13

scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western pond turtle (*Emys marmorata*) and Townsend's big-eared bat (*Corynorhinus townsendii*). Project activities described in the EIR should be designed to avoid any SSC that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the EIR fully analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends the ACUSD include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.
2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The EIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
3. *Native Wildlife Nursery Sites*: CDFW recommends the EIR fully analyze potential adverse impacts to native wildlife nursery sites, including but not limited to bat maternity roosts. Based on review of Project materials, aerial photography, and observation of the site from public roadways, the Project sites contain potential nursery site habitat for structure and tree roosting bats and is near potential foraging habitat. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). CDFW recommends that the EIR fully identify the Project's potential impacts to native wildlife nursery sites, and include appropriate avoidance, minimization, and mitigation measures to reduce impacts or mitigate any potential significant impacts to bat nursery sites.
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the EIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration,

School Closure/Consolidation Program Project

Page 7 of 13

enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The EIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by individuals with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at www.wildlife.ca.gov/Licensing/Scientific-Collecting#53949678-regulations.

School Closure/Consolidation Program Project

Page 8 of 13

6. *Nesting Birds*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within, and adjacent to, the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the EIR.

CDFW recommends the EIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The EIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

7. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the ACUSD should state in the EIR a requirement for a qualified biologist with the proper handling permits, will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the EIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The EIR should also describe qualified biologist

School Closure/Consolidation Program Project

Page 9 of 13

qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.

8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the EIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

The EIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the EIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(b) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring mitigation in this way, the EIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (Fish & G. Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project.

State-listed species with the potential to occur in the area include, but are not limited to: Tricolored Blackbird (*Agelaius tricolor*) and foothill yellow-legged frog (*Rana boylei*).

The EIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, if applicable, CDFW recommends the EIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and

School Closure/Consolidation Program Project

Page 10 of 13

Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

The EIR should identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the EIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste, or other materials where it may pass into any river, stream or lake.
4. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of

School Closure/Consolidation Program Project

Page 11 of 13

an LSA Agreement, if one is necessary, the EIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. Notifications for projects involving (1) sand, gravel or rock extraction, (2) timber harvesting operations, or (3) routine maintenance operations must be submitted using paper notification forms. All other LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.
2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography and observation of the site from public roadways, the Project sites appear to support unnamed, seasonal drainages, and unnamed tributaries to Sutter Creek. CDFW recommends the EIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

School Closure/Consolidation Program Project
Page 12 of 13

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

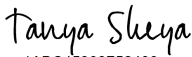
CONCLUSION

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670.

CDFW appreciates the opportunity to comment on the Notice of Preparation of the EIR for the School Closure/Consolidation Program Project and recommends that the ACUSD address CDFW's comments and concerns in the forthcoming EIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact Zach Kearns, Environmental Scientist at (916) 358-1134 or zachary.kearns@wildlife.ca.gov.

Sincerely,

DocuSigned by:

1ABC45303752499...

Tanya Sheya
Environmental Program Manager

School Closure/Consolidation Program Project
Page 13 of 13

ec: Billie Wilson, Senior Environmental Scientist (Supervisory)
Zach Kearns, Environmental Scientist
Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

Literature Cited

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California.
<http://vegetation.cnps.org/>



CARISSA BEECHAM
cbeecham@kmtg.com

July 12, 2023

ACUSD Office
Attn: Jared Critchfield
217 Rex Avenue
Jackson, CA 95642
CEQAcomments@acUSD.org

Re: Response to Notice of Preparation- School Closure/Consolidation Program Project

Dear Mr. Critchfield:

This is in response to the **Notice of Preparation for the School Closure/Consolidation Program Project** ("Project") issued by the District as Lead Agency under the California Environmental Quality Act ("CEQA"). As you are aware, the Amador County Transportation Commission ("ACTC") is the Regional Transportation Planning Agency and Local Transportation Commission to Amador County. ACTC's mission includes the protection and advancement of local, regional, and state travel to the benefit of County citizens, visitors, and guests. In this vein, it is ACTC's responsibility to advocate for smart planning that is a catalyst for fluid, unimpeded traffic in the present and future.

ACTC is pleased that the District will be preparing an environmental impact report ("EIR") for the Project. ACTC has previously expressed the need for the District to fully study, identify, and mitigate the potential traffic impacts of the Project and repeats those concerns here.

To assist in your review, and as a responsible agency for purposes of CEQA, ACTC has identified the following impacts and potential mitigation measures, which should be considered in the EIR. A necessary traffic study will likely identify additional impacts and new and different mitigation measures and this list is not exhaustive.

Impacts:

- Traffic impacts will include increased congestion during drop off and pick up, which increase air pollution from idling and reroute other traffic to longer, alternative routes, increasing vehicles miles traveled (VMT).
- Public safety impacts are likely to result from increasing the number of students in a single location.
- Traffic impacts to numerous local roads and intersections as well as regional and state highways and intersections from increased student enrollment, extracurricular activities, and related uses at consolidated schools. Students presently walking to schools will now be forced to travel by car.

- Impacts to pedestrian routes for students in the interplay with safe streets.

Potential Mitigation:

- An expanded and extended drop-off area, which separates individual drop offs from busses.
- Automated gates.
- An internal circulation plan that contemplates emergency circumstances.
- Fair-share contributions towards off-site roadway improvements.

Please continue to keep us informed as the EIR is developed. ACTC looks forward to working with the District to ensure that traffic impacts are adequately studied and reasonable and effective mitigation measures are implemented to reduce any impacts from the Project to less than significant.

Very truly yours,

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation



CARISSA BEECHAM

CB





AMADOR COUNTY COMMUNITY DEVELOPMENT AGENCY
TRANSPORTATION & PUBLIC WORKS

PHONE: (209) 223-6429

FAX: (209) 223-6395

WEBSITE: www.amadorgov.org

EMAIL: PublicWorks@amadorgov.org

COUNTY ADMINISTRATION CENTER • 810 COURT STREET • JACKSON, CA 95642-2132

July 11, 2023

Amador County Unified School District
217 Rex Avenue
Jackson, CA 95642

Attn: Jared Critchfield, Deputy Superintendent, Business Service

Re: Response to the Amador County Unified School District Notice of Preparation for an Environmental Impact Report (EIR) for the School Closure/Consolidation Program Project

Dear Mr. Critchfield,

The Amador County Unified School District (ACUSD) will prepare an environmental impact report (EIR) for its project entitled the School Closure/Consolidation Program Project (Project) pursuant to applicable California Environmental Quality Act (CEQA) requirements. Amador County Department of Transportation and Public Works (Department) staff has received the Notice of Preparation (NOP) for this action. The Department is pleased that ACUSD will be preparing an Environmental Impact Report (EIR) for the Project.

All of the campuses affected by this project are located within the corporate limits of either Lone, Jackson or Sutter Creek. However, the primary concern of the Department is the consolidation of Amador and Argonaut High Schools at Argonaut High School. Vehicular access to Argonaut High School is achieved through Hoffman Street, Argonaut Lane and Stony Creek Road. While the proposed consolidation will most likely have minimal impact on traffic volumes on Hoffman Street and Stony Creek Road, it is envisioned that the consolidation will have a significant impact on traffic volume on Argonaut Lane. Argonaut Lane is a County road from the SR 49/88 intersection to the Jackson City Limit, a distance of approximately 0.317 miles, or 1,674 feet. Argonaut Lane is a two lane collector with minimal shoulder width.

According to the NOP, the enrollment at the Argonaut campus will increase from the current enrollment of 536 students to a proposed enrollment of 1,263 students, an increase of 737 students. It is reasonable to assume that nearly all of the 737 students from Amador High School will access the Argonaut campus via Argonaut Lane. Assuming 268 students, or one-half of the existing student population at Argonaut High School, currently access the campus via Argonaut Lane (a conservative estimate), the addition of 727 students represents a 371.29% increase. This will result in a significant increase in traffic volume on Argonaut Lane in the 7:30 to 8:30 am time period as well as the 3:00 to 4:00 pm time period. The morning time period is of particular concern as it coincides with the morning commute. This will undoubtedly result in a straining of the capacity of Argonaut Lane as well as increased congestion at the SR 49/88 Argonaut Lane intersection.

In addition to regular school activity traffic, special event/extracurricular activities and other social activities occurring at the Argonaut campus have the potential to generate heavy traffic volumes as these events are attended by those transported by personal vehicles as opposed to regular school activities where a large portion of attendees are transported by bus.

July 11, 2023

Page 2 of 2

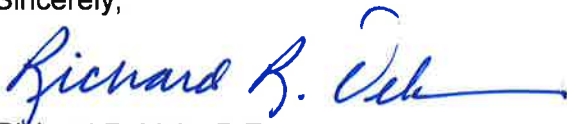
The Department respectfully requests a comprehensive traffic study be conducted as part of the EIR to identify the traffic and safety impacts of the proposed high school consolidation and recommend feasible mitigation measures for these impacts. The Department also requests the extension of Wicklow Way to Stony Creek Road be strongly studied as both an impact mitigation as well as an opportunity to serve the Argonaut campus with a well-planned and designed access point for student drop off by bus as well as by parents at the west side of the campus. A Wicklow Way extension would also provide relief to the current school traffic on Argonaut Lane as students transported to and from the lone area would use Wicklow Lane instead of Argonaut Lane.

The Department and Amador County look forward to working with ACUSD to insure traffic impacts are thoroughly studied and reasonable mitigation measures are implemented to reduce traffic impacts to below significant due to the proposed Project.

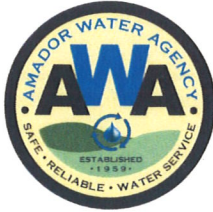
If you have any questions, please feel free to contact me.

Thank you.

Sincerely,



Richard R. Vela, P.E.
Director of Transportation and Public Works
County of Amador



July 17, 2023

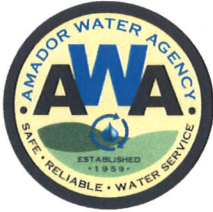
ACUSD Office
Attn: Jared Critchfield
217 Rex Avenue
Jackson, CA 95642
Email: CEQAcomments@acusd.org

Re: Amador County Unified School District,
School Closure/Consolidation Program Project

Mr. Critchfield:

The Amador Water Agency (Agency) appreciates the opportunity to comment on the notice of preparation of an Environmental Impact Report (EIR) for the Amador County Unified School District's - School Closure/Consolidation Program Project (Project). AWA did not receive the notice directly and would appreciate receiving future notices for the Project. The Project is planned to be within the AWA operated Lone Water System and Tanner Water System (System) for both retail and wholesale water service. Below are AWA's preliminary comments in regards to the EIR notice of preparation for the proposed Project.

- 1) The Agency Water Code requires all significantly modified Projects and connections for water service within the Agency's retail and wholesale service areas to apply for such service, comply with the Agency Water Code, obtain Conditional Will Serves prior to project approval, obtain a Will Serve prior to major changes in service being provided, and pay water capacity fees prior to service initiation where applicable, among other requirements. The requirements of the Agency Water Code would be required of the ACUSD and the Project.
- 2) The current storage and water treatment capacity of the Tanner Water Treatment Plant and Lone Water Treatment Plant are severely constrained. An expansion of the water treatment plants and installation of additional potable water storage may be necessary to meet the additional demands of the proposed Project and other potential development projects, within each water service area. AWA is currently developing plans to expand the existing WTPs or to construct a new WTP. Modified water service to each individual site may be contingent upon one of these options being implemented with sufficient capacity to serve the Project in each respective service area. Support of AWA's efforts to expand treatment capacity by important local partners like ACUSD will be vital.




- 3) The proposed Project plans to significantly increase water use at some school sites and significantly decrease water use at other sites. As water capacity is not transferable between properties per the Agency's regulations, any consideration of an exception would require Board action. Each site will need to be evaluated for water capacity, being mainly service line sizes, water meter sizes, distribution pipeline capacity, water storage capacity and water treatment plant capacity, in addition to any fire service or fire hydrant requirements. Improvements to water infrastructure and payment of additional capacity fees may be required. New Will Serve commitments (from AWA, and from the retail service provider if not AWA) are a condition of modified service at these sites, especially at the Argonaut High School (wholesale service), Lone Jr. High School (retail service), and Sutter Creek Elementary School (retail service) sites.
- 4) Impacts to water infrastructure and water use at sites proposed to be reduced in capacity or removed from service will need to be included in the evaluation, including foreseeable future use of those sites by ACUSD or others. Site improvements to sites to be abandoned, modified, or significantly reduced in use, especially at the current Lone Elementary School and Sutter Creek Primary School sites, may be required in order to properly abandon, modify or reuse these sites. New Will Serve commitments are a condition of modified service at these sites.
- 5) Agency regulations require certain water use efficiency measures, including separately metering landscaping greater than 5,000 square feet, and consideration of whether recycled water use is feasible. In addition, forthcoming water use efficiency regulations from the State Water Resources Control Board may require further water use reductions. These considerations may reduce the impacts of the Project.

This letter is not a commitment of service and in no way guarantees water service for this Project. Additional requirements for service may be identified at the time the Project applies for and AWA issues a Conditional Will Serve letter for each site within the Project.

AWA looks forward to working with the District to ensure that all water modifications and impacts are adequately reviewed, and reasonable measures are implemented to reduce any impacts from the Project to the community. Please feel free to call me directly at (209) 257-5245 with any questions.

Sincerely,


Larry B. McKenney,
General Manager

Enclosures: Development Service Request
CC: Amador County, City of Jackson, City of Sutter Creek, City of Lone



AMADOR COUNTY OFFICE OF EDUCATION
AMADOR COUNTY UNIFIED SCHOOL DISTRICT

Jared Critchfield, Deputy Superintendent
(209) 257-5345 | Fax (209) 223-1733 | jcritchfield@acusd.org
217 Rex Avenue, Jackson, CA 95642 | www.amadorcoe.org

NOTICE OF PREPARATION

SCHOOL CLOSURE/CONSOLIDATION PROGRAM PROJECT

Lead Agency: Amador County Unified School District

Project Applicant: Amador County Unified School District

Notice of Preparation Review Period: Wednesday, June 21, 2023 to Thursday, July 20, 2023

Notice is hereby given that the Amador County Unified School District (ACUSD), as Lead Agency under the California Environmental Quality Act (CEQA), will prepare an environmental impact report (EIR) for the School Closure/Consolidation Program (proposed project) pursuant to the California Public Resources Code, Division 13, Section 21000 et seq. (CEQA Statute), and the California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq. (CEQA Guidelines).

The purpose of this Notice of Preparation (NOP) is to (1) serve as a public notice pursuant to CEQA Guidelines Section 15082 that an EIR will be prepared and (2) advise and solicit comments and suggestions regarding the scope and content of the EIR to be prepared. ACUSD is seeking your input regarding the scope and content of the EIR, including input on potentially significant environmental effects, mitigation measures, or project alternatives that should be explored in the EIR. If you represent a public agency, ACUSD seeks input as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project.

Due to time limits mandated by State law, public agencies, members of the public, or any other interested parties are requested to respond to this NOP in writing no later than 30 days from the date of this NOP. ACUSD will accept written comments regarding this NOP through the close of business on **Thursday, July 20, 2023**. Please send all written comments, including emailed comments, to Jared Critchfield at the address below.

Project Location: The proposed project is in Amador County Unified School District and would affect eight of the ACUSD's school campuses, listed below. Campuses not on the list would not be affected by the proposed project.

- Amador High School (330 Spanish Street, Sutter Creek, California 95685)
- Argonaut High School (501 Argonaut Lane, Jackson, California 95642)
- Lone Junior High School (450 S. Mill Street, Lone, California 95640)
- Jackson Junior High School (747 Sutter Street, Jackson, California 95642)
- Lone Elementary School (415 S. Lone Street, Lone, California 95640)
- Jackson Elementary School (220 Church Street, Jackson, California 95642)
- Sutter Creek Elementary School (340 Spanish Street, Sutter Creek, California 95685, and 110 Broad Street, Sutter Creek, California 95685)

The proposed project would add a new County Preschool Center. No other schools or campuses within the ACUSD would be affected. See Figure 1, *Location Map and Existing Conditions*.

Project Description: ACUSD provides preschool through 12th grade and adult education services to Amador County. ACUSD is considering a program to consolidate eight schools onto six campuses. Tables 1 through 6 summarize the changes proposed in grade levels, student enrollment, and student capacities at the six remaining campuses. Proposed building and site improvements are also identified. Sutter Creek Primary School (at 110 Board Street in the city of Sutter Creek) and Lone Elementary School will be closed for later disposition. See Figure 2, *Proposed School Closure/Consolidation Program*.

Table 1. Argonaut High School

Proposed Action: Amador and Argonaut High Schools Combine at Argonaut High School

	Existing	Proposed
Enrollment	536 students Grades 9–12	1,263 students Grades 9–12
Capacity	925 students Grades 9–12	1,325 students Grades 9–12
Teaching Stations	37	53
Building Improvements		New 10-classroom, 2-story building (with 4 science labs and 6 standard classrooms), Addition of 5 portable classrooms relocated from Jackson Jr. High School and Lone Elementary. Convert 2 preschool classrooms to regular classrooms. Convert classroom for counseling office. Kitchen renovation and expansion. Renovate and expand gymnasium locker rooms.
Site Improvements		New parent drop-off. New access road connecting to Stony Creek Road. Accessibility compliance throughout campus. (See Figure 3, <i>Argonaut High School Site Improvements</i>)

Table 2. Amador High School

Proposed Action: Lone and Jackson Jr. High Schools Combine at Amador High School

	Existing	Proposed
Enrollment	702 students Grades 9–12	603 students Grades 7–8
Capacity	875 students Grades 9–12	875 students Grades 7–8
Teaching Stations	35	35

**Table 3. Lone Junior High School
Proposed Action: Lone Elementary School Moves to Lone Jr. High School, Accommodates
Preschool and Transitional Kindergarten to Sixth-Grade Students**

	Existing	Proposed
Enrollment	393 students Grades 6–8	649 students Preschool, grades TK–6
Capacity	775 students Grades 6–8	801 students Preschool, grades TK–6
Teaching Stations	31	31
Site Improvements		New 2-classroom building and playground for preschool, TK, and Extended Learning. Expanded parent drop-off/pick-up areas. Expanded kindergarten drop-off/pick-up areas. Convert science labs into K classrooms. Convert restrooms to K restrooms. New play structure and hardcourt areas. Kitchen expansion. (See Figure 4, <i>Lone Elementary School at Lone Junior High School Site Improvements</i>)

**Table 4. Jackson Junior High School
Proposed Action: Jackson Jr. High Becomes County Preschool Center**

	Existing	Proposed
Enrollment	346 students Grades 6–8	41 students Preschool
Capacity	475 students Grades 6–8	195 students Preschool, TK grades
Teaching Stations	19	15
Site Improvements		Convert restrooms and fountains to age-appropriate fixtures.

**Table 5. Jackson Elementary School
Proposed Action: Jackson Elementary School Adds Back Sixth-Grade Students**

	Existing	Proposed
Enrollment	500 students Grades TK–5	528 students Grades TK–6
Capacity	575 students Grades TK–5	575 students Grades TK–6
Teaching Stations	23	23

**Table 6. Sutter Creek Elementary School
 Proposed Action: Sutter Creek Elementary School Expands to Create Transitional
 Kindergarten to Sixth-Grade Campus**

	Existing	Proposed
Enrollment	204 students Grades TK–2	388 students Grades TK–6
Capacity	325 students Grades TK–2	625 students Grades TK–6
Teaching Stations	13	25
Site Improvements		New 12-classroom building, including a lunch shelter. (See Figure 5, <i>Sutter Creek Elementary School Site Improvements</i>)

Potential Environmental Effects: ACUSD will prepare an EIR that evaluates all potentially significant environmental impacts associated with the implementation of the proposed project. The EIR will explain the potentially significant effects of the proposed project as well as the reasons that other effects are not potentially significant. An initial study is not required to determine that an EIR will be prepared, and an initial study was not prepared for the proposed project.

In accordance with Section 15082 of the CEQA Guidelines, ACUSD has prepared this NOP to provide agencies, organizations, and interested parties with information describing the proposed project and its potential environmental effects. Consistent with Appendix G of the CEQA Guidelines, the 20 environmental topics that may be analyzed in an EIR are:

- | | | |
|----------------------------------|-------------------------------|-----------------------------|
| Aesthetics | Greenhouse Gas Emissions | Public Services |
| Agriculture & Forestry Resources | Hazards & Hazardous Materials | Recreation |
| Air Quality | Hydrology & Water Quality | Transportation |
| Biological Resources | Land Use & Planning | Tribal Cultural Resources |
| Cultural Resources | Mineral Resources | Utilities & Service Systems |
| Energy | Noise | Wildfire |
| Geology & Soils | Population & Housing | |

ACUSD has determined that the proposed project could potentially affect 18 of the 20 environmental topic areas identified in Appendix G. These 18 topical areas are aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. These impacts will be analyzed in detail in the EIR. The EIR will also address mandatory findings of significance. The EIR will address the short- and long-term effects of the proposed project on the environment. Feasible mitigation measures will be proposed for impacts that are determined to be potentially significant, and reasonable alternatives will be considered. A mitigation monitoring program will also be developed for any mitigation measures required by ACUSD. The proposed project is expected to have no impact on agriculture and forestry resources and mineral resources, and therefore the EIR will not present a detailed analysis of the project’s impact on these topic areas.

NOTICE OF PREPARATION

School Closure/Consolidation Program Project, Amador County Unified School District
June 21, 2023

Document Availability: The 30-day public review period for the NOP is from **Wednesday, June 21, 2023**, to **Thursday, July 20, 2023**. In accordance with the time limits mandated by State law, if there are any concerns about the scope and content of the information to be addressed in the EIR, written comments may be submitted via email or by mail to the addresses below. All written comments should be submitted at the earliest possible date but must be submitted no later than close of business **Thursday, July 20, 2023**. Public agencies should identify the contact person for the agency in the written comments.

Public Comments: Please submit your comments to:

- **Mailing Address:**
ACUSD Office
Attn: Jared Critchfield
217 Rex Avenue
Jackson, CA 95642
- **Email Address:** CEQAcomments@acusd.org

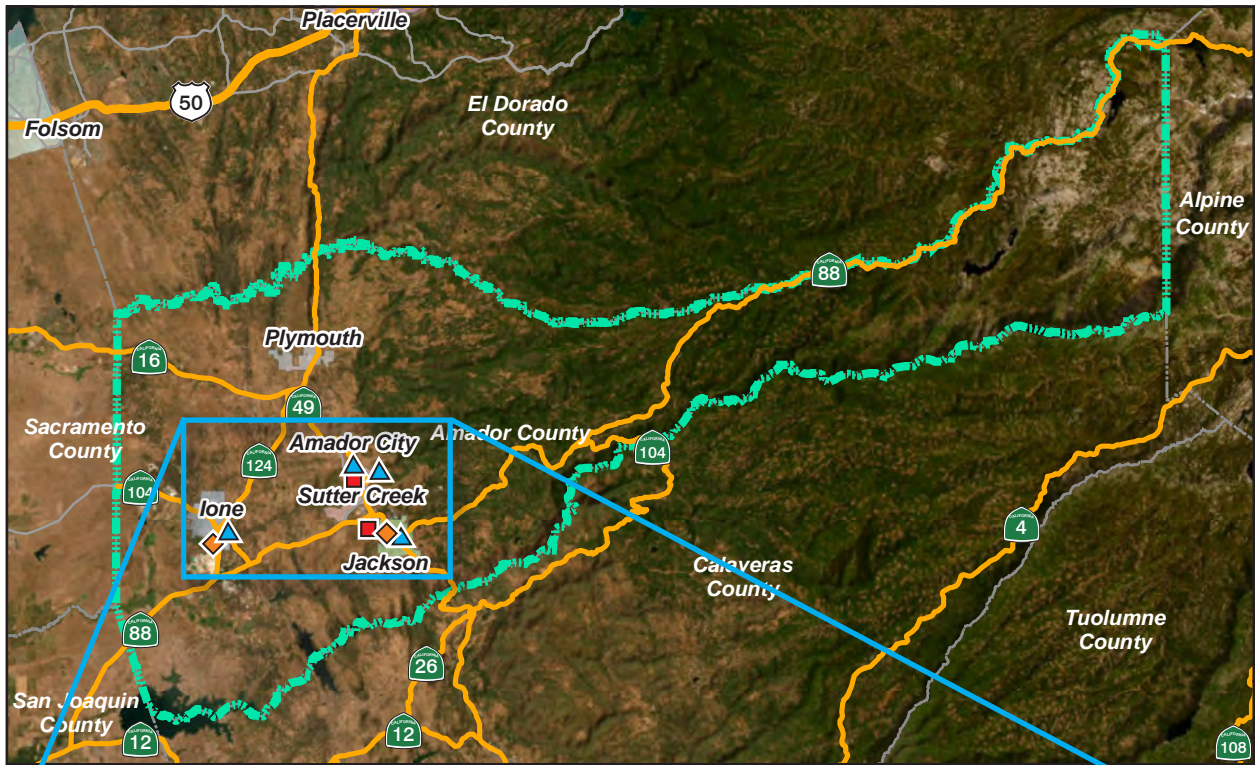
More Information: Questions concerning the matter should be directed to Jared Critchfield, Deputy Superintendent, Business Services, at 209-257-5345 or CEQAcomments@acusd.org.



Jared Critchfield, Deputy Superintendent, Business Services

6/21/23
Date

Figure 1 - Location Map and Existing Conditions



----- Amador County Unified School District
 _____ County Boundary

■ High School
 ◆ Junior High School
 ▲ Elementary School

0 3
 Scale (Miles)

Note: District schools not included on the maps will have no change.

Source: Generated using ArcMap 2023.

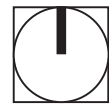
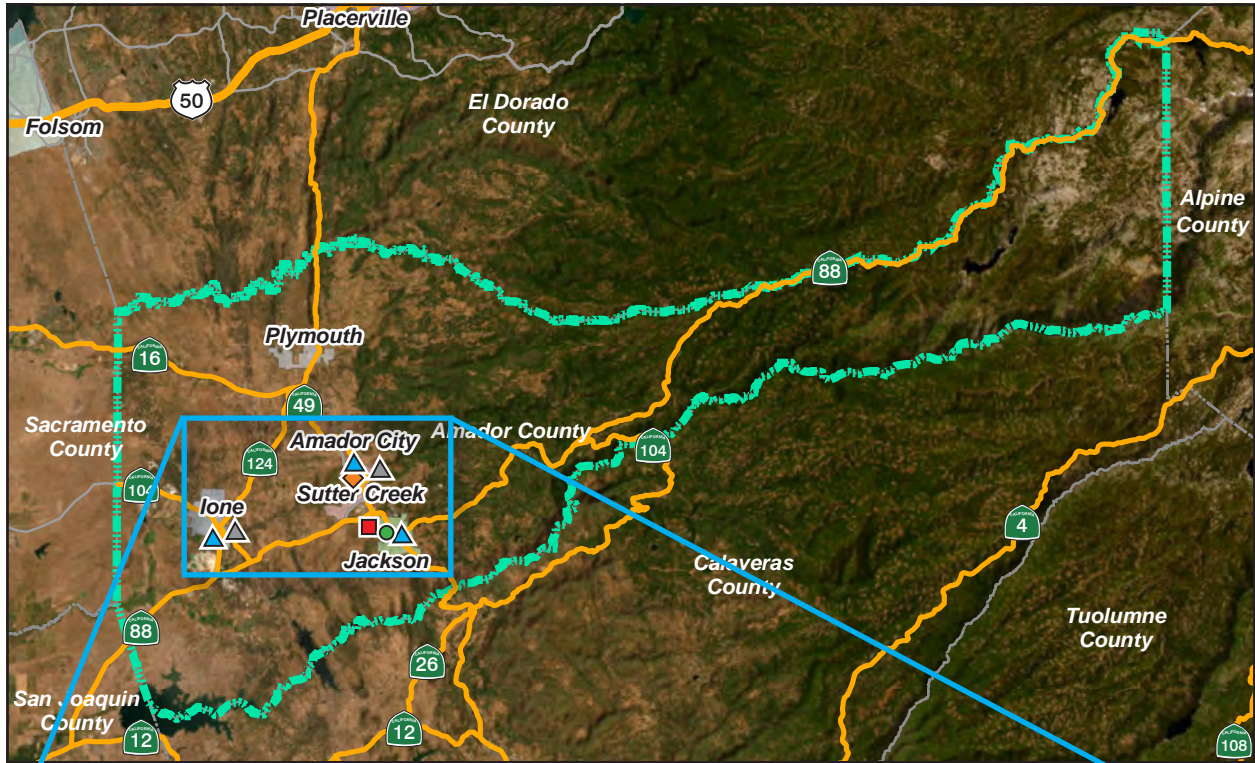


Figure 2 - Proposed School Closure/Consolidation Program



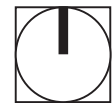
0 10
 Scale (Miles)



Amador County Unified School District
 County Boundary

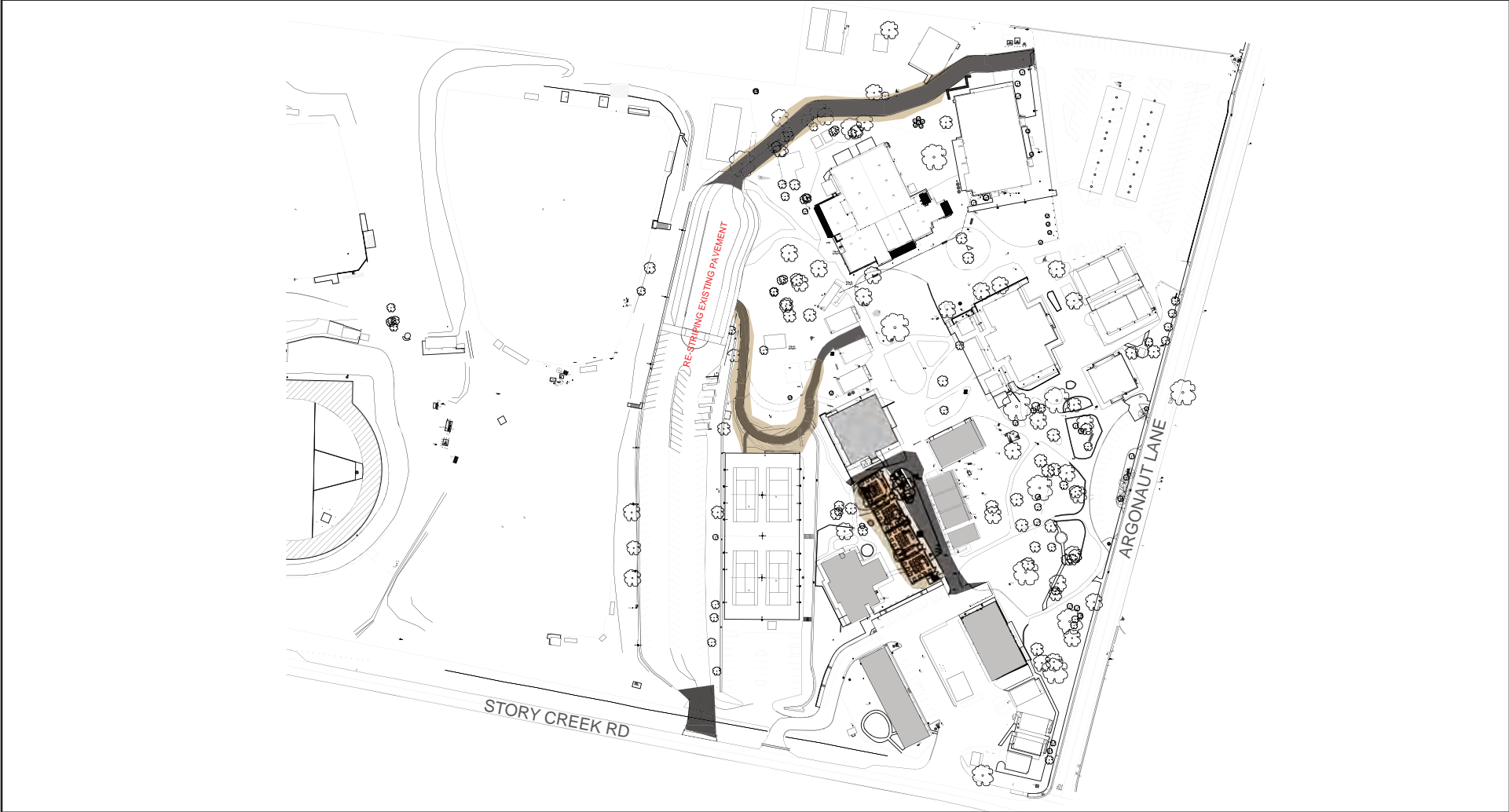
High School
 Junior High School
 Elementary School
 Preschool
 Closed Campus

0 3
 Scale (Miles)



Note: District schools not included on the maps will have no change.
 Source: Generated using ArcMap 2023.

Figure 3 - Argonaut High School Site Improvements



 New Asphalt Pavement  New Grading  New Building

0  130
Scale (Feet)



Source: California Design West Architects 2023.

Figure 4 - Lone Junior High School Site Improvements

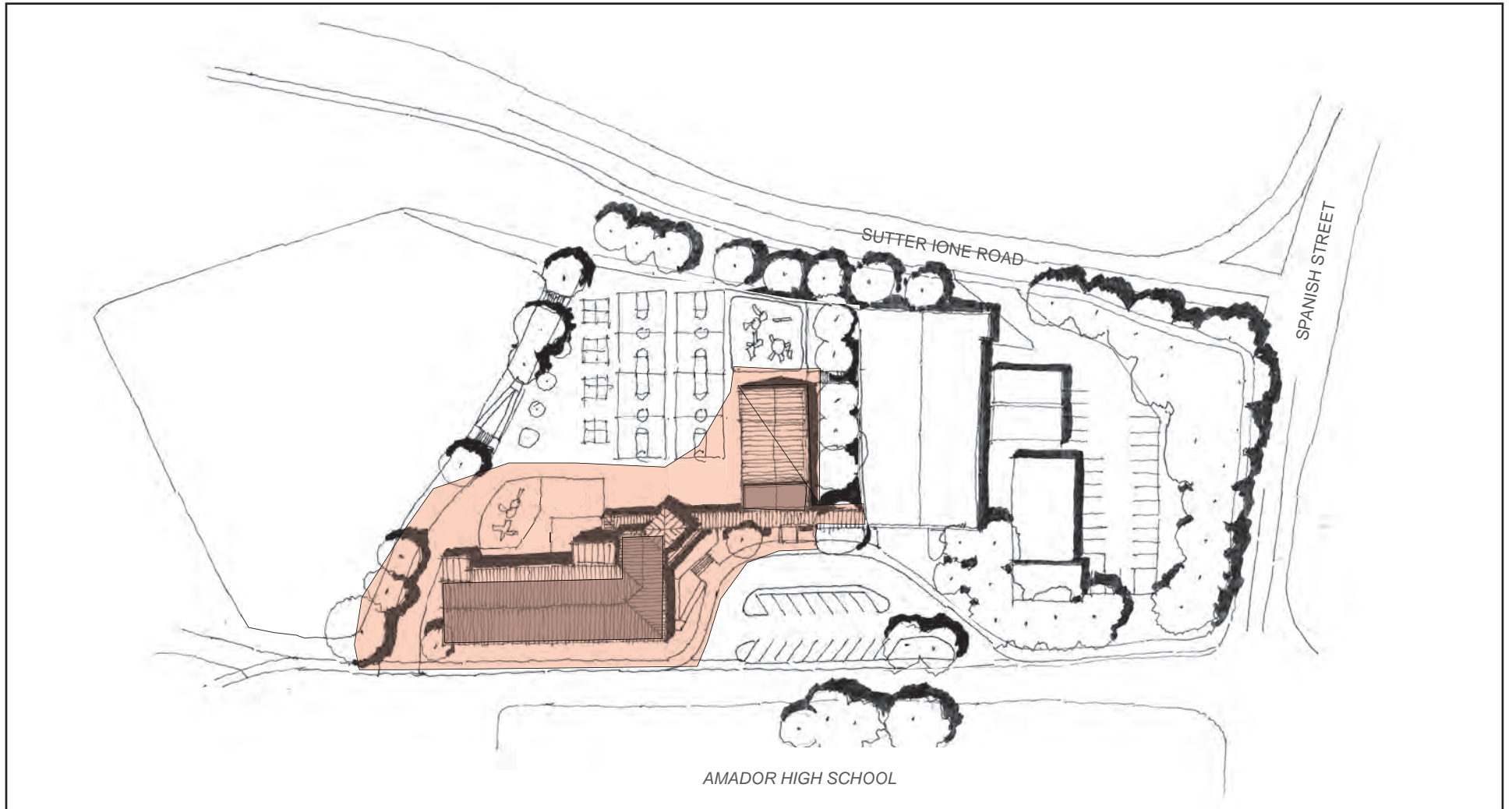


Scope of New Site Work

0 140
Scale (Feet)



Figure 5 - Sutter Creek Elementary School Site Improvements



Scope of New Site Work

0 110
Scale (Feet)



Source: California Design West Architects 2022.



CITY OF IONE
1 E. MAIN STREET
P.O. BOX 398
IONE, CA 95640
(209) 274-2412



July 19, 2023

ACUSD Office
Attn: Jared Critchfield
217 Rex Avenue
Jackson, CA 95642
CEQAcomments@acusd.org

Re: Response to Notice of Preparation- School Closure/Consolidation Program Project

Dear Mr. Critchfield:

This is in response to the **Notice of Preparation for the School Closure/Consolidation Program Project** (“Project”) issued by the District as Lead Agency under the California Environmental Quality Act (“CEQA”). As you are aware, the City of Ione and the greater community of Ione will be significantly affected by this Project.

First, we DID NOT receive the NOTICE of PREPARATION directly but would like to receive any and all notices in the future.

Secondly, it is our understanding that the Project used population numbers from 2013 when making their 2022 decision. We believe that the EIR should consider updated population numbers that more adequately address the actual population figures. Since 2020, Ione has experienced a 9% change in growth. Additionally, we have received public comment that a number of parents will choose the homeschool option over sending their students to Sutter Creek for junior high.

Economic impacts to the City and existing businesses should also be considered. Junior high students and their parents have a significant impact on our restaurants and grocery store. Moving the junior high will adversely impact our commercial activity negatively.

The City of Ione is insistent on ensuring that the public safety needs are met and that the consolidation plan as presented mitigates all traffic, public safety and sewer service issues. To that end, we hope ACUSD shares our concerns to ensure that potential risk factors are mitigated and the Project results limited negative impacts to our community. As a result, we would refer you to our General Plan which lays out our vision for our community as well as our Circulation plan.

To assist in your review, and as a responsible agency for purposes of CEQA, the City of Ione has identified potential impacts regarding traffic, public safety, and sewer which should be considered in the EIR.

Traffic Impacts:

- Traffic impacts will include increased congestion during drop off and pick up, which increase air pollution from idling and reroute other traffic to longer, alternative routes, increasing vehicles miles traveled (VMT). As a result, An access and circulation plan will be required to show how staff, parents, and students access the Ione Junior High School campus. This is a critical issue as there are existing deficiencies in the current access, resulting in long queues, vehicle stacking, and impacts to residents and public safety access.
- Existing and Proposed Drop-off and Pick-up plan areas must be identified to demonstrate how the additional students will be accommodated without impacting public safety and circulation on public streets. These plans should include both internal circulation and accommodation of additional traffic on public streets to prevent or minimize blockage of public streets.
- A Traffic Control Plan for pick-up and drop-off must be presented to address peak hour use.
 - The bell schedule for classes should accompany the traffic control plan submittals. This includes all schedules for ingress/egress from the campus by students and parents.
 - The streets in the area are narrow and were designed 70 plus years ago, thus not designed for bus traffic, and the proposed turn around will not comply with the fire code on Sacramento Street.

Public Safety Impacts:

- An internal circulation plan that contemplates emergency circumstances.
- The school's current enrollment is 339, and the proposed enrollment at the elementary site will increase to 649. A traffic study needs to be conducted to see what the impact of the added enrollment will impact public safety. The school is in a dense residential area on older streets in Ione. During the 2022-2023 school year, the school experienced ongoing traffic issues and attempted to mitigate the problems by routing the school buses differently. This was a disaster. South California Street was never designed to accommodate school buses.
- The existing roadways are currently impacted during peak hour school access times and cannot safely accommodate additional traffic without impacting public safety response.

There is also the impact to nearby residents and the traveling public, as the streets that front the Junior High School were not designed for the additional peak hour traffic that this project would create. Traffic control plans outlined above are required in order to analyze the impacts of the school expansion on the public streets to ensure that public safety access can be met for both the site and surrounding area served by the public streets.

- Please provide mitigation for impacts to pedestrian routes for students in the interplay with safe streets.
 - The consolidation plan does not take into consideration safety near the adjacent railroad line and the industrial facility next door to a primary school. The uses are incompatible.
 - Additionally, the Public Utilities Commission should be consulted regarding the consolidation plan.
 - The proposed parking is not owned by the school district, it is part of the Union Pacific rail road and there *are* plans to reopen the rail yard which will cause train cars in the area as well as truck traffic.
 - Security Fencing will need to be completely redone to assure primary school safety, and a completely closed campus.
 - Additionally, there is an open water pond at the west end of the campus, on private property accessible to the students.
- Busses: how many more buses there will be? Busses affect the surface streets around the school and the state highway coming into the City.
 - The added traffic will also create a burden on the City of Ione for maintenance of the city streets used for travel to the school.
 - Public safety personnel **must** be able to access the school efficiently and timely.
 - With only two ways in and out of the school, the added traffic will cause issues during drop-off and pickup, making it difficult for emergency personnel to access the school.

Emergency Response Time and Access

- Please provide an Emergency Access Plan. The surface streets leading into the school are not designed for the increased traffic flow caused by the elementary school-aged parent drop off or pick up, the arteries in that area are already over

load with the residential impact of the community, which are used as emergency evacuation zones for the south west side of town. The added impact will cause a log jam in the traffic flow and reduced response time during an emergency evacuation and the narrow streets leading into this campus, in the event of an emergency or a mass casualty incident, will not be passable in the event of parents rushing to the incident.

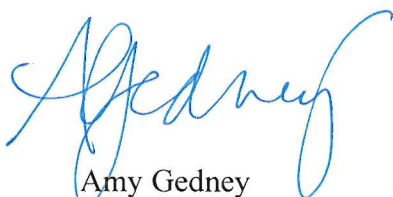
- Wild Land Interface- The south and west areas of the school have a direct threat from the Wild land Urban Interface (WUI)
 - Fire Evacuations routes for the small children in this campus is not safe and will case a logistical and control issue, this campus is not designed for primary students.
 - The upcountry schools are in a High to extreme fire hazard threat zone and evacuations concerns have not been addressed on those locations, the Ione Schools are in a moderate zone and need to be given a much higher rating to remain open, due to the reduced hazard threat in comparison.

Sewer Impacts:

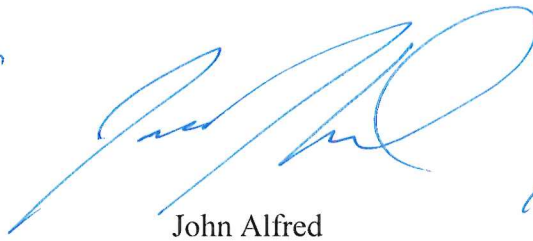
- The capacity of existing sewer facilities may not be adequate for the proposed use. An updated sewer study should be provided which shows the impacts of the additional flows on the existing system.

Again, please keep us informed. We welcome the idea for mutual discussion. The City of Ione wants to ensure that all impacts are adequately studied and reasonable and effective mitigation measures are implemented to reduce any impacts from the Project to less than significant.


Sincerely,



Amy Gedney
Interim City Manager



John Alfred
Police Chief



Ken Mackey
Fire Chief



"Preserving Our Past, Enriching Our Present, Building Our Future"

33 Broadway, Jackson, CA 95642-2301
(209) 223-1646 / Fax (209) 223-3141
e-mail: cinfo@ci.jackson.ca.us

July 20, 2023

Amador County Unified School District Sent via email: CEQAcomments@acusd.org
Attn: Jared Critchfield
217 Rex Avenue
Jackson, CA 95642

Re: Response to Notice of Preparation – School Closure/Consolidation Program Project

Dear Mr. Critchfield,

Thank you for the opportunity to respond to the Notice of Preparation for the School Closure/Consolidation Program Project ("Project"). The district's proposed improvements to facilities in the City of Jackson have the potential to generate significant impacts that should be fully vetted in the Environmental Impact Report (EIR). City staff has reviewed the project description and has identified the following impacts and potential mitigation measures which must be addressed in the EIR:

Traffic:

Traffic and circulation will be impacted significantly due to doubling the student population and the additional staffing levels at the Argonaut High School campus and a Traffic Impact Study is strongly recommended to review these potential impacts and proposed mitigation. It is anticipated that the most negative impacts will be at the intersections of Hoffman Street at Highway 49/88 and Argonaut Lane at Highway 49/88. Mitigation, including the installation of traffic controls and the completion of Sutter Street and Wicklow Way extensions should be considered. Stoney Creek Road, which is currently a narrow east/west two-lane roadway with unimproved shoulders, will see a significant amount of traffic during various sporting and school events that utilize the football field and track. Attendees of these events often park along Stoney Creek Road creating a one-way traffic situation beginning at the intersection with Argonaut Lane and moving west to the entrance of the football field. Additionally, Stoney Creek Road will eventually see an increase in traffic once the Wicklow Way bypass is completed. Mitigation measures addressing the impacts to Stoney Creek Road, including turn lanes, curb, gutter and sidewalks and "No Parking" signs should be analyzed in a Traffic Impact Study and subsequent EIR. City also anticipates that the Sutter St. Extension project will be expedited to mitigate potential impact. Should you be interested in the Sutter St. Extension project, please contact me at cinfo@ci.jackson.ca.us; or City's planning consultant Susan Peters at smpaicp@gmail.com.

It is also anticipated that there will be increased traffic due to the addition of a 6th grade class to Jackson Elementary School. Primarily, this traffic will affect the intersections of North Main Street at North Street, Water Street, and Summit Street as well as the parking lot on Summit Street. Secondly, it will further congest the intersection of Main Street and North Main Street and the



"Preserving Our Past, Enriching Our Present, Building Our Future"

33 Broadway, Jackson, CA 95642-2301

(209) 223-1646 / Fax (209) 223-3141

e-mail: cinfo@ci.jackson.ca.us

intersection of Main Street and Highway 49/88. Additionally, it is anticipated to prolong the one-way traffic modification on Church Street during morning drop off and afternoon pickup. Circulation impacts and potential mitigation for the proposed increased student population at Jackson Elementary School must be addressed in the EIR.

Police Protection:

The Jackson Police Department anticipates a significant increase in incidents at Argonaut High School with the doubling of the student body. From 2018 through 2022, The Jackson Police Department averaged 291 incidents at Argonaut High School per year. During the same time frame, the Sutter Creek Police Department averaged 298 incidents per year at Amador High School. Combining the two schools and effectively doubling the student population, the Jackson Police Department conservatively estimates an average of 589 incidents a year at the combined high school; effectively doubling our high school related yearly incidents. It is recommended that the EIR review mitigation that includes the Amador County Office of Education and the City of Jackson re-opening of the school resource officer program. This program should include a minimum of one school resource officer with access to on-site facilities. It should be noted the incidents compiled for this example account for both calls for service and officer-initiated incidents. The source of this information was obtained through the records in the RIMS law enforcement database and the statistics provided in the "notice of preparation" provided by the Amador County Office of Education.

Fire Protection:

The City of Jackson provides fire protection services for both the Argonaut High School and the Jackson Elementary School campuses. In order to ensure fire safety at both campuses, the EIR should review site infrastructure for adequate fire facilities (hydrants) and access, particularly to the center of Argonaut High School where new classrooms are proposed.

Additionally, the EIR should address the evacuation outflow of traffic from Argonaut High School on the local streets and the possibility that it will hinder access for incoming emergency vehicles to the campus. Currently, the traffic from the High School backs up at the intersection of Argonaut Lane and Highway 49/88 for a few hundred feet when school lets out. This back up extends to the intersection of Argonaut Lane and Mariposa Street and impacts emergency vehicle response from Station 132 on Argonaut Drive. There are no shoulders on Argonaut Lane to pull over and there is no clear line of sight for oncoming traffic. This currently slows the response time to emergency events – adding additional vehicles will worsen the situation.

Wastewater Services:

The City of Jackson provides wastewater collection and treatment to Argonaut High School. The City wastewater system has the potential to be significantly impacted by the proposed increased student population. The EIR must address these impacts.



"Preserving Our Past, Enriching Our Present, Building Our Future"

33 Broadway, Jackson, CA 95642-2301
(209) 223-1646 / Fax (209) 223-3141
e-mail: cinfo@ci.jackson.ca.us

In 2022 Argonaut High School's average monthly water use during the winter months was 379 hundred cubic feet (CCF)/Month (283,492 Gallons) or 9,450 gallons per day (GPD). This number is derived from actual water meter reads between December 2021 and March 2022. It is assumed 90% of this usage occurs during 8 am and 3 pm (7 hours) Monday through Friday:

$$90\% = 255,142$$

$$\text{Average of 22 weekdays} = 11,597.4/\text{day}$$

$$7 \text{ hours a day} = 1,657 \text{ gallons/hour}$$

The High School (HS) Lift Station, located on the Argonaut High School campus, also receives influent wastewater from the Westview subdivision. Westview's use during winter months (December 2021 – March 2022) was 719.75 CCF/Month (538,373 gallons) or 17,946 GPD. During the morning hours, calculations show approximately 1200 GPH. Westview's usage combined with the school's usage during peak hours reach flows of 2,857 gallons/hour.

The HS Lift Station is equipped with two submersible pumps which are rated for 200 GPM each. With a total wet well capacity of 2954.6 gallons this would mean that if the pumps failed during peak hour the lift station would overflow in a little over one hour. The pumps are programmed to turn on at 33% capacity or 985 gallons, which with peak flows the pumps would run 3 cycles an hour for 2 minutes and 30 seconds.

The High School Consolidation Project would add an additional proposed capacity of 789 students over current enrollment of 536 students. This would add 247.20% of current peak flows from the high school to the HS Lift station. Projected peak flows are as follows:

$$\text{Highschool: } 1657 \text{ GPH} \times 247\% = 4096 \text{ GPH}$$

$$\text{Westview: } 1200 \text{ GPH}$$

$$\text{Combined: } 5296 \text{ GPH}$$

With these proposed flows, if the pumps failed during a peak hour, the wet well would overflow in approximately 33 minutes; not giving operators enough time to react and mitigate the problem before an overflow occurs. The proposed project would also increase pump cycles to 5.4 cycles an hour for 2 minutes and 30 seconds. This almost doubles the lift station's current workload during peak hours and will likely require the lift station to be upsized.

The additional increased flow from the upsized lift station could potentially create an overwhelming surge to the current headworks at the City of Jackson's Wastewater Treatment Plant. The influent channel, spiral lift, compactor, and other components at the Wastewater Treatment Plant should be studied to determine each is sized correctly for the future increase.

In addition to the data above, the high school's collection system has infiltration issues that sends unnecessary flows to the lift station and wastewater treatment plant. This issue was extremely prevalent in the 2022/2023 winter storms as noted by collection system operators. Flows during winter storms



"Preserving Our Past, Enriching Our Present, Building Our Future"

33 Broadway, Jackson, CA 95642-2301
(209) 223-1646 / Fax (209) 223-3141
e-mail: cinfo@ci.jackson.ca.us

exceeded 40 percent above typical flows from Argonaut High School's collection system which required operator's around the clock attention.

Based on this information, the City of Jackson would request that the EIR analyze the following mitigation to address impacts to the wastewater services:

1. The inflow and infiltration (I/I) issues noted above are investigated and repaired;
2. The lift station is upgraded/resized to accommodate the proposed capacity increase plus an additional 25% to account for future growth of the high school;
3. A phone line is installed from the office hub to the lift station to provide a more reliable communication system for alarms and data logging;
4. A backflow device is installed to the snack shack's sewer lateral to ensure backups do not occur inside the snack shack from a failure of the lift station;
5. A new force main along with a secondary force main will be required to accommodate the additional capacity;
6. Access to the lift station should be paved as the dirt road is an issue in the winter when it comes to getting emergency equipment to and from the lift station; and
7. Install grease traps to any existing or future sewer line serving a kitchen.

Water

Currently Argonaut HS has (2) 2" rotating disk meters for domestic uses that accommodate a maximum flow of 160 GPM each. Peak usage typically occurs in the summer when school is out. In the last five years the high school used 2048 CCF or 1,531,904 gallons. Winter month uses tend to trend around 379 CCF/month. This is a better representation of base data to use to project the effect of the high school consolidation project. So in using 379 CCF multiplied by the proposed increase of capacity of 247% water use would project to be 936.13 CCF or 700,225 gallons. The City does not foresee the need for additional domestic services in relation to this project, the existing capacity is adequate.

The school also owns and operates its own private fire protection system. It is unknown to the City at this point whether additional fire protection would be needed for the consolidation project. However, if it is needed it would be recommended for the high school to loop the private fire system back into the City's water main. Doing this will provide better flows to existing and added hydrants. If additional fire protection is required by the county fire marshal or state, an additional backflow device would be required at or near the city main where the private fire system would be looped in.

Storm Drains

Due to the I/I issues in the high school's private sewer collection system, all existing storm drains will need to be investigated (Closed Circuit TV'd or dyed) and mapped from their origin to their destination. Also, the addition of buildings and paved access roads and parking areas may impact the drainage on the site. A detailed drainage study should be completed to address the pre and post project development flows.




"Preserving Our Past, Enriching Our Present, Building Our Future"

33 Broadway, Jackson, CA 95642-2301
(209) 223-1646 / Fax (209) 223-3141
e-mail: cinfo@ci.jackson.ca.us

Lastly, City adopted a development impact fee in 2019. This consolidation program will bring additional impact on the city's existing infrastructure. We expect the School District to comply with City's development impact fee regulations. A copy of the DIF can be found on city website or by emailing cinfo@ci.jackson.ca.us

We sincerely hope that the consultants preparing the EIR take the City's concerns about potential impacts and suggestions for mitigation seriously. Proper studies, including but not limited to traffic, sewer, drainage and essential service, are strongly recommended. City staff looks forward to working with the consultants and District staff to ensure that the CEQA process provides all necessary information to the Amador Unified School District Board to make an informed decision regarding the proposed Closure/Consolidation Project.

Sincerely,


Steve McLean, Mayor
City of Jackson

Mariana Zimmermann

From: MimiDene Zanze <mimidene@williams-assoc.com>
Sent: Wednesday, July 5, 2023 3:13 PM
To: Mariana Zimmermann; Dwayne Mears
Subject: FW: Consolidation

Follow Up Flag: Follow up
Flag Status: Flagged

Recent comment that we received.

MimiDene Zanze
Williams & Associates / P.O. Box 2125 / Placerville, CA 95667 / M (530) 906-6690

-----Original Message-----

From: 'Deborah Pretto' via CEQAcomments <CEQAcomments@acusd.org>
Sent: Wednesday, June 28, 2023 8:59 AM
To: CEQAcomments@acusd.org
Subject: Consolidation

Mr. Critchfield,

I see no plan for the greatly increasing traffic I expect on Argonaut Lane. I live two houses away from this street and am familiar with its faults. There are two narrow lanes and no sidewalk on the county part and no light at the busy intersection with 49/88. This is all compounded by the constant traffic of dump trucks from the EPA cleanup site. I hope someone is thinking through this part of the project.

Thank you.

Deborah Pretto

Sent from my iPad

--

You received this message because you are subscribed to the Google Groups "CEQAcomments" group.
To unsubscribe from this group and stop receiving emails from it, send an email to
CEQAcomments+unsubscribe@acusd.org.

Mariana Zimmermann

From: MimiDene Zanze <mimidene@williams-assoc.com>
Sent: Monday, July 24, 2023 11:02 AM
To: Dwayne Mears; Mariana Zimmermann
Cc: Jared Critchfield
Subject: FW: NOP - School Closure/Consolidated Program Project Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Hello—I am forwarding comments received.

MimiDene Zanze

Williams & Associates / P.O. Box 2125 / Placerville, CA 95667 / M (530) 906-6690

From: ceqacomment@acusd.org <ceqacomment@acusd.org> **On Behalf Of** Michael Huss
Sent: Wednesday, July 19, 2023 11:46 PM
To: CEQAcomments@acusd.org
Cc: Karen Huss <1hussfamily@sbcglobal.net>
Subject: NOP - School Closure/Consolidated Program Project Comments

Dear Mr. Critchfield,

Thank you for the opportunity to provide comments on the Notice of Preparation for the School Closure/Consolidation Program Project. As a resident of the City of Lone, my comments focus on CEQA topics that will be impacted by components of the project that occur in Lone.

Transportation/traffic related impacts need to be fully studied and mitigated, especially reducing vehicle miles traveled (VMT) (# of increased local trips and trip lengths) to a level that will not create gridlock along Preston Avenue and Main Street, and also put additional stress on Market, South Sacramento, South Mill, and Marlette streets, Relihan Drive and Church Street.

Full bicycle and pedestrian infrastructure improvements are needed to promote trips to/from the proposed Lone Elementary school site by bicycles and by walking, even skateboards and scooters. This would include filling sidewalk gaps and providing safe, visible pedestrian crossings and bicycle lanes, and safety signage and lighting. Improvements at road crossing are especially important along the State highways that are controlled by Caltrans.

Many of our subdivisions have barriers to non-motorized travel. The Wildflower subdivision doesn't have ADA compliant pathways to the school sites (current and proposed). Castle Oaks and Edgebrook subdivisions could have more direct access for pedestrians and bicycles to travel to school by providing additional crossings over Sutter Creek. There are two potential bicycle/pedestrian scale creek crossings to consider: at the end of Edgebrook Drive to West Marlette Street and St. Andrews Lane to West Marlette Street. These crossings would need to be improved to ADA standards and access created on both sides of the creek. These crossing would encourage more non-motorized travel in Lone, further reducing VMT.

The school site should provide sufficient number of bicycle racks and storage spaces for students and staff arriving by bikes, skateboard and scooters and needing a secure place to store their equipment.

The proposed school site for Lone Elementary (currently the Lone Junior High) is the transportation hub for all students in the Lone and Camanche areas that need bussed to the high schools in other towns. The traffic increase at the school site is going to be overwhelming to the neighborhood, including buses. All buses coming to this school site should be required to be low or zero emission buses to reduce diesel particulate matter exposure and other combustion related air pollutants to the residents surround the school site and the students at the school site.

If project construction occurs at Lone Junior High School during school hours, construction activity emissions need to be analyzed and mitigated to reduce exposure to our children.

Another issue that needs fully studied is the land use compatibility of converting Lone Junior High School to an elementary school. Students are sensitive receptors to air pollutants and our young breathers process more air than adults, increasing their exposure to pollution. A rock/dirt/cement yard is located along the southern border of the school site where dust and diesel emissions are common. There is a rail spur along the norther border of the school site that could become active and create additional diesel emissions right next to the school. Additionally, the school district currently houses the warehouse on the proposed Lone Elementary campus. Supply deliveries often arrive in diesel fueled vehicles, leading to more pollution for our children to breathe. The school district should relocate its warehouse operations to a more central location in the county, away from our young breathers. All school HVAC systems should be upgraded to accept the highest MERV rated filters the systems will accept. Portable filtration devices could be an option if an HVAC system cannot accept MERV 13 or higher filters. MERV 13 or higher is the standard that can filter out fine particulates.

I'm requesting notification when the draft environmental document is available for review.

Consideration of these comments are appreciated.

Sincerely,

Karen Huss
640 Oakshire Drive
lone, CA 95640
209-274-6461
1hussfamily@sbcglobal.net

--

You received this message because you are subscribed to the Google Groups "CEQAcomments" group.

To unsubscribe from this group and stop receiving emails from it, send an email to

CEQAcomments+unsubscribe@acusd.org.

Appendices

This page intentionally left blank.