

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

January 26 2024

January 23, 2024

STATE CLEARINGHOUSE

Jared Critchfield, Deputy Superintendent
Amador County Unified School District
217 Rex Avenue
Jackson, CA 95642

**Environmental Impact Report (EIR)
Amador County Unified School
District (ACUSD)
SCH 2023060568**

Dear Mr. Critchfield,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and respond to the Amador County Unified School District (ACUSD) Environmental Impact Report (EIR) 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. The ACUSD would add a 2-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.

ACUSD proposes 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).

ACUSD proposes 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. ACUSD would add 2 new classroom buildings and playground for preschool, TK, and Extending Learning; convert science labs to kindergarten classrooms; and convert restrooms to kindergarten restrooms. ACUSD would also expand the parent drop-off/pick-up areas, expand the kindergarten drop-off area, expand the kitchen, and construct a new play structure and hardcourt areas.

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

ACUSD would expand 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, ACUSD would construct a new classroom building with 12 classrooms and a lunch shelter.

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 Impact Report

General Comments

If the consolidation results in a physical encroachment 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 include an analysis of potential impacts on 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). In addition, CEQA compliance must include climate change analysis and evaluation regarding the change in commutes/traffic that may result from the school consolidation.

Section 5.9 Hydrology and Water Quality: Please provide pre- and post-construction runoff calculations and drainage plans to understand flow patterns. Additional review will be done once drainage plans and calculations are submitted for improvements at Argonaut High School, Lone Jr. High School, and Sutter Creek Elementary School.

Appendix J - CEQA Transportation Memorandum

Page 27: Mitigation Measure TRAF-1 includes hiring a travel demand management coordinator to administer the Transportation Demand Management (TDM) program and encouraging the additional use of school buses. The Memo needs to explain how to increase the use of school buses. Since the schools are consolidated into single locations, the school bus service needs to extend to all the cities (Lone, Sutter Creek, Jackson, etc.). The mitigation should include improving the school bus services.

Appendix K - Transportation Operations Memorandum

Please provide the following scenarios in the Traffic Operations memorandum:

- Existing Year
- Proposed Project Only (Trip Generation and Assignment)
- Existing Year Plus Proposed Project
- Cumulative Conditions without the proposed project
- Cumulative Conditions Plus Proposed Project

- Please provide analysis results for the 95th Percentile Queues. The 95th Percentile Queues and delays should be reported for each movement.

- The peak-hour traffic counts need to include bicycle and pedestrian volumes.

- The signal warrant analysis shows that the Sutter Street/Hoffman Street intersection meets the signal warrant. The Conclusions section states it does not. Please revise the conclusions based on the signal warrant analysis. Please also provide the raw traffic data (which appears to be a 24-hour count) in the attachment for this Traffic study.

Appendix K - Transportation Operations Memorandum (continued)

- The proposed project will increase a significant amount of traffic at the two intersections: SR 88/Argonaut Lane, and Sutter Street (SR 88)/Hoffman Street. The safety concerns associated with the increased traffic from the proposed project, especially for the vehicles making a left turn out from the local roads experiencing a higher risk of broadside collisions with the mainline traffic due to longer wait at the stop sign, need to be addressed with the proposed project.
- The traffic impact from the combined Junior High School at the current Amador High School should also be analyzed. Even though the total number of students remains the same, due to changes in traffic patterns from the combined school, the traffic would come from adjacent cities like Lone and Jackson instead of locally from Sutter Hill only.
- Please use the CA MUTCD worksheet for the traffic signal warrant study instead of Vistro. Please use Synchro / SimTraffic software for the intersection analysis and provide the electronic files (Synchro Version 12) for Caltrans review.

Caltrans recommend scheduling a focus meeting to discuss the comments related to the Transportation Operations Memorandum.

Appendix L – Vehicle Miles Traveled Memo for Alternatives

- Page 2 and 3: Table 1, 2 and 3 - Additional information is needed to show how these values are calculated for columns "Existing VMT and Existing VMT + project".

Encroachment Permits

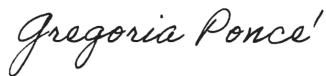
If any future project activities encroach into Caltrans ROW, the project proponent must submit an application for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. Appropriate environmental studies must be submitted with this application. These studies will include an analysis 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>

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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.

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: Mark Samuelson, Interim Planning Deputy, Caltrans D10
Duper Tong, Traffic Operations Deputy, Caltrans D10
State Clearinghouse
Chuck Beatty, Director, Amador County Planning Department