

## **RESOLUTION 2026-36**

### **A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF IONE OPPOSING THE PROPOSED CLOSURE OF IONE ELEMENTARY SCHOOL AND THE AMADOR COUNTY UNIFIED SCHOOL DISTRICT'S CONSOLIDATION PROGRAM**

**WHEREAS**, the Amador County Unified School District ("ACUSD") is considering a consolidation program that would combine six schools onto five campuses, including closing Ione Elementary School and converting Ione Junior High School into an elementary school; and

**WHEREAS**, the City of Ione ("City") recognizes the challenges ACUSD faces in serving the students of Amador County, and understands that Ione, like every community in the County, must help address those challenges; and

**WHEREAS**, the City, ACUSD, and the other cities in Amador County share a commitment to the students and families they serve, and the City believes the best outcomes will result from collaborative planning for school facilities, transportation, public safety, and future growth throughout the County; and

**WHEREAS**, the City acknowledges that the consolidation program would affect communities throughout Amador County, requiring students to travel farther to school and increasing traffic and travel burdens for families countywide; and

**WHEREAS**, the City Council understands that other cities within Amador County share similar concerns regarding the consolidation plan as currently proposed, while recognizing that the potential impacts may differ among communities; and

**WHEREAS**, the proposed consolidation would place a disproportionate burden on Ione, which would be the only community in the County to lose a school campus; and

**WHEREAS**, the consolidation would move students from Ione Elementary School, which has direct access to the state highway system, to the historic Ione Junior High School campus, which is served by older, narrow residential streets not designed to safely accommodate the increased traffic; and

**WHEREAS**, the Ione Fire Department has raised serious concerns regarding emergency access and evacuation at the Ione Junior High School campus, including its proximity to wildland fire risk and the effect of additional school traffic on residential streets that serve as evacuation routes; and

**WHEREAS**, Ione continues to grow and its continued development has contributed substantial school impact fees to ACUSD, yet the proposed closure would limit the City's capacity to serve future student growth; and

**WHEREAS**, schools are central to Ione's identity and local economy, and Ione would be harmed by the loss of its junior high grades and an elementary school campus; and

**WHEREAS**, the City Council recognizes that all Amador County communities must share in difficult decisions, but opposes a plan that asks Ione to bear a disproportionate share of the burden without adequately addressing the City's safety, traffic, and growth concerns.

**NOW, THEREFORE, BE IT RESOLVED**, by the City Council of the City of Ione as follows:

#### **SECTION 1. RECITALS**

The City Council finds that the above recitals are true and correct and incorporates them into this Resolution.

#### **SECTION 2. OPPOSITION**

The City Council of the City of Ione hereby formally opposes the closure of Ione Elementary School and the ACUSD's consolidation program as currently proposed.

#### **SECTION 3. REQUEST TO DELAY APPROVAL**

The City Council requests that the ACUSD Board of Trustees not approve the consolidation program until the traffic, public safety, emergency access, and growth concerns identified in this Resolution have been fully evaluated and addressed in consultation with the City.

#### **SECTION 4. CONSIDERATION OF GROWTH**

The City Council requests that ACUSD fully consider the ongoing and future projected growth in the City of Ione before making a final decision affecting schools in Ione.

#### **SECTION 5. CONTINUED COLLABORATION**

The City remains committed to working collaboratively with ACUSD and the other cities in Amador County. The City requests that ACUSD engage with those cities to evaluate alternatives that address ACUSD's financial and enrollment challenges while preserving schools in Ione, ensuring student safety, and planning for future growth throughout the County.

#### **SECTION 6. AUTHORIZATION**

The City Manager and City Attorney are authorized to take any actions necessary to carry out this Resolution, including submitting comments to the ACUSD and participating in any proceedings on the consolidation program.

#### **SECTION 7. TRANSMITTAL**

The City Clerk is directed to transmit a certified copy of this Resolution to:

- Amador County Unified School District Board of Trustees;
- ACUSD Superintendent;
- Other agencies or representatives the City Council determines appropriate.

The foregoing resolution was duly introduced and adopted by the City Council of the City of Ione at their special meeting held on October 5, 2026 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Approved:

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Jody Maita, Mayor

Attest:

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Janice Traverso, City Clerk

September 30, 2026

**VIA EMAIL & US MAIL**

Jared Critchfield, Superintendent  
Amador County Unified School District  
217 Rex Avenue  
Jackson, California 95642  
[jcritchfield@acusd.org](mailto:jcritchfield@acusd.org)

**Re: Comments of the City of Ione on the Initial Study/Mitigated Negative Declaration  
for the Amador County Unified School District Consolidation Program Project;  
Request that the District Prepare an Environmental Impact Report**

Dear Superintendent Critchfield:

This firm serves as City Attorney for the City of Ione ("City"). The City submits the following comments on the Initial Study and proposed Mitigated Negative Declaration ("IS/MND") for the Amador County Unified School District Consolidation Program Project ("Project"), circulated for public review from September 1 through September 30, 2026.

Approving this IS/MND for the Project is illegal and contrary to the standards required by CEQA. This Project clearly requires an Environmental Impact Report ("EIR") to allow for meaningful evaluation of all potentially significant impacts and to determine appropriate mitigation. Without that required process, the IS/MND amounts to a rushed and inadequate analysis of a Project that will substantially affect children and families throughout Amador County.

An EIR would allow the Amador County Unified School District ("District"), responsible agencies, and the public to understand how the Project should be modified, redesigned, or mitigated in response to its environmental impacts. Instead, an IS/MND is being rushed through for approval in advance of an election date, despite being clearly inadequate for a Project of this magnitude. This is a substantial Project that would close one school in Ione and shift hundreds of students to different campuses throughout the County. If a Project of this scope can proceed without an EIR, current and detailed traffic studies, and a full analysis of existing and projected enrollment information, then CEQA is reduced to a meaningless procedural exercise rather than the informed environmental review process the law requires.

The City sincerely hopes the District's Board of Trustees considers these comments before it takes any action on the Project, and at the very least direct that an EIR be prepared, which should have been clear at the outset given the nature of the Project. The City's central comment is this: the IS/MND is not an adequate informational document, and the record before the District contains substantial evidence supporting a fair argument that the Project may have significant effects on the environment. An EIR is therefore required. (Pub. Resources Code, § 21100; Cal Code Regs., tit. 14 "CEQA Guidelines", § 15064, subd. (f); *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.) Several of the defects identified below are not matters of professional disagreement. They are issues related to missing analyses, analyses prepared for a different project, and a failure to analyze projected enrollment information in future years.

## **I. The City of Lone's Interest and its Role Under CEQA**

Two of the six affected campuses are in Lone: Lone Junior High School, which would be converted to a preschool-grade 6 elementary school with new construction; and Lone Elementary School, which would be closed. Under the Project, Lone would be the only community in the District that loses a school campus outright, and Lone's seventh and eighth graders would, for the first time, be transported out of the City to the consolidated junior high school on the Argonaut campus in Jackson. By the IS/MND's own count, Lone campuses would lose a net 305 students (IS/MND at p. 195).

The City is not merely an interested member of the public. The IS/MND itself acknowledges that the new classroom building at Lone Junior High School lies within FEMA Flood Zone AE and that *"Section 18.04.130 of the Lone Municipal Code requires a floodplain development permit before construction begins in a 100-year floodplain"* and that the structure *"must be certified by a registered civil engineer or architect and approved by the Floodplain Administrator of the City of Lone"* (IS/MND at p. 133). Government Code section 53097 requires that the District comply with this ordinance as it regulates drainage improvements and conditions and requires review and approval of grading plans. The District cannot build what it proposes at Lone Junior High School without a City permit, and the City's comments are accordingly those of an agency that will be asked to act on this Project.

## **II. Legal Standard**

A negative declaration may be adopted only if there is no substantial evidence, in light of the whole record, that the project may have a significant effect on the environment. (CEQA Guidelines, § 15074, subd. (b).) If substantial evidence supports a fair argument that a significant effect may occur, the agency must prepare an EIR even though other evidence supports the opposite conclusion. (*No Oil, Inc. v. City of Los Angeles*, supra, 13 Cal.3d at p. 75.) This is a low-threshold test, and the agency's determination is reviewed independently rather than deferentially.

Four related principles bear directly on this IS/MND:

First, the Project description is incomplete and inadequate because it does not clearly describe the Project's full scope, phasing, campus changes, and reasonably foreseeable operational conditions. An accurate, stable, and finite project description is an indispensable prerequisite to an informative and legally sufficient environmental document. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193-199.)

Second, the transportation analysis does not adequately evaluate the specific Project now proposed, but instead relies on traffic data and operational conclusions prepared for a materially different prior project. The analysis must be updated to evaluate the current Project using appropriate project-specific assumptions, traffic counts, enrollment, circulation patterns, and phased conditions. (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450; *Pfeiffer v. City of Sunnyvale City Council* (2012) 200 Cal.App.4th 1552, 1573.)

Third, the proposed mitigation measures must be reviewed and revised to address the deficiencies identified in this letter and to ensure that any mitigation is specific, enforceable, and supported by appropriate performance standards. (CEQA Guidelines, § 15126.4, subd. (a)(1)(B); *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-309.)

Fourth, the District must further substantiate and explain the Project's underlying premise of declining enrollment, including through consideration of reasonably foreseeable residential growth in the City of Lone. Those assumptions bear directly on necessary facilities, future campus populations, and resulting environmental impacts, particularly transportation. (*El Dorado Union High School Dist. v. City of Placerville* (1983) 144 Cal.App.3d 123, 131; *Fullerton Joint Union High School Dist. v. State Bd. of Education* (1982) 32 Cal.3d 779; *Goleta Union School Dist. v. Regents of Univ. of California* (1995) 37 Cal.App.4th 1025, 1033.)

These issues, together with the additional informational, analytical, and mitigation deficiencies identified throughout this comment letter, require an EIR before the District can make the necessary findings and approve the Project.

### III. The Project Description is Incomplete and Unstable

#### A. The three-year phased conversion of the lone campuses is never described.

In the entire 230-page document, the fact that the lone conversion occurs in phases appears in the Public Services discussion: "*The current Lone Junior HS campus would be converted into the new Lone ES through a three-year phased transition process*" (IS/MND at p. 166). However, Chapter 2, *Project Description*, says nothing about it. The IS/MND therefore never discloses interim-year enrollment at either lone campus, interim grade configurations, interim attendance boundaries, interim bus routing, or interim circulation and drop-off

conditions, and no technical chapter analyzes any interim year. Impacts are evaluated only at an assumed end state. A three-year transition affecting two campuses and more than 950 children is a material project characteristic, not an insignificant detail of the Project. (*El Dorado Union High Sch. Dist. v. City of Placerville, supra*, 144 Cal.App.3d at p. 131.) The gap matters because construction at the lone campus would not begin until fall 2029 or finish until spring 2030. (IS/MND p. 38.) The IS/MND does not say when lone Elementary will actually close, or whether portables or other interim facilities will be needed.

This is a critical detail because the environmental impacts of the consolidation may vary materially during each phase of implementation. (See *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 455-461 [recognizing that meaningful environmental review requires consideration of both the short-term and long-term effects of a project].)

The project description should therefore not only describe the ultimate end-state conditions, but also the reasonably foreseeable interim conditions associated with phased school closures, student reassignment, transportation changes, facility use, and related operational changes.

#### IV. The Transportation Analysis Does Not Analyze This Project.

##### A. The queuing and operations analysis was prepared for a different — in fact, a reversed — project.

The IS/MND and Appendix D both state that “[v]ehicle queuing was analyzed as part of the operational analysis prepared and submitted to ACUSD in October 2024 with the old project description” and that changes in volumes are “relatively minor,” so that “the conclusions related to vehicle queuing in the prior study are comparable” (IS/MND at p. 188; Appendix D at D-39.) The October 29, 2024 Kittelson memorandum embedded in Appendix D was prepared for the District’s earlier, abandoned EIR-stage project, where it analyzed the opposite campus assignments: consolidating Amador and Argonaut High Schools at the Argonaut campus and the two junior high schools at the Amador campus, with capacity increasing from 925 to 1,325 students. This traffic study further involved consolidating and reconfiguring eight schools into six campuses (See Kittelson memorandum at D-42.) That prior project further involved consolidating the junior high school campuses at the Amador High School campus site, and not the Argonaut site in Jackson. (*Ibid.*) However, the current Project does no such thing. The current Project involves the consolidation of six campuses into five campuses, at different schools and locations that what was analyzed in the prior, proposed project (IS/MND at p. 2).

Accordingly, the queuing, storage, and signal-warrant conclusions were drawn for a materially different distribution of students among campuses and therefore do not constitute substantial evidence for the IS/MND. (*Chawanakee Unified Sch. Dist. v. County of Madera* (2011) 196 Cal.App.4th 1016, 1028.) The IS/MND’s own figures undercut its claim that

the differences are “relatively minor”: southbound left-turn project volumes at SR 88/SR 49 fall from 190 to 120 vehicles in the AM peak hour, a 37 percent change, and the document concedes that queues at that intersection would exceed the available storage under existing-plus-project conditions (IS/MND at p. 188).

As a result of this change, new counts and new modeling are therefore required to ensure an adequate understanding of the traffic conditions associated with the proposed Project and corresponding impacts. (IS/MND at 1029.) The environmental analysis should not require reviewing agencies or the public to determine, intersection by intersection, whether each prior traffic count, queuing analysis, or operational conclusion remains sufficiently similar to a materially different prior project. A current, project-specific traffic analysis would provide the clear and coherent evidentiary basis necessary to evaluate the proposed Project’s actual transportation effects.

**B. The same consultant’s VMT conclusion reversed without explanation.**

In the prior project, the consultant concluded that “VMT per person is estimated to increase by about 5.2%, resulting in a significant impact” and that the impact would “remain significant and unavoidable because the effectiveness of a TDM Plan in reducing the number of Project trips cannot be adequately quantified.” (Appendix D at D-125; D-130.) For the current Project, the IS/MND concludes that a 4.5 percent increase in VMT per person (11.0 to 11.5 miles) would be less than significant with mitigation, relying on the same category of transportation demand management plan that the consultant previously asserted could not be quantified. In fact, nothing in the IS/MND explains the change in position. A 4.5 percent increase and a 5.2 percent increase may not be materially different in kind, yet the IS/MND fails to explain the dramatically different significance determinations.

The District’s less than significant conclusion is contradicted by substantial evidence contained in its own supporting transportation appendix. The consultant’s prior conclusion of an increase in VMT per person, which constituted a significant impact, is expert opinion in the District’s own record. The transportation appendix is itself substantial evidence supporting a fair argument that the VMT impact remains significant. (*Upland Cmty. First v. City of Upland* (2024) 105 Cal.App.5th 1, 15 [stating “[i]f there [is] substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it [can] be ‘fairly argued’ that the project might have a significant environmental impact.”])

The IS/MND cannot resolve that conflicting evidence merely by reaching a different conclusion without explaining the analytical basis for doing so, or without demonstrating that the proposed mitigation will actually reduce the impact to a less than significant level. Since substantial evidence in the record supports a fair argument that the VMT impact likely

remains significant despite the proposed mitigation, the impact must be fully evaluated in an EIR.

**C. Mitigation Measure TRA-1 is deferred, voluntary, and unfunded.**

Mitigation Measure TRA-1 provides that “[w]ithin two years of project approval, ACUSD shall prepare and implement a Transportation Demand Management (TDM) Plan.” (IS/MND at p. 185.) The plan does not exist. Its components are described as voluntary or aspirational. The carpool program is expressly “voluntary, and no financial incentive is offered to parents”; undefined park-and-ride hubs are to be arranged with churches, libraries and community centers; the District will “look to implement” a tiered bell schedule; and if the VMT target is missed, the District “shall prepare and implement corrective action plans” of unspecified content. (*Id.* at pp. 185-187.) The measure does state a target (no increase in VMT per person), but a performance standard is no substitute for evidence that the measure can meet it. By the IS/MND’s own calculation, closing the VMT gap requires carpool participation by 626 households, about 8 percent of the affected student population, through a program that is voluntary and offers no incentive. (*Id.* at 185.) The IS/MND supplements the measure with the assertion that declining enrollment will reduce VMT over time, without any enrollment data. (*Ibid.*) A mitigation measure with no evidentiary basis for its effectiveness cannot support a finding of less than significant impact. (*Sundstrom v. County of Mendocino, supra*, 202 Cal.App.3d at pp. 306-309; CEQA Guidelines, § 15126.4, subd. (a)(1)(B); *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.) The air quality and greenhouse gas chapters rely on this same measure, so the defect carries into those findings as well. The mitigation measure must include clear and enforceable benchmarks, implementation deadlines, and monitoring requirements, so that the public and affected agencies can meaningfully track implementation and determine that the mitigation supports the IS/MND’s significance conclusion.

**D. The bus-capacity assumption is contradicted by the District’s own record.**

The VMT calculation credits a shift of students to school buses, resting on the District’s estimate that “the lone routes could potentially accommodate approximately 150 additional students.” (IS/MND at pp. 186-187.) Appendix D simultaneously reports that “ACUSD is facing an ongoing bus driver shortage that has led to the daily cancellation of multiple bus routes” and that there were “72 route cancellations” in the 2025–26 school year. (Appendix D at D-6.) Mitigation Measure TRA-1 tacitly concedes the point: it has the District “commit to no longer canceling school bus routes”, with no funding, hiring plan, or contingency showing how the driver shortage will be cured. (IS/MND at p. 186.) If the assumed bus shift does not occur, the vehicle trips and the emissions attributable to them fall on lone families and lone streets. The City requests a sensitivity analysis showing the Project’s VMT, emissions, and intersection operations if bus ridership does not increase. (*King & Gardiner Farms, LLC v. County of Kern, supra*, 45 Cal.App.5th 814.)

- E. The traffic analysis is severely inadequate and further fails to evaluate site-specific traffic hazards, emergency access, and evacuation impacts at the Lone Junior High School campus.

The SimTraffic queuing analysis in Appendix D covers intersections in the Jackson and Argonaut area. The Lone study intersections received level-of-service figures only, with no queue-storage modeling. This is despite the fact that the Project builds a new kindergarten pick-up and drop-off loop at the Lone Junior High School campus, restripes the northern lot from 20 to 68 spaces, and raises enrollment on that campus from 396 to approximately 658 students, now including preschool and kindergarten children whose parents drive them. In addition, the traffic counts used for the Lone intersections were carried forward from a 2023 study and adjusted through assumed background growth factors rather than based on current counts. The City therefore asks that current counts be taken and that queuing, storage, and site access be modeled for South Mills Street, the SR-124 corridor, and the adjacent local street network under both interim and build-out conditions. (*Chawanakee Unified Sch. Dist. v. County of Madera, supra*, 196 Cal.App.4th at p. 1029.)

This is not a request for level-of-service analysis, which CEQA no longer treats as a measure of environmental impact. Rather, the issue is whether the District has adequately supported its conclusion that the Project will not create hazardous traffic conditions, interfere with site access, or impair emergency access. (CEQA Guidelines, § 15064.3.) On those questions, the IS/MND offers little more than the expectation that “drivers are attentive when driving and obey traffic laws.” (IS/MND at p. 189.) That is an assumption, not a site-specific analysis, of how the substantially increased enrollment and new kindergarten loading activity will function within the existing roadway network. The streets surrounding the Lone Junior High campus are narrow residential streets, while Lone Elementary has substantially better access to the state highway system and comparatively limited effects on surrounding neighborhood streets. The Project therefore shifts a substantial student population and associated vehicle activity from a campus with better regional access to a campus where access is more dependent on constrained local streets.

Without modeling the location and extent of vehicle queues, available storage, ingress and egress movements, and the interaction of those movements with SR-124 and surrounding residential streets, the reader and affected agencies cannot adequately evaluate the Project’s traffic effects. (*Chawanakee Unified Sch. Dist. v. County of Madera, supra*, 196 Cal.App.4th at p. 1029.) In particular, the analysis does not establish whether parent vehicles may queue onto a state highway, obstruct local streets, create conflicts at campus entrances, or otherwise result in potentially significant safety or emergency-access impacts. Those concerns are heightened during an emergency, evacuation, or other critical event, when the substantial increase in enrollment at the Lone Junior High campus will affect the availability and functionality of local evacuation and emergency access routes.

These issues require detailed analysis in the applicable transportation and emergency conditions analyses. The Project must be evaluated under reasonably foreseeable emergency conditions, particularly given the substantial shift in student population and traffic from one campus to another with materially different roadway conditions. (IS/MND at pp. 189, 203-205; *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 136-143.) The IS/MND instead largely paints over these issues by focusing on discrete site improvements, while failing to analyze the broader emergency access and evacuation consequences of shifting the student population to the lone Junior High campus under much different circulation constraints. That omission is a fundamental analytical deficiency. Without evaluating the conditions most likely to create conflicts during an emergency or other high stress event, the District lacks a sufficient basis to conclude that the Project's transportation and emergency access impacts are less than significant.

**F. The loss of walk-to-school access in lone is not analyzed.**

Appendix D assumes that half of the students living within the walk radius of the lone campuses walk to school today. Under the proposed Project, the junior high grades are removed from lone entirely, meaning that students within that existing walking cohort would instead need to be transported by private vehicle or bus to another campus. That change is directly relevant to the Project's transportation analysis because it would convert existing non-vehicle school trips into additional vehicle or bus trips and could materially affect the assumptions used to estimate traffic volumes, queuing, circulation, and site access.

The IS/MND does not adequately evaluate those resulting transportation effects. Its conclusion that the Project would not conflict with programs supporting pedestrian and bicycle facilities is irrelevant to whether elimination of existing walk-to-school trips will increase vehicle trips or alter traffic conditions within lone. The analysis should account for the additional parent and bus trips generated by students who can no longer walk or bicycle to their assigned school, and further evaluate whether those trips contribute to queuing, roadway conflicts, traffic hazards, or interference with emergency access. Without incorporating that foreseeable mode shift into the Project's traffic assumptions and the Appendix D transportation study, the IS/MND lacks an adequate basis to conclude that transportation safety and emergency-access impacts would be less than significant.

**VI. Historical Resources: lone Junior High School Is a Locally Designated Landmark**

The IS/MND acknowledges that "[t]he City of lone Historical Landmarks identifies the lone Junior HS as a local historical resource" and that the building dates to 1939. (IS/MND at p. 78.) A resource included in a local register of historical resources is presumptively an historical resource for CEQA purposes. (Pub. Resources Code, § 5020.1, subd. (k); CEQA Guidelines, § 15064.5, subd. (a)(2).) The IS/MND nevertheless finds no impact on the ground that no classroom building will be demolished, without any evaluation by a qualified architectural historian, without DPR 523 forms, without applying the Secretary of the

Interior's Standards, and without considering whether a new 4,500-square-foot building, a reconfigured 68-space parking lot, a new drop-off loop, and removal of up to four valley oak trees would materially impair the setting and character-defining features of the former Lone High School.

The analysis requires more than a determination that the Project does not physically alter or demolish the historic classroom buildings themselves. The IS/MND should also evaluate whether the substantial increase in enrollment and intensified use of the campus could result in degradation of the historical resource or its setting through increased traffic, parking, circulation, pedestrian activity, maintenance demands, or other reasonably foreseeable operational effects. (*Goleta Union Sch. Dist. v. Regents of Univ. of California*, *supra*, 37 Cal.App.4th at pp. 1032-1033; *El Dorado Union High Sch. Dist. v. City of Placerville*, *supra*, 144 Cal.App.3d at p. 131.) Without such discussion, the IS/MND's significance determination and its conclusion that no mitigation measures are necessary is inadequate. Without further evaluation of the substantially intensified use of the site, the IS/MND does not provide an adequate basis to conclude that impacts to this identified historical resource will remain less than significant.

#### **VII. The "Declining Enrollment" Premise, Missing Information Regarding Projected Growth in the City of Lone, and the Absent Cumulative Analysis**

The Project's stated purpose is to address declining enrollment, yet the IS/MND does not provide or explain the enrollment projections on which that premise rests. It contains no enrollment projection, no demographic study, and no identifiable source supporting the declining enrollment. Nor does it evaluate that premise against anticipated residential growth in the City of Lone, notwithstanding substantial pending and planned residential development contemplated by the City's General Plan and projected buildout. (*El Dorado Union High Sch. Dist. v. City of Placerville*, *supra*, 144 Cal.App.3d at pp. 132-133) A proposal to close schools and permanently reconfigure attendance patterns throughout the District should disclose the enrollment projections upon which those decisions are based and evaluate whether those projections remain reliable in light of reasonably foreseeable growth. (*Ibid.*)

The absence of that information is particularly significant because the District itself has recently acknowledged that its enrollment and facility planning requires more current growth information. On September 8, 2026, and enclosed herein, the City received a District request for information regarding projected residential development, in which the District stated that "the board needs reliable information on the timing and likelihood of future residential growth so that enrollment and facility decisions are based on current, documented data rather than maximum theoretical buildout numbers or unsupported assumptions." That request confirms that information relevant to the Project's underlying enrollment assumptions remains under analysis. As more current growth and enrollment information is obtained, the Project's underlying projections, and necessarily portions of its environmental analysis may change. (*San Franciscans for Reasonable Growth v. City and*

*County of San Francisco* (1984) 151 Cal.App.3d 61, 80.) This is especially important for transportation impacts, because enrollment levels and the geographic distribution of students directly affect trip generation, school assignment patterns, parent vehicle trips, bus operations, queuing, circulation, and site-access conditions.

The cumulative impacts discussion, in the Mandatory Findings of Significance section, identifies no other project of any kind. It does not include a list of past, present and probable future projects, nor a summary of projections from an adopted planning document, the two methods CEQA Guidelines section 15130(b)(1) prescribes for evaluating the cumulative effects that sections 15064(h) and 15065 (a)(3) require an initial study to consider. It asserts that the Project “*will not combine with the other projects to create a cumulative impact*” without ever naming one. Residential growth in Lone, the District’s own multi-campus program, and City and County capital projects are the obvious starting points.

These deficiencies also demonstrate why adoption of a Mitigated Negative Declaration at this stage is inadequate. (*Upland Cmty. First v. City of Upland, supra*, 105 Cal.App.5th at p. 15.) The District is still seeking information bearing directly on the central premise of the Project and on environmental assumptions that depend upon future enrollment and residential growth. Proceeding through an EIR would provide the structured process necessary to evaluate that information as it becomes available, including issuance of a notice of preparation, agency scoping and consultation, preparation of an EIR, and formal responses to agency and public comments. The Project’s basic enrollment assumptions, and the resulting transportation and cumulative impact conclusions, depend on information the District itself is presently seeking.

CEQA therefore requires preparation of an EIR to ensure that the Project is evaluated using current information and meaningful agency input before final environmental conclusions are made.

#### **X. Requested Action**

For the reasons above, the City of Lone requests that the District:

- Decline to adopt the proposed Mitigated Negative Declaration and instead prepare an EIR for the Project;
- Revise the Project description and corresponding environmental analysis to provide the public and affected agencies with adequate information regarding the Project’s phasing and reasonably foreseeable operational conditions, including the effects of increased enrollment and traffic on emergency access and evacuation routes.
- Update the traffic analysis and the proposed Project’s actual baseline, campus assignments, enrollment assumptions, circulation patterns, and phased implementation conditions;
- Evaluate the City of Lone’s reasonably foreseeable residential growth and resulting enrollment, transportation, and infrastructure demands, and update the Project-specific and cumulative impact analyses accordingly; and

- Adopt enforceable mitigation measures, with appropriate performance standards, as may be identified through the EIR process.

Pursuant to Public Resources Code sections 21092.2 and 21167, subdivision (f), the City requests written notice of any public hearing on the Project, of the District's determination on the environmental document, and of the filing of any notice of determination. Please direct those notices to the City of Ione City Clerk.

The City and its residents have a long-standing interest in the schools that serve Ione. We thank the District for its consideration of these comments and respectfully request a full evaluation of environmental impacts before such a permanent change is made to the educational future of Amador County.

Kind regards,

White Brenner LLP



Josh G. Varinsky  
Ione City Attorney

JGV/prb

Cc: Amador County Unified School District Board of Trustees  
Mayor and City Council, City of Ione  
George Lee, City Manager  
Kevin Valente, Raney Planning & Management  
Forrest Ebbs, Raney Planning & Management

Enclosure - September 8, 2026 District Information Request to City of Ione